

Charlton Riverside, Woolwich Town Centre, Eltham Town Centre & Peninsula West Masterplan SPDs Statement of Consultation – April 2012

Introduction

- 1.1 This statement provides an overview of the consultation undertaken during the production of the Charlton Riverside, Woolwich Town Centre, Eltham Town Centre and Peninsula West Masterplans, which will be adopted by Royal Greenwich as Supplementary Planning Documents.
- 1.2 Consultation was carried out for a four week period, in line with the measures set out in the Borough's Statement of Community Involvement. It has played an important role in informing the content of the SPD.
- 1.3 195 formal responses were received in total to the consultation. These were received from a range of individuals, local amenity groups, organisations and businesses. This is in addition to the many informal comments made at the range of exhibitions held across the Borough.

Details of the Consultation

2 Summary

- 2.1 The formal consultation on the masterplan took place between Friday 10th February and Friday 9th March. The following took place as part of this consultation:
 - Approximately 2200 individuals, local groups, businesses, landowners and organisations were notified by either email or letter, including specific and general consultation bodies. 1900 letters and 300 emails were sent.
 - A summary leaflet and a poster were prepared to help advertise the consultation and to help inform people. These were sent out to all libraries in the Borough and over 50 community centres

- Both the Royal Greenwich website and the Objective consultation portal were updated to advise people of the consultation and the document was made available to view here. Additionally, it was possible to answer the questionnaire online
- Advertisement placed in Greenwich Time on Tuesday 7th February, indicating the start and end date of the consultation and when and where the documents could be inspected
- An article was published in Greenwich Time on Tuesday 21st February
- Exhibitions were prepared for this and three further masterplans, which were displayed in four locations across the Borough throughout the majority of the consultation period
- Staffed exhibitions were held across the Borough for this and three further masterplans, giving people the opportunity to speak to the team and ask questions. Presentations took place at these events, which were held on a range of days and times. For further details on these, see section 3 below
- A number of other meetings were held. For further details on these see section 4 below

3 Exhibitions

Eltham Town Centre: Thursday 16th February

- 3.1 This event took place from 3-8pm on Thursday 28th February within the foyer of the Eltham Centre. Two presentations were held on the Eltham Town Centre masterplan at 4pm and 6.30pm.
- 3.2 Approximately 20 people attended the afternoon presentation and 4 people attended the evening presentation. In addition, many more people dropped in to view the exhibition and ask questions throughout the afternoon/evening.
- 3.3 There was a range of interests in attendance, including local interest groups (Eltham Society, Eltham Park Residents Association), residents and businesses.
- 3.4 The overall view from attendants was fairly positive. Although there were a number of individual concerns and queries raised, there was no large scale concern over particular proposals. Individual concerns raised included the impact of extending pavements on the flow of traffic, height of new developments, the type of residential development that might be provided, timescales for when the school would move, the future of Royal Mail and the readiness of BT to move.

Charlton Riverside/Woolwich Town Centre: Monday 20th February

- 3.5 This event took place from 3-8pm on Monday 20th February at Charlton Athletic Football Club. Two presentations were held on both the Charlton Riverside and Woolwich Town Centre masterplans at 4pm and 6.30pm
- 3.6 There was a good attendance, with approximately 25 people attending the afternoon presentation and 15 attending the evening presentation. In addition, there were a number of people who dropped in to view the exhibition and ask questions throughout the afternoon/evening.
- 3.7 There were a range of interests in attendance, including local interest groups (Charlton Society, Central Charlton Residents Association, Charlton Riverside Action Group), residents and businesses. Cllr Fahy, Cllr Barwick and Cllr Mills were also in attendance.
- 3.8 A number of individual questions were raised throughout the course of the event. Regarding Charlton Riverside, there were some concerns raised over how the loss of businesses in the area would be managed and the potential threat of CPO. It was also asked if we could bring out more in the masterplan the improvement of the Woolwich Road frontage and the importance of a continuous riverside path was noted by a number of attendees.
- 3.9 There were generally many more queries and concerns raised on the Charlton Riverside masterplan at this event than there were on Woolwich Town Centre but this is likely to be, in part, due to its location.

Greenwich Peninsula West: Thursday 23rd February

- 3.10 This event took place from 3-8pm on Thursday 23rd February in the Delta Room at The Forum @ Greenwich. Two presentations were held on the Greenwich Peninsula West masterplan at 4pm and 6.30pm.
- 3.11 Approximately 15 people attended the afternoon presentation and 5 people attended the evening presentation.
- 3.12 There was a range of interests in attendance, including a number of local interest groups residents and businesses. Cllr Mills was also in attendance.
- 3.13 There were a number of questions and concerns raised, particularly relating to concerns from businesses over potential relocation and the proposed density of any development on the site. Questions were also raised regarding a future tenant for the proposed multi-use arena, the exact nature of smart wharves and whether these mean taking aggregates to outer London just to bring them back in again, and the importance of the Thames path.

Greenwich Peninsula West: Saturday 25th February

- 3.14 This event took place from 10-2pm on Saturday 25th February in the Delta Room at The Forum @ Greenwich. One presentation was held on the Greenwich Peninsula West masterplan at 11am.
- 3.15 Approximately 7 people attended the presentation and approximately 6 further people dropped in throughout the duration of the event.
- 3.16 There were a range of interests in attendance, including local interest groups, residents and businesses. Cllr Mills was also in attendance.
- 3.17 A number of individual questions were raised throughout the course of the event, including who would occupy the Stadium, had the Borough considered approaching UCL who are looking to develop an East London campus, had consideration been given to developing a river crossing to Canary Wharf (a ferry or footbridge) and where would the education facilities serving the development be located. Some people also believed that the consultation process had been inadequately publicised.

Woolwich Town Centre/Charlton Riverside: Saturday 3rd March

- 3.18 This event took place from 10am-2pm on Saturday 3rd March in The Gallery at the Woolwich Centre. A presentation was held on both the Woolwich Town Centre and Charlton Riverside masterplans at 11am.
- 3.19 Approximately 35 people attended the presentation and a number of others dropped in throughout the event.
- 3.20 There was a range of interests in attendance, including a number of local interest groups, residents and businesses.
- 3.21 There were a wide variety of questions and concerns raised on no one particular theme. One resident asked how the image of Woolwich would be changed and others asked about the leisure centre and where in the Town Centre this might go. A representative from the church owning the Gala Bingo site was also in attendance and queried the plan's proposals for this to be used for a cinema or other entertainment uses.

Eltham Town Centre: Saturday 3rd March

- 3.22 This event took place from 1-5pm on Saturday 3rd February in the Eltham Centre. A presentation was held on the Eltham Town Centre masterplan at 2pm.
- 3.23 Approximately 30 people attended the presentation and large number of other people dropped in throughout the duration of the event.
- 3.24 There were a range of interests in attendance, including local interest groups, residents and businesses.

- 3.25 A number of individual questions were raised throughout the course of the event. A number of concerns were raised over the proximity of proposed development to residential properties on Archery Road and Dobell Road. A number of people also asked for more detail on the scale and heights of buildings proposed. There were also some concerns raised over how the needs of pedestrians and car users would be balanced and whether any feasibility studies had been done to assess how the plans would work from a transport perspective.

Woolwich Town Centre/Charlton Riverside: Monday 5th March

- 3.26 This event took place from 2pm – 7pm on Monday 5th March in Woolwich library. A presentation was held on both the Woolwich Town Centre and Charlton Riverside masterplans at 3pm.
- 3.27 Approximately 45 people attended the presentation and a number of others dropped in throughout the event.
- 3.28 There was a range of interests in attendance, including a number of local interest groups, residents and businesses.
- 3.29 There were a variety of questions and concerns raised. With regard to Woolwich Town Centre, many of these focussed on the loss of employment land proposed at Arsenal Way as well as queries regarding the relocation of the leisure centre. Regarding Charlton Riverside, queries were raised regarding where existing businesses would be relocated to and how this change would be delivered. Additionally, there were concerns over the siting of the secondary school on a busy main road and the suggestion of a 'green bridge' to cross the Woolwich Road between Maryon Wilson Park and Barrier Park was proposed.

4 Meetings Summary

- 4.1 **GPRL:** a meeting was held on Thursday 23rd February to discuss the Greenwich Peninsula West masterplan
- 4.2 **Newham Council:** a meeting was held on Tuesday 28th February to discuss the Woolwich Town Centre masterplan. No significant issues were raised.
- 4.3 **GLA:** a meeting was set up for Wednesday 29th February to discuss the masterplans, but was unfortunately cancelled by the GLA
- 4.4 **Charlton Society, Charlton Riverside Action Group, Charlton Central Residents' Association and Charlton Rail Users Group:** an informal meeting was held with Roden Richardson and David Gardiner to discuss the masterplans. Additionally, on Monday 5th March at Charlton Liberal Club, a further meeting was held, at which there were approximately 50 people in attendance.

- 4.5 **Greenwich Environment Forum/ Just Space Network:** a meeting was held on 6th March, organised by Greenwich Environment Forum and the Just Space Network and attended by approximately 10 other residents from across the Borough.

Summary of Responses and Key Changes Proposed

- 4.6 In overall terms there was considerable support for the proposals. Approximately 20 respondents expressed concern over the length of time taken for the consultation, which was undertaken over a four week period. In general best practice for consultations is considered to fall between four and six weeks, therefore the length of the consultation is not considered to be a material issue, as evidenced by the engagement with the process. Some concern was expressed in terms of the consultation being premature due to the lack of an adopted Core Strategy. The Council is in the process of finalising its Core Strategy and it will be updated to reflect the masterplans.
- 4.7 For Woolwich Town Centre, 52 responses (plus a petition of 268 regarding the Gala Bingo site) to the consultation were received. This included representations from local businesses within site area 3 'Arsenal Way', Berkeley Homes, Powis Street Estates, Christ Faith Tabernacle Church and the GLA.
- 4.8 For Charlton Riverside, 54 responses to the consultation were received. This included representations from the Charlton Riverside Action Group, businesses operating within the masterplan area, local resident associations, individual residents, the PLA and the GLA.
- 4.9 For Peninsula West, 38 comments were received on the Peninsula West masterplan. This included responses from wharf operators, major land owners (including Morden College Trust, Greenwich Peninsula Regeneration Ltd / Quintain and the HCA) and the PLA and GLA.
- 4.10 For Eltham Town Centre, 51 consultation responses have been received to date. These include a higher percentage from local residents than for the other SPDs being consulted on, as well as representations from Marks and Spencer and other local businesses, the GLA and statutory consultees.
- 4.11 A summary of the responses received and the Council's subsequent response and changes made to the masterplans are detailed below.

Response	Council Response/Proposed Change
Eltham Town Centre	
<ul style="list-style-type: none"> • Concern that wider pavements will reduce traffic capacity on the High Street. • Need highlighted for sufficient car parking within the town centre. • Eltham Church of England School incorrectly referred to as Roper Street School. • Requirement for further consultation regarding the potential relocation of Eltham Church of England Primary School. • Concern about a lack of reference to Tudor Barn and Well Hall Pleasaunce in the masterplan. • Objections from residents to new development directly behind their gardens around “Orangery Square”. 	<ul style="list-style-type: none"> • Text referring to the Eltham High Street public realm improvements to be updated to indicate that existing traffic capacity would be maintained within any proposals. • No change made – the masterplan seeks to retain sufficient car parking within the town centre through improvements to existing car parks. • All references to the name of Eltham Church of England Primary School corrected. • Additional text added to the masterplan stating that “further consultation on the potential to relocate Eltham Church of England Primary School will be required”. • Whilst outside the masterplan boundary, further reference to Tudor Barn and Well Hall Pleasaunce will be added to the masterplan. • Masterplan drawings amended to be less prescriptive in terms of layout of any development adjacent to Orangery Square. Text will make clear that plans are only indicative

<ul style="list-style-type: none"> • Concern about the potential loss of postal collection services if the Royal Mail sorting office is relocated. • Concern regarding a lack of information on acceptable building heights in the town centre. • The GLA consider the inclusion of the potential DLR extension to Eltham as premature and request references are removed. 	<p>at this stage.</p> <ul style="list-style-type: none"> • No change – the masterplan is clear that the plans are indicative and would only take place if the Royal Mail choose to leave the site • Additional text included in the masterplan that the scale of new development should respect the existing character of the area • No change – the inclusion of the DLR is considered appropriate and while aspirational would assist in supporting the potential for growth.
<p>Greenwich Peninsula West</p>	
<ul style="list-style-type: none"> • Strong support for DLR extension. • The HCA supports the overall masterplan vision. • Support for improvements to the riverside walk. • Need for improved links across the A102 highlighted. • Scepticism about a second arena close to the O2 and questions about how this would be funded. Concern from Charlton Athletic FC regarding the possible 	<ul style="list-style-type: none"> • Comments noted. No change required. • Comments noted. No change required. • Comments noted. Existing river path through Victoria Deep Water Terminal is now also to be shown on plans. • Additional text to be included referring to the importance of improving links across the A102. • No change required. The plans set out the Council's vision for the area and further detail on the delivery of this will be subject to further consultation.

<p>future use of the arena.</p> <ul style="list-style-type: none"> • Concern about public transport links in relation to a second arena and the need for coordination of events at the O2. Concern that masterplan does not do enough to alleviate traffic problems on the Peninsula and concern over how DLR and GWT will be delivered. • Need for additional education facilities indicated given the planned population growth. • Concern regarding the lack of a masterplan boundary and that land within Greenwich Peninsula Regeneration Ltd's consented masterplan should not be included. • Concern that HSE constraints regarding gas holders have not been addressed. • The PLA and GLA highlighted the need to retain safeguarding of the wharves and the important role of wharves in general. Bay wharf should also be retained as an important boat yard. 	<ul style="list-style-type: none"> • Comments noted. Detailed transport assessments would be required as part of any proposal and subject to further consultation. • Additional education facilities are identified as one possible use. • Masterplan boundary to be included, to clarify what is already permitted. • Intention for the gasholder site to be clarified and make clear that plans could progress whether or not the structure of this is retained. • Tunnel Wharf to be shown as: "Currently safeguarded wharf that the Council considers has potential for future release". The arena would only be delivered on the basis that this wharf is released from safeguarding. Masterplan drawings to be updated to show Bay Wharf as retained and protected.
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<ul style="list-style-type: none"> • Lack of support for 'smart-wharf' concept. • The GLA are concerned about the quantum of SIL that is proposed to be released and indicate that a full employment land review should be undertaken by the Council • The GLA consider the inclusion of the potential DLR extension as premature and request references are removed. 	<ul style="list-style-type: none"> • All references to 'smart-wharves' to be removed. • Industrial area to be shown as industrial only and not mixed use. This will be retained as SIL and extended slightly. Buffer between industrial and A102 to be removed and retained as industrial use. • The inclusion of the DLR is felt to be appropriate. Locations of proposed DLR stations have been updated to reflect latest study
Charlton Riverside	
<ul style="list-style-type: none"> • Support for a larger park close to the Thames Barrier. • Support for a new school but concern regarding its position adjacent to Woolwich Road. • The Charlton Riverside Action Group (CRAG) supports the main thrust and key features of the masterplan. CRAG would also advocate: <ul style="list-style-type: none"> • Greater integration of the Riverside area with the rest of Charlton • Improvements to Charlton Rail Station and its immediate surroundings • A green bridge linking Maryon Wilson Park to the expanded park within the masterplan area • Improvements to the Woolwich Road 	<ul style="list-style-type: none"> • Comment noted. No change required. • The proposed education use to be described as set back from Woolwich Road. • The plan will give more detail on the potential downgrading of Woolwich Road and improved links across it. • Links to transport hubs will form part of any plans brought forward. • At Maryon Wilson Park, an improved crossing across

<ul style="list-style-type: none"> • Concern about impact on existing businesses within the masterplan area. • Powis Street Estates requested that an objective of the Charlton Riverside Masterplan is to help secure investment in Woolwich. • The GLA agree that the intensification of residential uses in the Charlton Riverside Opportunity Area is in line with the London Plan which sets out the potential for a minimum of 3,500 new homes and 1,000 jobs in the area. • The GLA are concerned regarding the quantum of SIL proposed for release in the masterplan, and recommend the Council complete a full employment land review to assess this fully. • The PLA and GLA highlighted the safeguarded nature of Riverside Wharf and the importance of wharves in general. • 'Smart wharves' concept is not supported by wharf operators, the PLA or the GLA. • The PLA state concern over the 'potential marina' shown on the plans, which is likely to conflict with other river uses such as the Greenwich Yacht Club and Charlton Bargeworks 	<p>Woolwich Road could take the form of a green bridge.</p> <ul style="list-style-type: none"> • Reference to be added to delivery section regarding consulting with businesses in the future • Text added to highlight the relevance of Woolwich Town Centre • Comment noted. No change required. • The industrial area has been extended within the masterplan and reference added that the new residential neighbourhood will be developed gradually and contain a mix of uses. • Riverside Wharf to be included on masterplan drawings and noted as having potential for relocation in the future, into the industrial area. • All references to 'smart-wharves' to be removed from the masterplan. • The plan will include further reference to public activities at the riverside, emphasising the importance of the Thames Path. Reference to a 'potential marina' will be removed. Leisure and commuter (Thames Clipper) uses
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	will be encouraged on the river.
Woolwich Town Centre	
<ul style="list-style-type: none"> • Support for improving links to the river. • Support for the proposed Conservation Areas. • Support from Powis Street Estates for the masterplan vision and objectives. • Support from Berkeley Homes for the masterplan vision in general. • Queries have been raised over an appropriate alternative site for the Waterfront leisure centre • Significant level of concern about loss of employment within the Royal Arsenal Business Park and the impact on existing businesses. This is viewed by many as being a successful business area offering important modern facilities. • Christ Faith Tabernacle Church objects to the Gala Bingo building being used for 'cinema or other suitable leisure/entertainment use'. An email petition has been received on this, with approximately 268 responses so far. 10% of these respondents noted that they live within the Borough. • The GLA accept Woolwich growing to become a Metropolitan centre as an appropriate response to the 	<ul style="list-style-type: none"> • Comment noted. No change required. • Comment noted. No change required. • Comment noted. No change required. • Comment noted. No change required. • A new alternative site for the Waterfront leisure centre will be sought in close proximity to the new public squares • Reference to Arsenal redevelopment as "mixed use residential led" development altered to "mixed use development", to allow for a more varied mix of uses, including retention of employment. • Comments noted, but not supported. This site forms the entry to the commercial centre of Woolwich and should support town centre commercial or leisure use. • Comment noted. No change required.

<p>DLR extension and Crossrail.</p> <ul style="list-style-type: none"> • The GLA request that references to Greenwich Waterfront Transit are altered to 'improvements to bus services'. • Concern has been raised over the timescales set out in the delivery and phasing section as being too rigid 	<ul style="list-style-type: none"> • GWT is now referred to as 'Waterfront Transit' • Specific dates within the phasing section have been removed, to state that phases will come forward over a 15-20 year period
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Appendix I

5 Full Responses

5.1 The following pages provide a list of formal comments received on the masterplan during the consultation. Comments have been summarised as appropriate.

Charlton Riverside

ID	Name	Organisation	Comments
1	mr peter lewis	MD lewis travel	<p>I can see the principle of the plan but this is /has and has always been an industrial area. There is no mention where the business are going to relocate to? We have already been driven out of 2 sites in Greenwich in the last 20 years due to "redevelopment" so is the intension to drive all businesses out of Greenwich? The sites that Greenwich Council has recommended in the past would not entertain us as an industry and there are numerous other businesses in the Thames Barrier Area that would have difficulty relocating due to being "dirty" industries.</p> <p>I welcome your comments and proposals</p>
2	Rev Jeremy Fraser		<p>i was surprised to see such depth of work had already been done. i cannot understand how the depressed areas around the thames barrier have not been improved already. I suspect that this was due to holding onto the old industries and uses that are tired and out of date. the area would be lovely to live in due to the parks and the river. Please can the housebuilders be ones that sell in the uk so that the problems of GMV are not repeated here (not many living there long term as the flats are bought to rent not live in)</p>
3		Ramac Holdings Limited	<ul style="list-style-type: none">• Consultation on this Masterplan is premature in advance of publication of the Core Strategy Development Plan Document and the Land Allocations Development Plan Document, particularly as the Masterplan (page 33) acknowledges that SPDs cannot be used to allocate land for specific purposes and the Masterplan cannot demonstrate what provision is being made in the Borough for the relocation of uses/businesses that will be displaced in the delivery of the Council's vision for the area.• The Masterplan should include a plan on an OS base clearly identifying the boundaries of the area covered by the Plan. This should include land on both sides of Warspite Road.• The proposal to provide an active frontage on Woolwich Road is welcomed. This should include the retention of vehicular access at Ramac Way.

ID	Name	Organisation	Comments
			<ul style="list-style-type: none"> The presumption against additional retail development is noted but this should be reconsidered such that the possibility is not excluded for the life of the plan lest circumstances change. The redistribution of retail use in the plan area should not be excluded.
4		Costco Wholesale	<p>This representation is submitted on behalf of Costco Wholesale UK Ltd (Costco) who operate a number of wholesale warehouse clubs throughout the country, typically located on employment land. Costco operates sui generis membership warehouses and was created to serve the wholesaling needs of the small to medium sized business owner. At Costco, businesses can purchase products at wholesale prices, which are significantly lower than those of traditional sources of distribution. Businesses can obtain most of their inventory needs from under one roof. Each warehouse sells a wide range of products, although the variety within each product range is limited. This enables Costco Wholesale to serve a wide range of businesses, providing a core range of products at low prices.</p> <p>Costco is a reputable employer and would assist Greenwich in achieving their Economic Prosperity objectives. The level of jobs provided by Costco compares favourably in employment density levels to traditional B Class Uses. The company provides local people with a broad range of quality jobs that reflect the unique nature of Costco's operations. In addition there would be indirect job creation through the support given to small local businesses.</p> <p>Overall in the UK, over 90% of the jobs created by a new Costco are filled by locally recruited staff. Throughout the company, staff are encouraged to undertake training and to improve their positions. 85% of Costco's current managers are home grown having worked their way up from hourly paid positions. Positions range from craft and operative jobs for which specialist training is given, to managerial and supervisory jobs and unskilled jobs, which provide a point of entry for those who have little or no qualifications or training.</p> <p>The benefits of a warehouse club such as Costco are that the positive impacts spread throughout the local economy. Costco's target customer is the small and medium businesses and many of these can be found in town centres. They include;</p>

ID	Name	Organisation	Comments
			<ul style="list-style-type: none"> • Independent Retailers • Food and drink outlets such as restaurants and sandwich shops • Service outlets such as small estate agents, accountants, garages and professional firms • Independently owned hotels, guest houses etc <p>Costco can therefore make a significant contribution to the health of the local economy and, particularly to small businesses that are otherwise forced to pay a premium for small purchases from traditional wholesale sources. Costco's prices and its range of products are unique in this respect.</p> <p>Costco has been seeking representation within Greenwich for over 10 years and has been unable to secure a site due to demand for housing development or landowner expectations of retail value. The Charlton Riverside area is an area suitable for a Costco development due to transport links and the location of businesses, Costco's core membership base. The Charlton Riverside is identified as an Opportunity Area within the London Plan. It is also designated as a Strategic Industrial location (SIL). Suitable uses in Strategic Industrial Locations are set out with the London Plan and include general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities, wholesale markets and other industrial related activities. Costco Wholesale has been found to be an appropriate use for SIL.</p> <p>Greenwich is a Borough which is classified by the GLA Industrial Capacity SPG as a limited transfer Borough. The Draft Core Strategy and the Charlton Riverside Masterplan propose that the area of land allocated as SIL is significantly reduced. Costco considers that this may further reduce their ability to find a site and achieve representation within the Borough.</p> <p>Representation</p> <p>Costco Wholesale objects to the Charlton Riverside Plan in its current form and seeks the reinstatement of land allocated for SIL within Charlton Riverside and for the Council to recognise that there is demand for SIL in this location from companies who have</p>

ID	Name	Organisation	Comments
			<p>the ability to offer significant employment.</p> <p>We recognise that where sites are currently in retail use, there is little opportunity for these uses to be reverted to SIL, but where sites are not currently in retail use the SIL, such as Makro, the allocation should not be changed.</p> <p>Costco therefore requests that the Council considers the reinstatement and introduction of additional allocations of land for SIL in the recognition that sui generis uses suitable for SIL, such as Costco Wholesale, may provide a buffer between the identified wharfs and the proposed residential development whilst maintaining an appropriate level of SIL in conformity with the London Plan.</p>
5	Katy Ellsmore		<p>I've read the masterplan and it all looks very nice but I really don't feel theres much there. It feels like theres not much concrete there at all. Theres no real dates and I found it strange that LXB hadn't been involved in these plans at all. Why weren't there any discussions with them? Surely its vital to speak to them in the planning process.</p> <p>What I don't really understand is whats going to happen after the consultation period? Will work start once its approved?</p> <p>Secondly, will there be a review of how the roads will deal with extra traffic and what improvements will be made to public transport? I live on Woolwich Road and it is gridlocked every day so something will need to be done about this. Theres no mention of what will be done about the roundabout under the flyover, this doesn't work well at the moment, so this must be resolved in line with new retail sites and homes.</p> <p>I'd really like to see some more concrete plans and a timeline because at the moment it just seems like a marketing ploy for Greenwich council.</p> <p>I'd be very disappointed if something didn't happen soon as this area desperately needs redevelopment and it always feels like the council forgets about this area what with the unresolved traffic issues, constant litter problems which never seem to get solved, things like broken street signs never getting fixed etc.</p>

ID	Name	Organisation	Comments
6	Andrew Donkin		<p>There are a few other factual errors in the MasterPlan which could do with correcting.</p> <p>1/ The document refers to the 'Thames Barrier Park' all the way through. (Pages 11, 13, 17, 18, 20, & 23.) I don't think it means to. Thames Barrier Park is north of the river in Canning Town.</p> <p>I think the document means to refer to 'Barrier Gardens' and 'Barrier Park'. Barrier Gardens, which is council land, only runs down to the old pub which is now a vets. The land on the other side of the pub (and garage), that runs down to the river, the green space and car parks, is Barrier Park owned by the Environment Agency.</p> <p>2/ There are four references (three on maps and one full page photo) to being able to see the spire of All Saints Church on very flat Blackheath from the river. Unless the consultants have invented a machine that can bend light, this is unlikely. The full page photo on page 50 probably shows the gothic St John the Evangelist on Stratheden Road, Blackheath Standard - but it certainly isn't All Saints on the heath.</p> <p>3/ Page 32 has a photo taken in Barrier Gardens captioned as being in Maryon Wilson Park (where the animals are.)</p> <p>4/ The proposed landscaping near the Barrier may need to take into account the legal requirement whereby: "The land is protected from development under the Thames Barrier Act in the event of an emergency whereby working space may be required adjacent to the Barrier for repairs." I'm sure you know the exact conditions.</p> <p>It might be worth getting the first three facts corrected before someone else notices.</p> <p>I enjoyed hearing the guys speak about the plans last night. Please do pass on the above suggestions to them. Many thanks.</p>
7	Mr Patrick Blake	Highways Agency	<p>Thank you for your email on 31 January 2012 inviting the Highways Agency (HA) to comment on the Masterplan Consultations for Woolwich Town Centre, Eltham Town Centre, Charlton Riverside and Greenwich Peninsula West. The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. We have reviewed the Masterplans and do not have any comment at this time.</p>
8	MR ALAN MURRELL		<p>AFTER ATTENDING THE MEETING AT CHARLTON FC WE BECAME VERY CONCERNED BY THE LANGUAGE YOUR CONSULTANT USED WITH REFERENCE TO THE AREA WE HAVE OUR BUSINESS IN NAMELY, WESTMOOR STREET. THE WORDS USED TO DISCRIBE THE AREA WERE THAT THE LAND IN QUESTION WAS OF LOW VALUE, INFERING THAT</p>

ID	Name	Organisation	Comments
			<p>THE LAND WOULD BE PURCHASED VERY CHEAPLY. WE HAVE RUN OUR COMPANY FROM TWO SITES IN CHARLTON FOR THE LAST 27 YEARS AND EMPLOY 6 PEOPLE FROM THIS BOROUGH INCLUDING TWO WHO WERE LONG TERM UNEMPLOYED,THE FULL TOTAL OF PEOPLE WORKING AT LEA VALLEY FOODS IS 12 IN NUMBER. WE ARE ALSO CONCERNED THAT ON INVESTIGATION WE HAVE FOUND THAT A GREAT NUMBER OF BUSINESS RESIDENTS HAVE NOT RECIEVED NOTICE OF THE PLANS FOR THE AREA AND WE ARE EXTREMELY CONCERNED THAT THE COUNCIL MAY BE TRYING TO BULLDOZE THIER PLANS THROUGH WITH OUT INFORMING EVERYBODY THAT HAS A RIGHT TO CONSULTATION ABOUT THE PLANNED PROJECT. WE CAN UNDERSTAND THE PLANS BENEFITS TO THE AREA,BUT WE ARE NOT HAPPY WITH THE WAY IT SEEMS INFORMATION IS BEING KEPT FROM NEED TO KNOW RESIDENTS.ALSO WHEN ASKED ABOUT CPOs THE TOPIC WAS HUSHED UP BY MOVING ON TO THE NEXT STAGE OF THE PLANS FOR WOOLWICH & ELTHAM.WHAT PROVISIONS ARE THE COUNCIL MAKING TO KEEP LOCAL BUSINESS LOCAL AND WHEN DO THEY INTEND TO START NEGOTIATIONS WITH BUSINESSES WITH REFERENCE TO LAND PURCHASE AND RELOCATION ALAN MURRELL LEA VALLEY FOODS</p>
9	Mrs Ann Galloway		<p>I welcome the regeneration of Charlton Riverside. I like the plans for Barrier Park but feel there should be a green bridge across the Woolwich Road. I also like the idea of a continuous and attractive river path.</p> <p>I feel the new housing should blend in with the predominantly brick Edwardian and Victorian style of most of Charlton. I think it should remain low rise with no more that 3 storeys if it not to ruin the vista from the other side of the river and looking down the hill.</p> <p>I feel some local industry should be encouraged but should be subject to demand and careful planning control. I like the idea of an artistc, cultural and educational slant. I also like the idea of introducing recycling engineering works and this area turning the waste from London, transported down the river,into new and exciting products.</p> <p>I am pleased that a new secondary and primary school will finally be built. I am , however, ecceedingly worried by the siting of the proposed secondary school. It appears to be on the busiest , noisiest , most polluted site you could possibly have chosen, which will undoubtedly endager childrens health and safety. Please put it further away from the main road and somewhere that children will not have to cross one of the busiest bits of road to get too.</p> <p>Improving the look and feel and facilities at Charlton Station would help that live up to the new surrounding developments. Downgrading the Woolwich Rd from Charlton Church Lane will help cohesion between the various bits of Charlton - and make it</p>

ID	Name	Organisation	Comments
			<p>safer to get to the retail park. This need s developing both in terms of access and attractiveness.</p> <p>The area at the Anchor and Hope and by the Barrier could also be made to be more attractive with more parking and other dining and entertainment possibilites, so that people would walk down there from the Village and also people might come from other areas to visit and enjoy the Riverfront.</p>
10	Mr David Poole	Manager Royal Mail	<p>We are instructed by our client Royal Mail Group Ltd (referred to herein as 'Royal Mail') to submit representations to the above Charlton Riverside Draft Masterplan SPD.</p> <p>1. BACKGROUND</p> <p>Royal Mail formerly Consignia Plc, is the successor to the former statutory corporation, The Post Office. Although its management operates independently, Royal Mail is wholly owned by the Government through the Secretary of State for Business, Innovation and Skills. Its services are regulated by Ofcom. Its letters business, Royal Mail, is the operator of universal postal service functions through the Royal Mail letter post delivery and collection services handling letters, postal packets, and high value (registered) packets. Royal Mail Group also operates Parcelforce Worldwide which is a parcels carrier. Post Office Ltd (a wholly owned subsidiary of Royal Mail) operates the national network of post offices and sub post offices.</p> <p>The United Kingdom letter post business has been fully liberalised since the Postal Services Act 2000 and Royal Mail now operates in a highly competitive market place. As such, it effectively operates like any other business and is continually seeking to find ways to improve the efficiency of its business (e.g. increased automation) and respond to the changes in communications technology (e.g. email and internet). Put simply, the nature of the mail industry has and continues to change and Royal Mail's real estate needs to respond accordingly.</p> <p>Royal Mail have a number of sites within the administrative boundary of the Royal Borough of Greenwich, including the following fall that both (appear to) within the Masterplan boundary:</p> <ul style="list-style-type: none"> ■ Charlton Local Depot (LD)/ Storage (ST), Bugsby Way, London, SE7 7SF; and ■ Greenwich and Charlton Delivery Office (DO), 25 Horn Lane, London, SE10 0DP. <p>It should be noted that both of the aforementioned sites are operational. As such, should any of the properties surrounding Royal Mail's sites be redeveloped, it would be vital that any new uses be designed and managed so that they are both cognisant of and sensitive to Royal Mail's operations.</p>

ID	Name	Organisation	Comments
			<p>2. REPRESENTATIONS</p> <p>Royal Mail generally supports the Council's vision and strategic objectives to transform the Charlton Riverside area into a new urban quarter connecting Greenwich Peninsula to Woolwich Town Centre, comprising a sustainable mix of uses including substantial residential uses focussed around an enhanced Thames Barrier Park.</p> <p>2.1 Charlton LD/ ST</p> <p>Charlton Riverside is largely an employment area with a mixture of industrial units and retail warehouses. We note that the Masterplan proposes a significant change in the land uses of the eastern part of the plan area, from predominantly employment to residential.</p> <p>On the 'Concept Plan' Royal Mail's Charlton LD/ST falls within an area identified for residential development within the plan period. Whilst Royal Mail generally supports the objectives for this area, we would like to remind the Council that Royal Mail's Charlton LD/ST is operational. As such, should Royal Mail's site be brought forward, the re-provision / relocation of Royal Mail's operations will be required prior to redevelopment of the site.</p> <p>Furthermore, we note that in order for Royal Mail's site to be brought forward for redevelopment, relocation will need to be viable for and commercially attractive to Royal Mail. The proceeds from the disposal of their site will need to yield both sufficient value to fund the purchase and fit-out of a new site and the relocation of their operations thereto. There will also need to be commercial attractiveness that would incentivise the business to relocate the operations. In addition, it would be essential that any new facility is provided prior to the demolition of the existing and/ or suitable temporary accommodation provided, if necessary, to ensure the continuity of service.</p> <p>2.2 Greenwich and Charlton DO</p> <p>We note that Royal Mail's Greenwich and Charlton DO may fall within the boundary of the Masterplan. However, unfortunately the boundary lines are not clear enough to confirm this, Grace Sim spoke with Hollie Gilbert from the Council on 1 March 2012 to clarify this position, however she was unable to confirm.</p> <p>Therefore, Royal Mail request from the Council clarification as to whether their Greenwich and Charlton DO falls within the Masterplan boundary and, if so, Royal Mail would like further details as to what is proposed within this area.</p> <p>2.3 Policy Considerations</p> <p>The requests set out above accord with:</p>

ID	Name	Organisation	Comments
			<ul style="list-style-type: none"> ■ Para 10 of Planning Policy Statement 3 (PPS3): Housing, which states that the planning system should deliver “a flexible, responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously-developed land, where appropriate”; ■ Para 36 of PPS3, which states that “in support of its objective of creating mixed and sustainable communities, the Government’s policy is to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure. This should be achieved by making effective use of land, existing infrastructure and available public and private investment”; ■ Para 44 of PPS3, which identifies that “in developing their previously-developed land strategies, Local Planning Authorities (LPAs) should consider a range of incentives or interventions that could help to ensure that previously-developed land is developed in line with the trajectory/ies. This should include...considering whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development”; ■ Para 54 of PPS3, which requires sites to meet the following tests: <ul style="list-style-type: none"> ▪ Suitable: The sites would offer a suitable location for development and contribute to the creation of sustainable mixed communities on previously developed land; ▪ Available: The sites would be available for development within the plan period, subject to the suitable re-provision/relocation of Royal Mail’s operations; and ▪ Achievable: Development could be delivered on the sites within the plan period; ■ Planning Policy Statement 4 (PPS4): Planning for Sustainable Economic Development, which details that LPAs should plan positively and proactively to encourage economic development, in line with the principles of sustainable development. In particular, PPS4 states that LPAs should develop flexible policies which are able to respond to economic change and notes the need for co-ordination with infrastructure and housing provision; and ■ Para EC.2 (d) of Policy EC2 (Planning for Sustainable Economic Growth) in PPS4, which states that LPAs should “seek to make the most efficient and effective use of land, prioritising previously developed land which is suitable for re-use”. <p>Further, we note the Government’s draft National Planning Policy Framework (NPPF), which is the most up-to-date statement of national policy, albeit in draft form. In particular, we note that it:</p>

ID	Name	Organisation	Comments
			<ul style="list-style-type: none"> ■ states that development management should “foster the delivery of sustainable development, not hinder or prevent development”; ■ requires investment in business “not to be over-burdened by the combined requirements of planning policy”; ■ requires local planning policy to “have a clear understanding of business needs within the economic markets operating in and across their area”; and ■ requires LPAs to “avoid unnecessary conditions or obligations, particularly when this would undermine the viability of development proposals”. <p>We reserve the right to amend or supplement these representations at a later date if necessary. We look forward to receiving confirmation that Royal Mail’s representations have been received and duly registered. In addition, Royal Mail would be grateful if the Council would keep us updated as to the progress of the Masterplan SPD.</p>
11	Ms Linda Pound	Individual Resident	<p>I wish to make the following points about the Charlton Riverside masterplan. I particularly welcome suggested increases in parkland but would like to see a much greater emphasis on more widespread planting and other strategies to improve air quality. While I recognise the need for improvements in the area I regret the fact that no attempt has been made to link the planned new community to existing Charlton residents. There is a danger that the planned development would end up being a ghetto divorced from other neighbouring communities. Within Charlton as a whole I would like to see:</p> <ul style="list-style-type: none"> • improved links between forms of public transport • a more pedestrian-friendly road network • an urgent review of the area's need for schools now • a more coherent view of planning in the area • more recognition of Charlton as a cohesive community with a history and culture <p>Within the area to be developed I would like to see:</p> <ul style="list-style-type: none"> • low-rise, low-density housing • retail provision which doesn't assume that I will have to travel to Woolwich to buy anything more than a postage stamp • an evaluation of existing employment opportunities within the area

ID	Name	Organisation	Comments
			<ul style="list-style-type: none"> strong linkage of transport with existing provision - thus strengthening both.
12	Linda Pound	Chair Charlton Central Residents Association	<p>Charlton Central Residents' Association (CCRA) welcomes the aspiration to improve the appearance and cohesiveness of what is currently a largely unattractive stretch of land. Plans for schools, improved and extended parkland and a revitalised area of housing and employment can only be applauded. The increased use of the river as a resource, implicit in the plan, is also welcomed.</p> <p>Despite the positive vision, CCRA has a number of reservations about the plan. Chief of these is the sense that Charlton appears to exist in the planners' minds only in so far as it is a 'missing piece of jigsaw' between Greenwich and Woolwich. While the focus is on creating cohesion between west and east parts of the borough, there is no sense of the need to link north and south, to link Riverside Charlton to existing parts of Charlton. The fact that Woolwich Road acts a barrier between these two parts of Charlton is not explored. This lack of cohesion needs to be addressed in terms of community and transport.</p> <p><i>Community</i></p> <ul style="list-style-type: none"> The benefit to people of a sense of community. Any new development would be strengthened by links with the existing Charlton which has a strong sense of history and strong roots. Links would be supported by: <ul style="list-style-type: none"> Recognition of the need for a secondary school now. As Charlton Riverside grows, additional primary and secondary places will be needed and will be able to act as a community hub. Creating pedestrian-friendly links between old and new Charlton and promoting/ safeguarding a variety of shops and cafés throughout the area. An evaluation of the contribution of existing local businesses as employers and amenities to ensure that important elements of community life are not needlessly swept away.

ID	Name	Organisation	Comments
			<ul style="list-style-type: none"> • The importance of sustainable employment opportunities. We strongly support a commitment to local jobs. While recognising that some current local employment is of poor quality and precarious, it would seem vital for community cohesion that viable existing businesses are supported alongside the creation of new opportunities. • The benefit to people of clean air. The need for improved air quality is recognised in the planned increase in parkland - but more is needed. <ul style="list-style-type: none"> ○ Placing schools at busy junctions ignores the particular impact of poor air quality on children. ○ There is likely to be increased transport, private and goods traffic. Green measures such as green walls and lavish tree planting will be essential to combating the high levels of pollution which settle in this area. ○ Increased and reliable public transport will also be essential in any efforts to reduce traffic. <p><i>Transport and traffic</i></p> <ul style="list-style-type: none"> • A determination to put in place measures which would improve transport throughout Charlton, rather than focusing narrowly on the riverside area. This would include: <ul style="list-style-type: none"> ○ Measures to improve traffic flow at the junction of Woolwich Road and Charlton Church Lane. This could be achieved by rephasing traffic lights, reducing the number of restrictions for motorists at the junction, and improving access for pedestrians and cyclists. ○ Measures to deal with increased traffic flow at the junction of Victoria Way and Woolwich Road. This might involve new traffic lights, moving the pedestrian crossing and/or creating a roundabout. ○ Increased use of river transport and revitalisation of the waterfront transit scheme ○ Making use of the little used Angerstein railway line ○ Improvements at Charlton station to deal with greatly increased numbers of commuters ○ Developing the area close to Charlton station. A transport hub outside/ opposite the station could be developed in order to deal with increased use. This would address the need to rationalise the fragmented links between buses, trains and underground. ○ Much greater consideration of the needs of pedestrians is essential. We would like to see pedestrians being given

ID	Name	Organisation	Comments
			<p>level access across Woolwich Road at key points including the crossing close to Charlton Station. If necessary this should involve building road tunnels under new priority pedestrian walkways.</p> <p><i>The built environment</i></p> <p>CCRA also has concerns about the built environment and wishes to make the following comments:</p> <ul style="list-style-type: none"> • Good quality low density, low rise housing supported by sustainable employment opportunities are vital in establishing a viable cohesive community. A maximum of 4 storey buildings would be in keeping with existing buildings and is of fundamental importance if the needs of families are to be addressed. We hope it will remain a core part of the plan and not be undermined over time by the potential for much greater interest from the building industry for 12 or 14 storeys. • To support increased employment opportunities, well serviced, sustainable and modern equipment and buildings will be necessary over time. • The section on delivery leaves many questions unanswered. It refers to 'contaminated land remedial costs'. Is the extent of contamination known? Or will it require prior assembly and demolition in order to ascertain the degree of contamination, in particular in the housing zone? It says 'site and land assembly would be significant issues' With many hundreds of separate leases in the riverside area it could delay any progress in some parts for many years. What agency will start to address this issue? It also refers to the need to raise investment capital at an early stage to fund new infrastructure. If contamination and land assembly have not already been dealt with this would be very difficult to secure from the private sector. All this suggests that public sector powers and resources will be needed, well beyond the capacity of the local authority. This is not addressed at all. • Provision for utilities in the riverside area would require comprehensive upgrading. • There is little indication of how the large number and range of landowners in the riverside area can be drawn into a single cohesive development plan. • While a more coherent retail zone has some merit, Charlton residents have been expecting exciting retail developments in the next year or two – the plan appears to put this in doubt and further discussion and clarification is needed. • We would like to see an unimpeded river walk. It would be beneficial if the Thames path between the Thames Barrier and Warspite Road could run alongside the river. • A continuation of Charlton Church Lane across the Woolwich Road could provide a major, integrated artery for the whole

ID	Name	Organisation	Comments
			<p>of Charlton. Transport changes along the lines proposed above and architecture which is sympathetic to the largely Victorian appearance of that area would improve the sense of linkage.</p> <ul style="list-style-type: none"> The sightline from the river to St Luke's church in Charlton Village is of historic interest and should be protected. <p>CCRA, along with other local organisations, wishes to see improvements in the area. As the masterplan becomes reality we would like some reassurance that the needs of existing Charlton residents will be addressed. Charlton is much more than its riverside and much more than a missing jigsaw piece between Greenwich and Woolwich. We would welcome some detailed consultation and research so that plans more closely reflect both the needs and aspirations of those who already live in the area. There may, for example, be widespread support for mixed use rather than closely zoned development. Similarly, there is definitely a view amongst residents that Charlton needs a secondary school more urgently than the suggested phasing indicates. These and other similar issues deserve much more detailed consideration.</p>
13	Ms Rose Freeman	The Theatres Trust	<p>The Theatres Trust is The National Advisory Public Body for Theatres. The Theatres Trust Act 1976 states that <i>'The Theatres Trust exists to promote the better protection of theatres</i>. It currently delivers statutory planning advice on theatre buildings and theatre use through the Town & Country Planning (General Development Procedure) (England) Order 2010 (DMPO), Articles 16 & 17, Schedule 5, para.(w) that requires the Trust to be consulted by local authorities on planning applications which include <i>' development involving any land on which there is a theatre .'</i></p> <p>We only have a few comments to make concerning future entertainment provision in these four areas.</p> <p><i>Charlton</i> : Objectives – we support the introduction of non-traditional employment uses such as the creative arts in refurbished buildings at the Westminster Industrial Estate.</p>
14	Ms Lucy Owen	Planning Officer Port of London Authority	<p>The PLA considers that the production of this document is premature given that the final version of the Core Strategy will not be available until Summer 2012. The Core Strategy will then be the subject of an Examination in Public and the Inspector will publish his/her findings. The approach set out in the Core Strategy is a departure from that in the current UDP and there is no certainty that it will be accepted by the Inspector. As highlighted in Chapter 8 of the SPD, <i>"SPD's provide further detail on the implementation of particular policies and proposals contained in the Development Plan. SPD's must relate to policies or proposals in the Development Plan and they may not be used to set out new policies nor to allocate or re-designate land for specific purposes."</i> As such the PLA would assert that the production of a masterplan document which accords with a draft Core Strategy runs the risk of producing a document which</p>

ID	Name	Organisation	Comments
			<p>will require substantial changes as the Core Strategy progresses, could potentially confuse members of the public and other consultees and will result in consultation overload.</p> <p>Turning to the detail of the document, the draft SPD includes a number of important riverside sites which are used for water related purposes. These include:</p> <ul style="list-style-type: none"> • Greenwich Yacht Club • Angerstein Wharf (a safeguarded wharf) • Murphy's Wharf (a safeguarded wharf) • Charlton Bargeworks <p>Riverside Wharf (a safeguarded wharf)</p> <p>Barrier Gardens Pier/Unity House/Thames Barrier Navigation Centre</p> <p>The approach to these sites is clear in the <i>London Plan</i>, with the prioritisation of the uses of the waterspace and land alongside it for water related purposes (policy 7.24), the protection of existing facilities for waterborne freight traffic, in particular safeguarded wharves should only be used for waterborne freight handling use (policy 7.26) and the protection of existing facilities for waterborne sport and leisure and the protection of waterway support infrastructure (policy 7.27). The approach set out in the SPD does not accord with these policies and results in an unsound SPD.</p> <hr/> <p>The PLA would question the evidence base used to develop the SPD. No discussions were held with the PLA which is surprising given the PLA's interest and landownership in the area. The PLA would assert that the SPD is fundamentally flawed as it does not accord with National Policy and Guidance or <i>London Plan</i> policy. This results in an unsound SPD. Particular concerns are set out below:</p> <p>Greenwich Yacht Club</p> <hr/> <p>It is stated on page 48 that Greenwich Yacht Club is just outside the study area but its moorings and club house can be seen on the aerial photograph. The concept plan and Development Principles Plan then shows a 'potential marina'</p>

ID	Name	Organisation	Comments
			<p>extending out over the line of the yacht club. In the Development Principles Plan this marina extends over the entirety of the frontage of the safeguarded Angerstein wharf prohibiting any use of the river for the transport of freight.</p> <p>No detail is provided on the marina, it is just a line on the drawing and it is questioned on what evidence it was decided that a marina in this location would be appropriate. Where is the work that has been undertaken to look at the navigational, river regime and environmental implications of any marina? What work has been undertaken on the implications for Greenwich Yacht Club?</p> <p>Charlton Bargeworks</p> <p>Whilst the land associated with Charlton Bargeworks appears to be proposed to remain in industrial use any use of the river infrastructure would appear to be prohibited by a potential marina. It is also unclear what is meant by 'animate river frontage' and what the implications are of this for the Bargeworks.</p> <p>No detail is provided on the marina, it is just a line on the drawing and it is questioned on what evidence it was decided that a marina in this location would be appropriate. Where is the work that has been undertaken to look at the navigational, river regime and environmental implications of any marina. What work has been undertaken on the implications for Charlton Barge Works?</p> <p>The works in the river on the concept plan appear to be just that a concept and do not appear to reflect what actually happens on the river.</p> <p>As the Council will be aware, <i>London Plan</i> policy protects waterway support infrastructure like Charlton Barge Works and seeks for its enhancement and extension during LDF preparation. The Council's approach to Charlton Bargeworks does not accord with this policy and results in an unsound plan.</p> <p>Riverside Wharf</p> <p>Residential development/open space is shown on the safeguarded Riverside Wharf. This is an operational wharf. The <i>London Plan</i> is clear when it comes to safeguarded wharves that the redevelopment of a safeguarded wharf for other land uses should only be accepted if the wharf is no longer viable or capable of being made viable for waterborne freight handling. No evidence has been put forward to demonstrate that the wharf is not viable and given that it is in operational use for waterborne freight handling and the</p>

ID	Name	Organisation	Comments
			<p>Safeguarded Wharf Report considers the wharf to be viable, the PLA would assert that no such evidence would be available. Whilst consolidation/relocation could be investigated, again no evidence has been advanced setting out where the wharf would be relocated to and how any relocated wharf would have the same, if not better facilities and capacity.</p> <hr/> <p>Given the clear planning policy relating to safeguarded wharves and the fact that the SPD itself recognises that the Mayor is reviewing safeguarded wharves and is not proposing changes, it is questioned why Greenwich Council are.</p> <p>The Council's approach to Riverside Wharf does not therefore accord with planning policy and results in an unsound plan.</p> <p>Clipper Berth</p> <p>— A clipper berth is shown immediately downstream of the Thames Barrier. Again no evidence is provided on the suitability of this site for a berth and the PLA would have concerns about its proposed location due to its proximity to the Thames Barrier. In the text it refers to opportunities existing for the Barrier Gardens River Bus Stop. The clipper berth on the plans does not appear to match the location of Barrier Gardens Pier. In any event, Barrier Gardens Pier is in the ownership of the Port of London Authority who use it as an operational base. There is no river bus stop at Barrier Gardens Pier.</p> <p>Barrier Gardens Pier/Unity House/Thames Barrier Navigation Centre</p> <p>These important facilities are shown adjoining or within the creative industries/residential/historic quarter. These facilities are important for the safety of vessels</p> <p>navigating on the Thames and can involve 24 hour a day operations. It needs to be demonstrated that the long term retention of these facilities would be possible given the changes proposed in the area. Any loss of these facilities could have detrimental effects on the safety of vessels navigating on the Thames.</p> <p>Angerstein and Murphy's Wharves</p> <p>The document promotes smart wharves at Angerstein and Murphy's wharves. This appears to involve "maintaining river access at key industry locations whilst moving the more land hungry and heavy industry activities elsewhere." No detail is provided for example on where</p>

ID	Name	Organisation	Comments
			<p>the heavy industry activities would be relocated to.</p> <p>It is questioned what benefits this would have. If raw material is just brought into a site and it is then removed prior to any processing taking place, arguably this would have a bigger impact than undertaking the processing before onward distribution.</p> <p>The vast majority of wharves undertake some on-site processing activity and as highlighted in the Safeguarded Wharves Review <i>"while strictly speaking, separate from the transport function of the site, co-location of these processing activities on the wharf site is generally considered to be critical to the economic viability of both the wharf itself and also the river transport itself"</i></p> <p>The draft National Planning Policy Framework is also clear on the subject of wharves and associated storage, handling and processing. It seeks for the safeguarding of existing planning and potential wharfage and associated storage, handling and processing facilities for the bulk transport by sea or inland waterways of minerals including recycled, secondary and marine dredged materials. It also seeks to safeguard "existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material."</p> <p>The Council's approach to Angerstein and Murphy's wharves does not therefore accord with planning policy and results in an unsound plan.</p> <hr/> <p>The river, foreshore and Banks</p> <p>Reference is made to promoting and developing the river, its foreshore and banks as a public amenity with greater access to water based and waterfront activities. However, this appears to be at the expense of existing leisure facilities (Greenwich Yacht Club) and river related infrastructure (Riverside Wharf and Charlton Bargeworks). The Council's plans would therefore appear to not be capable of being implemented and they are contrary to planning policy.</p> <p>Care also has to be taken when referring to the foreshore as there are health and safety and environmental implications associated with unregulated access to the foreshore.</p> <p>Block Structure</p>

ID	Name	Organisation	Comments
			<p>The Council will be aware from its experiences with phases 3,4 and 5 of Greenwich Millennium Village that new developments need to be designed to minimise the potential for conflicts of use and disturbance. Any development that is proposed in close proximity to the safeguarded wharves should therefore include early discussions with the wharf operators and the PLA.</p> <p>Reference is made to retail and commercial acting as a buffer to Angerstein Wharf but what about Murphy's Wharf?</p> <p>Delivery</p> <p>The ability to deliver the SPD appears to be fundamentally flawed. The document itself identifies that "<i>issues for delivery particularly in later phases could include safeguarding of wharves.</i>" As highlighted above, the policy context relating to safeguarded wharves is clear and the SPD is not in accordance with this policy. Additionally, the Safeguarded Wharf review does not propose any changes to the safeguarded wharves. As such it would appear that the aspirations of the SPD are not capable of being achieved.</p> <p>River Connections</p> <p>It is stated there are several jetties (generally now disused). The PLA would dispute this, many of the jetties in the study area are used, including Angerstein, Murphy's, Barrier Gardens Pier, Riverside and Charlton Bargeworks.</p> <p>It is also stated that water freight continues today, albeit at reduced capacity. Within the study area is one of Europe's largest marine terminals!</p> <p>The facility for processing and distributing marine dredged aggregates in the western extents of the study area is two wharves, not one.</p> <p>Conclusions</p> <p>The PLA would reiterate that the SPD is premature, does not accord with National or <i>London Plan</i> policy or guidance, particularly in relation to the safeguarded wharves, waterway support infrastructure and the existing river related leisure facilities at Greenwich Yacht Club. As such the SPD is unsound.</p>

ID	Name	Organisation	Comments
15		Powis Street Estates (No.3) Ltd	<p>In principle, my client supports the Charlton Riverside Masterplan; in particular as it provides the opportunity to create high quality environments and connections between Woolwich Town Centre and Greenwich Peninsula. However, recognising that the land is designated as an Opportunity Area in the London Plan, the Masterplan should be more specific and intentional in ensuring that two of the objectives behind the Masterplan are to safeguard the attractiveness, vitality and viability of Woolwich Town Centre and; to secure more investment and to boost the profile of Woolwich Town Centre within London as a Metropolitan Centre.</p> <p>In safeguarding Woolwich Town Centre as a desirable destination, and in ensuring it attracts further investment the Masterplan should be clearer that large scale commercial development should be first provided in Woolwich Town Centre. In promoting good urban design, the Masterplan should also make it clear that large scale retail development (in traditional out of centre formats) with significant amounts of hardsurfaced areas for car parking etc would be contrary to its objectives and would be resisted.</p> <p>The Masterplan makes reference to Woolwich Town Centre in section 7 "Understanding the Place". This identifies the need to re-establish Woolwich as the main town centre in the borough. This reference should go further as the objectives should not just be "to re-establish" but to enhance and increase its status within the City.</p> <p>The Masterplan should cross-reference to the Woolwich Town Centre Masterplan SPD.</p> <p>The Masterplan, in Section 8 "Policy Context", should seek to influence and reverse the retail impact from high street type comparison retailers which "are trading very strongly and competing directly with Woolwich and Greenwich." These draw other retailers, customers and investors away from the town centres. The Masterplan should seek to address this. In Section 8, the Masterplan should also be more direct. Additional retail floor space in Charlton Park would not just "impede" the ability of Woolwich Town Centre to reach Metropolitan Centre status within the next 15 years, it would divert investment away from the town centre and hinder the regeneration of key sites within the town centre that are identified in the Woolwich Town Centre Masterplan. Without which, the Town Centre is unlikely to reach Metropolitan Centre status.</p>
16	R N Westell	Estates Manager -	We have been made aware of the Charlton Riverside Draft Masterplan SPD consultation by the Port of London Authority as this company operates one of the sites within the 'Aggregates Zone' at Angerstein Wharf. We would like to make the following

ID	Name	Organisation	Comments
		South East Aggregate Industries Uk Ltd	<p>representation</p> <p>Aggregate Industries occupy the land edged blue on the attached plan for the manufacture of asphalt and ready-mixed concrete using aggregates imported by rail. Our site forms part of a larger Safeguarded Wharf at Angerstein and Murphy's Wharves. Although we do not import materials by river, our site has been safeguarded as it has the potential to be used for intermodal rail/river cargo handling in the future. In any event, rail heads used for the handling of aggregates should be safeguarded as per Minerals Planning Statement I (MPSI), Paragraph 13, which states <i>inter alia</i> that mineral planning authorities should:</p> <ul style="list-style-type: none"> • Safeguard existing, planned and potential rail heads, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, particularly coal and aggregates, including recycled, secondary and sea-dredged materials. • Safeguard existing, planned and potential sites including rail and water served, for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material. <p>These policies are repeated in the draft National Planning Policy Framework (NPPF) at paragraph 102.</p> <p>While the SPD makes reference to the Safeguarded Wharves, clear reference to safeguarding of the Angerstein and Murphy's Wharves in the context of MPSI and the emerging NPPF needs to be made within the SPD. There is no mention of the importance of safeguarding in Section 3, which sets out the Masterplan objectives; there should be a clear objective to protect the Safeguarded Wharves from other forms of development.</p> <p>The SPD makes reference to the Safeguarded Wharves as 'smart wharves'. This is a term which seems to have been introduced in this document, appearing nowhere else in planning policy. The document seems to suggest at Section 4, sub-heading 3 that 'the more land hungry and heavy industry activities' are moved elsewhere. The document does not suggest where, nor does it suggest how aggregates imported into the Safeguarded Wharf area would be transported to these theoretical 'off-site' locations. This is rather ill-conceived idea does not conform with MPSI para 13 or the NPPF para 102 and the safeguarding of existing wharves/rail heads for the manufacture of aggregate related products such as asphalt and ready-mixed concrete.</p> <p>As has recently been shown with the Greenwich Millennium Village Phase 3,4 & 5 planning application, there should be no reason why activities taking place within the Safeguarded Wharf should not be compatible with other surrounding land uses, providing that</p>

ID	Name	Organisation	Comments
			<p>those surrounding uses take into account wharf activities at the design stage.</p> <p>In summary, the SPD cannot be considered as being sound as it does not afford sufficient protection to the Safeguarded Wharves at Angerstein and Murphy's Wharves as per MPS 1, the draft NPPF and other London Plan policies. Furthermore, arbitrary terms such as 'smart wharves' have been introduced, which are somewhat meaningless in the wider planning arena.</p> <p>We trust the above comments will be given due consideration.</p>
17	Mr Simon Hall		<p>The comments in this submission are made in an individual capacity as a resident living in the Charlton Riverside area and a parent of a 2 year old who lives with me for 50% of the time. I am also the Chair of the Charlton Riverside Action Group, and acknowledge that there will be similarity between the submissions as they have been drawn up together. CRAG's submission, however, is a separate one and was drawn up following community discussion and a public meeting of over 80 people. My comments also have benefitted from being present at that meeting.</p> <p>Overall Comments</p> <p>1. The Master Plan makes only limited mention about how Charlton Riverside relates to the rest of Charlton (greater Charlton); it does not seem to view it as part of a single community. For those of us that live in Charlton Riverside (I live on Woolwich Road) we identify as residents of Charlton - although our chief transport links at present are to Greenwich or Woolwich apart from the 486 from Charlton station).</p> <p>2. The Plan's "mixed use" approach seems and feels divisive. The impression created by the Plan's diagrams is that of a series of exclusive zones or blocks for different functions and activities (i e <i>not</i> mixed), especially relative to work place and living place.</p> <p>3. Better definition is required for the river front - mention of it being "animated" is dangerously vague. I think much more thought needs to be given - and consultation undertaken - about the whole river front. There are some important industrial wharves and the area would benefit from new industries utilising the river for transport.</p> <p>4. The treatment of the western end of Charlton Riverside (retail and industrial) requires clearer definition. In a certain sense this is the most challenging part of Charlton Riverside. It is a mish mash at present and really needs something more coherent in terms of</p>

ID	Name	Organisation	Comments
			<p>planning direction in here.</p> <p>5. The main residential quarter proposed does not have its own orientating centre or focus. Nor does it have transport links. How would it identify with the rest of Charlton?</p> <p>6. The Plan uses the (arguably contradictory) terms "Georgian streets" and "garden city" to characterise the proposed residential area. Although attractive in themselves, the terms do not seem to take into account greater Charlton's housing character in general (while "city" seems to contradict "village"). They also appear to contradict the Plan's promise to "[continue] the large number of flatted development in the locality with family accommodation" (p13). You will note, too, that property in this part of Charlton is early Victorian.</p> <p>PROPOSALS</p> <p>The numbering of the paragraphs below relate to the numbering of my reservations earlier in the submission (above).</p> <p>1. Greater Charlton</p> <p>1.1. One place, one community. Charlton is a single strong community with a single, unique, centuries-old heart - Charlton Village. Charlton Riverside should be an essential part of it. Thus everything possible must be done to remove barriers between Charlton Riverside and Charlton Hillside, and create a modern ambiance in the former that echoes the traditional one of the latter. In this connection the Master Plan would benefit from making the railway the southern boundary of Charlton Riverside.</p> <p>1.2 An access-only Woolwich Road West. The Master Plan's proposals to traffic-calm the non-dual Woolwich Road between Anchor and Hope and the A102 flyover do not go far enough: it should be an access-only 20mph street with cycle lanes, wide pavements, landscaping features and convenient, safe crossings for pedestrians, especially at junctions and where a new Charlton station exit at the western end of the down platform has been proposed. The Anchor and Hope junction needs planning to ensure the traffic is taken naturally right and thence into Bugsby's Way.</p> <p>1.2 Reducing the bypass barrier effect, encouraging walking and cycling. To the east of Anchor and Hope Lane, the dual-carriageway Woolwich Road - together with its continuation along Anchor and Hope Lane and Bugsby's Way - is a 20th century</p>

ID	Name	Organisation	Comments
			<p>bypass concept. Everything possible should be done to impose a 21st century interpretation on it by reducing the barrier effect and improving the environment for the pedestrian and cyclist. The approach should apply equally to Anchor and Hope Lane and Bugsby's Way. All of the dual carriageways inside the Master Plan area should be treated as avenues or boulevards, not bypasses, and be developed as far as possible into civic assets.</p> <p>1.3 Linking Village to River. Charlton Village and St Luke's Church - Charlton's heart at the top of the hill overlooking the river - have been linked in a straight line to the river for hundreds of years, and in the last two centuries at least, along Charlton Church Lane and Anchor and Hope Lane, a route that runs north-south almost exactly through the middle of Charlton. This traditional connection should be strengthened practically and visually, especially for pedestrians and cyclists.</p> <p>1.4 Anchor and Hope shared surface space. The Village - at the southern end of the revitalised Village/River route - should be complemented at the river by converting Anchor and Hope Lane (the cul-de-sac north of Bugsby's Way) into a landscaped shared-surface space for farmer's markets, fairs or other activities, integrated with the riverside walk and the Anchor and Hope pub.</p> <p>1.5 Charlton Station: transport hub, focal point. The intersection between the Woolwich Road and Anchor and Hope/Charlton Church Lanes axes marks Charlton's rail/bus transport hub. The intersection and any new development to its north should be designed to create a focal point and an architecturally considered space meaningful to Charlton as a whole that serves to link Charlton Riverside to Charlton Hillside and east Charlton to west.</p> <p>1.6 Charlton Station integrated interchange. The existing interchange - and if necessary, the associated intersection - should allow better integration of and access to rail and bus services, including to a revived GWT link to CrossRail in Woolwich. Vehicular routeing across the intersection should not inconvenience and endanger pedestrians and cyclist movements as it does at present.</p> <p>1.7 Charlton Station redevelopment. Given the massive increase in passenger numbers engendered by up to 5000 homes in Charlton Riverside, the station should be completely redeveloped (with an additional entry/exit at the western end of the down platform into Troughton/Rathmore Roads and Charlton Retail).</p> <p>1.8 Charlton Station: Woolwich Road/Anchor and Hope Lane junction. This should be re-designed to allow traffic from Charlton Church Lane to turn left into a limited-access Woolwich Road west and to move straight ahead into Anchor and Hope Lane. The existing Charlton Church Lane pinch points and bus entry point should be retained, although this could be a source of intersection design challenges. The importance of this junction is critical in a number of ways and, whatever the future of the Master</p>

ID	Name	Organisation	Comments
			<p>Plan, its design should be a major matter of consultation at the earliest opportunity, not least because developments for the Retail Park are evolving rapidly.</p> <p>1.9 A green corridor and link. Charlton's parks are one of its greatest assets and we therefore fully support the widening of Thames/Barrier Park and its integration with Maryon Wilson Park, Maryon Park and the Green Chain. The essential link across the Woolwich Road - whatever the future of the Master Plan - should in the long term be in the form of a "green bridge" but in the shortest possible term should be something much better than the standard pedestrian crossing.</p> <p>2 . The meaning of mixed use</p> <p>2.1 Linking living and working. Planning and design should ensure that a large spectrum of workplace opportunities are built into Charlton Riverside - respecting and building on its heritage of work - from small factory and business to artisanal workshop and creative studio. Also included in this definition of work, is the role of the traditional shop, which mix highly successfully and usefully with the residential. The presence of workplaces as a whole should as far as possible be interwoven with living places as a whole, fostering quick or even immediate access between home and work, and encouraging the creation of work facilities and methods that are regarded as attractive civic assets rather than grotty liabilities. This approach does not reject concentrations of work places and, separately, of living places but, unlike conventional zoning practices, sees the one shading into the other in a spectrum of interacting activities.</p> <p>2.2 Linking living, studying, creating, working. The underpinning of a close association between work place and living place should be applied with equal vigour to the other core activities envisaged for Charlton Riverside, as the Plan seems to suggest it is in the eastern creative quarter, where creative, residential and study facilities are indicated as being located together.</p> <p>3 . Relating to the river</p> <p>3.1 Riverside living, working and playing. River frontage at ground level and first floor levels should be designed to engender activities that ensure that the river front is "brought to life" (which on present evidence the Peninsula, for instance, completely fails to achieve: the O2 shuns one of the finest river frontages in London; the office developments turn their shoulders to the river; and the apartment blocks offer no ground level opportunities to draw in the public - an essential ingredient of any "animation"). Such activities would benefit critically from a focal point such as a local setback in the building line and the availability of space for businesses, including cafes, etc. In this connection we also suggest that the north-south residential building line abutting the Barrier</p>

ID	Name	Organisation	Comments
			<p>should open up towards the river.</p> <p>3.2 Public transport access to the river. A critical element for riverfront success will be a local bus route (such as the highly successful 380 serving Charlton Hillside) running parallel with and as close as possible to the river bank (a bankside bus).</p> <p>3.3 The river "playground". In addition to the additional "animation" inherent in the Plan's proposed marina, flights of steps should make it possible to easily reach sandy/pebble areas of the river bed at low tide (as near the Greenwich Yacht Club).</p> <p>3.3 Piers. Existing fixed piers should be safeguarded while further planning definition takes place (this is an area where the future potential of building new employment from using the river for new industries has not been adequately covered by the Plan).</p> <p>3.4 The river path. For pedestrians and cyclists, and rightly promoted by the Master Plan, the problem of extending it downriver of the Barrier has to take into account the fact that a high river flood wall forms a complete visual barrier between views of and contact with the river.</p> <p>4. Charlton Riverside West</p> <p>4.1 Evolution towards intensification: Charlton Retail Park. <i>Charlton Riverside West presents the biggest challenges to planning and development. A slow, evolutionary approach is inevitable as perceptions and land uses and values change.</i> It is noted with approval that the Master Plan does not exclude the long-term possibility of incorporating residential accommodation in Charlton Riverside West, an approach that conforms to the principle of truly mixed-use development espoused in this document (see paras 2.1 and 2.2).</p> <p>4.2 A strategic shopping park. The fact that the Charlton Retail Park is strategically - and uniquely - located alongside a combination of numerous bus routes; a commuter rail station linked to both Greenwich and Blackheath/Lewisham and key locations eastwards; and London's only north-south, cross-river through traffic artery, calls for the Park's role and benefits in respect of Charlton, Greenwich and the larger region to be carefully teased out and built on (i.e., despite its current bleakness, it should not be dismissed out of hand as a civic liability) while also keeping an eye on frontage development and long-term intensification.</p> <p>4.3 Towards a one-stop retail experience. The immediate starting point should be a comprehensive, professionally conceived plan for sheltered footpaths and for landscaping and plant screening designed above all to benefit the convenience of the pedestrian,</p>

ID	Name	Organisation	Comments
			<p>whether arriving on foot, by public transport or by car; car parking should be designed around this priority. The key aim will be to make walking and lingering between and at shops, stores, cafes and other zones a pleasurable experience. An electric inter-store shuttle bus-train should be considered as part of a mix that recognises that large-area car parking is unavoidable for the foreseeable future. It is noted that a positive start to appraising the potential (partly modelled on American experience) has been made by LXB, the developers currently with an interest in various parts of the Retail Park.</p> <p>4.4 Evolution towards intensification: Charlton Industrial Park. The Angerstein Wharf is protected, while the Sainsbury's distribution warehouse is built on land with a 65-year lease. Evolution in this area will therefore inevitably be very slow. A priority should be to assess how efficiently the Angerstein Wharf land is used and whether the safeguarded area could be reduced and the released land made available for the smart industries cited by the Master Plan.</p> <p>4.5 Charlton Industrial Park: mixed use. If any residential accommodation is considered for this area, it would be justified in the form of taller buildings, both to screen off the Angerstein Wharf and to relate to the generally higher buildings on the Peninsula on the other side of the Wharf.</p> <p>4.6 Charlton Industrial Park: heritage for the future. The Industrial Park is the focus of Charlton's industrial - or work place - role. The proximity of the river suggest types of activity that could continue Charlton's maritime history but whatever takes shape here, it should help to break the British habit of centuries: that the workplace is all too often something to regret and neglect. As implied under para 2.1 and 2.2, work other than that on the truly industrial scale should be regarded as - and designed to be - something that is part of the community. (See Appendix Note 1, below)</p> <p>5. A residential heart</p> <p>The main residential area defined by the Master Plan does not have an identifiable focal point or heart. Given the relative isolation of the proposed riverside community, such a heart is more important than usual and relates implicitly to the avoidance of anything resembling a "housing estate" - i.e. it should be a place worthy of the community that will emerge and live there. In this connection it will be essential to link this community to the local bankside bus service (see 3.2) and might also have visual or other connections with the river, Barrier Park and along the line towards the inland church spire suggested by the Master Plan and/or St Luke's Church tower. Given the proposed housing density, a small clutch of shops would be an essential part of the focal point or heart.</p>

ID	Name	Organisation	Comments
			<p>6. Streets to live in</p> <p>6.1 Small-scale, sustainable, vital, varied. While the principle of a traditional street pattern with terraces and private gardens is a good one, it is important not to exclude other built forms in addition to those indicated in the Master Plan, whether private, public or housing association. While the intimacy of scale typical of greater Charlton is important to emulate, good design can achieve a variety of densities without losing that intimacy: given a general low density and low rise, other densities should be considered in appropriate locations where this would not compromise the generality. Such an approach would be in sharp contrast to development on the Peninsula, where the scale of even the Millennium Village is all too often bulky and oppressive (it could be argued that greater "village intimacy" could have been achieved there if densities and building heights had been more varied). However, while greater Charlton suggests a certain small-scale character, any future housing proposals for Charlton Riverside should not be expected to ape this simply because it may be traditional. The aim should always be to better it and to have learned the painful lessons of modern housing, densities and social mixes of every kind. Whichever format or formats emerges over the years, intimacy, maximal sustainability, green spaces, green landscaping and green pedestrian and cycle routes should inform every one of them.</p> <p>6.2 A precedent too far. "[continue] the large number of flatted development in the locality with family accommodation" (Master Plan - p13). The thrust of this statement is on the face of it a contradiction of the "contemporary Georgian terraced neighbourhood" (Master Plan - p21) type of development espoused in the Master Plan and urgently requires clearer definition and explanation. (The residential property in this part of Charlton tends to be of an early Victorian date rather than Georgian).</p> <p>6.3 Education for all. The area north-east of and immediately adjacent to the Anchor and Hope Lane/Woolwich Road intersection is designated for educational purposes (most significantly for an urgently required senior school for Charlton, and subsequently a new junior school as the current facilities are full). Apart from careful design and positioning to avoid the pollution at the intersection, the integration theme that should permeate the whole of the Charlton Riverside development for the purposes of sustainability and vitality requires that this educational hub should also be conceived of as a creative and community hub incorporating workplace and residential components, a kind of twin of the other creative and community hub on the eastern edge of Charlton Riverside.</p>
18		Co-Operative Insurance Society Ltd	Capita Symonds Ltd acts on behalf of the Co-Operative Insurance Society Ltd (CIS Ltd), freehold owner of the Westminster Industrial Estate.

ID	Name	Organisation	Comments
			<p><u>The Site</u></p> <p>The Westminster Industrial Estate (hereafter referred to as "the estate") is located on the south bank of the River Thames, between the A206 (Woolwich Road) and the river and immediately east of the linear park running from the Thames Barrier to the A206. The estate extends to approximately 9 ha - as shown by the red line on the attached plan. The majority of the 60 units that make up the estate are in light industrial use, with others being used for storage, workshop and office purposes. In the north west corner of the estate there are a number of buildings in fairly poor condition and with nil or very low occupancy.</p> <p>In July 2011 Capita Symonds engaged in pre-application discussions with the London Borough (LB) of Greenwich with a view to bringing the north west corner of the estate forward for part redevelopment and part conversion to mixed uses (including retail, employment and residential). This corner of the estate extends to approximately 3.5 ha and includes Units 28-34, 61-78 and 219.</p> <p>Recognised as part of an "Opportunity and Intensification Area" in the London Plan (2011) and part of a "Strategic Development Location" in the draft Greenwich Core Strategy (2011), the estate is a highly suitable location for new mixed use development.</p> <p><u>The Charlton Riverside SPD</u></p> <p><u>General Comments</u></p> <p>CIS Ltd supports the preparation of a Supplementary Planning Document (SPD) to guide future development in the Charlton Riverside area. By including further planning guidance – to that set out in the London Plan and the draft Core Strategy – on the vision, objectives, development principles, development framework and delivery expectations for the area, the SPD will provide certainty to all stakeholders on how the various parts of Charlton Riverside should come forward for development. Support is offered also to the overall scale of development identified in the SPD, including a new neighbourhood of 3,000-5,000 homes.</p> <p>Accepting that the SPD is in draft format at present, the only general concern expressed is that there appears to be some conflict between the drawings included. In particular, the concept plan on page 14 shows the majority of the estate as one "creative industries / residential / historic quarter", however, the development principles plan on page 16 separates this out into two distinct coloured areas (green and light blue), with no matching references on the key. As a result, it is not entirely clear which parts of the</p>

ID	Name	Organisation	Comments
			<p>estate are being earmarked for the various intended uses. Greater clarity on the final drawings would be helpful.</p> <p><u>Education Hub</u></p> <p>The LB of Greenwich has already purchased Units 220-224 at the estate (see attached plan) in order to progress plans for a new education facility. The principle of identifying a new “education hub”, immediately north of the A206 and east of the existing linear park, is supported.</p> <p>However, CIS Ltd objects to the extent of the area shown which, according to the concept plan on page 14 of the draft SPD, includes Units 146-150 and potentially Units 151 and 209-212. At present the landowner has no intention to release these units to form part of a wider education hub. Indeed Units 146-150 are currently used for light industrial / workshop purposes and have existing tenants in place. The continued use of these units is not expected to impact on the creation of new education hub immediately to the west. With this in mind, the drawings in the SPD ought to be amended to reflect that the new “education hub” will centre on Units 220-224 and Holborn College only.</p> <p><u>Creative Industries / Residential / Historic Quarter</u></p> <p>With regard to the estate, it is noted that page 20 of the draft SPD states that:</p> <p><i>“The historic buildings in this area will provide a rich set of mixed uses and cultural industries, artist’s studios and evening economy uses, which will act as a focus for new high quality residential development, sensitively woven into the historic environment. New buildings will take advantage of river views and be of contemporary designs reflecting the solidity of the brick built traditional warehouses. There will be a perimeter block street pattern with brick (London Stock) as the predominant building material. Schemes such as St Andrews in Bromley by Bow will act as inspiration.”</i></p> <p>These principles accord with the landowners aspirations, as articulated through pre-application discussions in July 2011. In particular, CIS Ltd proposed to:</p> <ul style="list-style-type: none"> - convert and extend the historic buildings at Units 28-34 for a mix of retail, restaurant/cafés, offices, workshops and residential uses;

ID	Name	Organisation	Comments
			<ul style="list-style-type: none"> - convert the historic buildings at Units 61-77 and new build adjacent to Unit 61C for residential uses; - redevelop Unit 219 for residential use; and - demolish Unit 78. <p>As such the landowner supports the development framework identified in the draft SPD, the range of uses suggested and the potential for new residential uses across the whole of this urban “quarter” in the long term. However, the LB of Greenwich should be aware that tenants currently occupy Units 208, 216 and 217 and that their leases prevent redevelopment here in the short to medium term. Therefore, the planned redevelopment of the estate should be allowed on a phased basis, as follows:</p> <ul style="list-style-type: none"> (i) the area to the north west of the estate, comprising Units 28-34, 61-78 and 218-219; (ii) the area to the south of the estate (Units 151 and 206-215), south of Westfield Street and east of the education hub; and finally (iii) the area to the centre and east of the estate (Units 208 and 216-217), north of Westfield Street, as and when they become available. <p>Phasing of this nature will minimise any impact on existing business and maximise the employment generation possible from the estate, until such time that redevelopment occurs. The commentary in Section 6 of the SPD ought to be amended to recognise that the estate (itself referred to as Phase 2) is likely to be redeveloped in a series of sub-phases as set out at (i) to (iii) above.</p> <p><u>Conversion of Buildings</u></p> <p>CIS Ltd recognise that some of the warehouse buildings towards the north west corner of the estate have historic merit and therefore plan to retain and convert these for new mixed uses. Any retention and conversion will take place subject to the building being suitable, structurally sound and viable for the intended use.</p> <p><u>Clipper Terminal and Greenwich Waterfront Transit Route</u></p>

ID	Name	Organisation	Comments
			<p>Section 4 of the SPD refers to a number of public transport initiatives that are transforming the area around Charlton Riverside, including the new Crossrail station at Woolwich and the DLR spur linking to London City Airport on the north side of the river. The successor to the Greenwich Waterfront Transit system and a more local bus service are seen to be important to connect Charlton and the new residential neighbourhoods into these services.</p> <p>CIS Ltd support plans for the successor to the Greenwich Waterfront Transit system, more local bus services and use of the Barrier Gardens Pier by the Thames Clipper. These services will help to enhance the sustainability credentials of Charlton Riverside and will increase the likelihood that journeys will be made by non-car means.</p> <p><u>Conclusion</u></p> <p>In conclusion, CIS Ltd is supportive of the draft Charlton Riverside SPD, subject to the following changes being made prior to approval of a final version by the local authority:</p> <ul style="list-style-type: none"> - the master plan drawings being altered to provide greater clarity and easy to reference keys, setting out which part of the Westminster Industrial Estate is being identified for creative industry-led mixed uses and which part solely for new residential uses; - the master plan drawings being amended to reflect that the new education hub will centre on Units 220-224 and Holborn College only; and - Section 6 being amended to recognise that existing tenancies / lease interests are likely to result in the redevelopment of the Westminster Industrial Estate in a series of sub-phases.
19	Roden Richardson		<p>"Sustainable...mixed-use....green....varied....creative....working....thriving.... connected....high quality...." (some Master Plan adjectives)</p> <p>INTRODUCTION</p> <p>CRAG agrees with the main thrust and key features of the Master Plan and believes that, duly modified in line with our REQUESTS and NOTES and QUALIFICATIONS, they would provide an effective and potentially inspiring framework for the development of the</p>

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			<p>location.</p> <p>Our RESERVATIONS are set out in the numbered list on p3. We also set out the reasoning, related issues and associated conclusions behind those reservations on pages 4-13 under the general heading of requests and of notes and qualifications, in paragraphs numbered with reference to the reservations paragraphs on p3.</p> <p>The points we make are the result of internal discussion within CRAG, illuminated and/or reinforced by the responses of people attending the CRAG open meeting.</p> <p>Reservations and Requests</p> <p>The underlying theme of CRAG's approach to the Master Plan is integration: of Riverside with greater Charlton; of living, working, creating, studying and playing; of river and riverside; and of the built environment with the natural one.</p> <p>Taking the existing Master Plan as our cue, we envisage Charlton Riverside as a place of predominantly intimate, small-scale but generous spaces, comprehensively endowed with green environments and greenery (confirming the overwhelmingly green, low-rise appearance of the existing southern riverside and hinterland as viewed from north of the river) and as a place that sets a new, 21st century definition and standard for a vital, close-knit, sustainable and truly mixed-use community.</p> <p>RESERVATIONS</p> <p>1. The Master Plan makes only limited mention about how Charlton Riverside relates to the rest of Charlton (greater Charlton); it does not seem to view it as part of a single community.</p> <p>2. The Plan's "mixed use" approach seems divisive. The impression created by the Plan's diagrams is that of a series of exclusive zones or blocks for different functions and activities (i e <i>not</i> mixed), especially relative to work place and living place.</p>

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			<p>3. Better definition is required for the river front – mention of it being “animated” is dangerously vague.</p> <p>4. The treatment of the western end of Charlton Riverside (retail and industrial) requires clearer definition. In a certain sense this is the most challenging part of Charlton Riverside.</p> <p>5. The main residential quarter does not have its own orientating centre or focus.</p> <p>6. The Plan uses the (arguably contradictory) terms “Georgian streets” and “garden city” to characterise the proposed residential area. Although attractive in themselves, the terms do not seem to take into account greater Charlton’s housing character in general (while “city” seems to contradict “village”). They also appear to contradict the Plan’s promise to “[continue] the large number of flatted development in the locality with family accommodation ” (p13).</p> <p>REQUESTS</p> <p>The numbering of the paragraphs below relate to the numbering of our reservations on the previous page (p3).</p> <p>1. An integrated Charlton</p> <p>Knit Charlton Riverside into greater Charlton</p> <p>1.1. One place, one community . Charlton is a single strong community with a single, unique, centuries-old heart – Charlton Village. Charlton Riverside is and should remain an essential part of it. Thus everything possible must be done to remove barriers between Charlton Riverside and Charlton Hillside, and create a modern ambience in the former that resonates with the traditional one of the latter. In this connection we think the Master Plan would benefit from making the railway – rather than the Woolwich Road - the southern boundary of Charlton Riverside.</p> <p>1.2 An access-only Woolwich Road West. The Master Plan’s proposals to traffic-calm the non-dual Woolwich Road between Anchor and Hope and the A102 flyover do not go far enough or are sufficiently explicit: it should be an access-only 20mph street with cycle lanes, wide pavements, landscaping features and convenient, safe crossings for pedestrians, especially at junctions and where CRAG proposes a new Charlton station exit at the western end of the down platform. Whatever the progress of the current</p>

ID	Name	Organisation	Comments
			<p>Master Plan, this proposal is urgent in its own right, both to improve the environment and integrate the north and south sides of the Woolwich Road.</p> <p>1.3 Reducing the bypass barrier effect, encouraging walking and cycling . To the east of Anchor and Hope Lane, the dual-carriageway Woolwich Road - together with its continuation along Anchor and Hope Lane and Bugsby's Way - is a hugely divisive 20th century bypass concept. Everything possible should be done to impose a 21st century interpretation on it by reducing the barrier effect and improving the environment for the pedestrian and cyclist. The approach should apply equally to Anchor and Hope Lane and Bugsby's Way. All of the dual carriageways inside the Master Plan area should be treated as avenues or boulevards, not bypasses, and be developed and landscaped as far as possible in terms of their value as civic assets.</p> <p>1.4 Linking Village to River. Charlton Village and St Luke's Church – which, together with Charlton House are Charlton's historic heart at the top of the hill overlooking the river - have been linked in a straight line to the river for hundreds of years, and in the last two centuries at least, along Charlton Church Lane and Anchor and Hope Lane, a route that runs north-south almost exactly through the middle of Charlton. This traditional connection should be strengthened practically and visually, especially for pedestrians and cyclists.</p> <p>1.5 Anchor and Hope shared surface space . The Village - at the southern end of the revitalised Village/River route - should be complemented at the river by converting Anchor and Hope Lane (the cul-de-sac north of Bugsby's Way) into a landscaped shared-surface space for farmer's markets, fairs or other activities, integrated with the riverside walk and the Anchor and Hope pub.</p> <p>1.6 Charlton Station: transport hub, focal point. The intersection between the Woolwich Road and Anchor and Hope/Charlton Church Lanes axes – Charlton's strategic centre - marks Charlton's rail/bus transport hub. The intersection and any new development to its north should be designed to create a focal point and an architecturally considered space meaningful to Charlton as a whole that serves to link Charlton Riverside to Charlton Hillside and east Charlton to west.</p> <p>1.7 Charlton Station integrated interchange. The existing interchange – and if necessary, the associated intersection - should allow better integration of and access to rail and bus services, including to a revived GWT link to CrossRail in Woolwich. Vehicular routeing across the intersection should not inconvenience and endanger pedestrians and cyclist lives and movements as it does at present.</p> <p>1.8 Charlton Station redevelopment . Given the increasing strategic importance of this part of the borough (railway</p>

ID	Name	Organisation	Comments
			<p>connections, not least north-south to Blackheath and Lewisham and east-west to Woolwich CrossRail and London Bridge ThamesLink; a riverside railhead; a unique north-south national cross-river highway artery traversing the capital; and a unique riverside centre for business and light and creative industry) as well as the massive increase in passenger numbers that would be engendered by up to 5000 homes in Charlton Riverside, the station should be completely redeveloped (with an additional entry/exit at the western end of the down platform directly into Troughton/Rathmore Roads and thence to Charlton Retail and Industrial Parks).</p> <p>1.9 Charlton Station: Woolwich Road/Anchor and Hope Lane junction . This should be re-designed to allow traffic from Charlton Church Lane both to turn left into a limited-access Woolwich Road west <i>and</i> to move straight ahead into Anchor and Hope Lane. The existing Charlton Church Lane pinch points and bus entry point should be retained. The importance of this junction is critical in a number of ways and, whatever the future of the Master Plan, its design should be a major matter of consultation at the earliest opportunity, not least because developments for the Charlton Retail Park are evolving rapidly.</p> <p>1.10 A green corridor and link . Charlton's parks are one of its greatest assets and we therefore fully support the widening of Thames/Barrier Park and its integration with Maryon Wilson Park, Maryon Park and the Green Chain. The essential link across the Woolwich Road – whatever the future of the Master Plan - should in the long term be in the form of a “green bridge” (similar to the one at Mile End) but in the shortest possible term should be something much better than the standard pedestrian crossing.</p> <p>2 . The meaning of mixed use</p> <p>Making more of mixed use</p> <p>2.1 Linking living and working . Planning and design should ensure that a large spectrum of workplace opportunities are built into Charlton Riverside – respecting and building on its heritage of work - from small factory and office to artisanal workshop and creative studio. Also very much part of this definition of work is the role of the traditional shop, an ideal accompaniment in a walkable world to the residential. The presence of workplaces as a whole should as far as possible therefore be interwoven with living places as a whole, fostering quick or even immediate access between home and work, and encouraging the creation of work facilities and methods that are regarded as attractive civic assets rather than grotty liabilities. This approach does not reject concentrations of work places and, separately, of living places but, unlike conventional zoning practices, sees the one shading into the other in a spectrum of interacting activities (today's Hoxton is a case in point).</p>

ID	Name	Organisation	Comments
			<p>2.2 Linking living, studying, creating, working . The underpinning of a close association between work place and living place should be applied with equal vigour to the other core activities envisaged for Charlton Riverside, as the Plan seems to suggest it is in the eastern creative quarter, where creative, residential and study facilities are indicated as being located together.</p> <p>3 . Relating to the river</p> <p>Setting a new, better precedent for living, working and playing by the river</p> <p>3.1 Bringing the riverside to life. River frontage at ground level and first floor levels should be designed to engender activities that ensure that the river front is “brought to life” (which on present evidence the Peninsula, for instance, completely fails to achieve: the O2 shuns one of the finest river frontages in London; the office developments turn their shoulders to the river; and the apartment blocks offer no ground level opportunities to draw in the public – an essential ingredient of any “animation”). Such activities would benefit critically from a focal point such as a local setback in the building line and the availability of space for businesses, including cafes, etc. In this connection we also suggest that the north-south residential building line abutting the Barrier should open up towards the river.</p> <p>3.2 Public transport access to the river . A critical element for riverfront success will be a local bus route (such as the highly successful 380 serving Charlton Hillside) running in zig-zag fashion parallel with and as close as possible to the river bank (a bankside bus).</p> <p>3.3 The river playground . In addition to the additional “animation” inherent in the Plan’s proposed marina, flights of steps should make it possible to easily reach sandy/pebble areas of the river bed revealed at low tide (as near the Greenwich Yacht Club).</p> <p>3.4 Piers. Existing fixed piers should be safeguarded while further planning definition takes place.</p> <p>3.5 The river path. For pedestrians and cyclists, and rightly promoted by the Master Plan, the green river path should cut out the existing detour at the Barrier and take into account the fact that a high river flood wall forms a complete visual barrier between views of and contact with the river.</p> <p>3.6 The Barrier tunnel. The possible use of this existing service tunnel for public pedestrian use when the Barrier is</p>

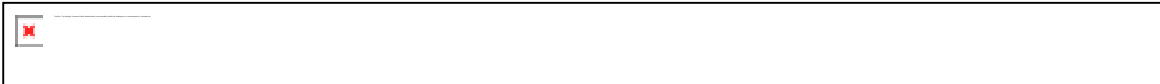
ID	Name	Organisation	Comments
			<p>decommissioned should be borne in mind.</p> <p>4. Charlton Riverside West</p> <p>Bringing life to Charlton Retail Park</p> <p>4.1 Evolution towards intensification: Charlton Retail Park. <i>Charlton Riverside West presents the biggest challenges to planning, design and development. While a slow, evolutionary approach is inevitable as perceptions and land uses and values change, there is also a major opportunity for immediate action.</i> It is noted with approval that the Master Plan does not exclude the long-term possibility of incorporating residential accommodation in Charlton Riverside West, an approach that conforms to the principle of truly mixed-use development espoused in this document (see paras 2.1 and 2.2).</p> <p>4.2 A strategic shopping park . The fact that the Charlton Retail Park is strategically – and uniquely – located alongside a combination of numerous bus routes; a commuter rail station linked exceptionally to both Greenwich and Blackheath/Lewisham as well as key locations eastwards and westwards; and London’s only north-south, cross-river through-traffic artery, calls for the Park’s role and benefits in respect of Charlton, Greenwich and the larger region to be carefully teased out and built on. Although seen by many as a liability - and even leaving aside the immediately self-evident benefits of frontage development and eventual intensification - it presents obvious and not so obvious opportunities in both the short and the long term for improvement, enlivening and optimisation that should be carefully explored in terms of 21st century trends.</p> <p>4.3 Towards a one-stop retail experience. An opportunity for immediate action would be a comprehensive, professionally conceived plan for sheltered footpaths and for landscaping and plant screening designed above all to benefit the convenience of the pedestrian, whether arriving on foot, by public transport or by car; car parking should be designed around this priority. The key aim will be to make walking and lingering between and at shops, stores, cafes and other zones a pleasurable experience. An electric inter-store shuttle bus-train should be considered as part of a mix that recognises that large-area car parking is unavoidable for the foreseeable future. It is noted that a positive start to appraising the potential (partly modelled on American experience) has been made by LXB, the developers currently with an interest in various parts of the Retail Park.</p> <p>4.4 Evolution towards intensification: Charlton Industrial Park. The Angerstein Wharf is protected, while the Sainsbury’s distribution warehouse is built on land with a 65-year lease. Evolution in this area will therefore inevitably be particularly slow. A priority should be to assess how efficiently the Angerstein Wharf land is used and whether the safeguarded area could be reduced</p>

ID	Name	Organisation	Comments
			<p>and the released land made available for more of the smart industries cited by the Master Plan.</p> <p>4.5 Charlton Industrial Park: mixed use. If, as the Master Plan suggests it should be, any residential accommodation is considered for this area, it would be justified in the form of taller buildings, both to screen off the Angerstein Wharf and to relate to the generally higher Peninsula buildings on the other side of the Wharf.</p> <p>4.6 Charlton Industrial Park: heritage for the future . The Industrial Park is the focus of Charlton's industrial - or work place - role. The proximity of the river suggest types of activity that could continue Charlton's maritime history but whatever takes shape here, it should help to break the British habit of centuries: that the workplace is all too often something to regret, neglect and avert the gaze from. As implied under para 2.1 and 2.2, work other than that on the truly industrial scale should be regarded as – and designed to be - something that is part of the community. (See Appendix Note 1, below)</p> <p>5. A residential heart</p> <p>A community the size of Charlton Riverside should have a local centre of its own</p> <p>5.1 The main residential area defined by the Master Plan does not have an identifiable focal point . Given the relative isolation of the proposed riverside community, such a place is more important than usual and relates implicitly to the avoidance of anything resembling a “housing estate” – i e it should be a local magnetic centre worthy of the community that will emerge and live there. In this connection it will be essential to link this community to the local bankside bus service (see 3.2) and might also have visual or other connections with the river, Barrier Park and along the line towards the inland church spire suggested by the Master Plan and/or St Luke's Church tower. Given the proposed housing density, a small clutch of shops would be an essential part of this local centre.</p> <p>6. Streets to live in</p> <p>Learning the lessons of the past and bringing street space into the 21st century</p> <p>6.1 Small-scale, sustainable, vital, varied. While the principle of a traditional street pattern with terraces and private gardens is a good one, it is important not to exclude other built forms in addition to those indicated in the Master Plan, whether private, public</p>

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			<p>or housing association. While the intimacy of scale typical of greater Charlton is important to emulate, good design can achieve a variety of densities without losing that intimacy: given a general low density and low rise, other densities should be considered in appropriate locations where this would not compromise the generality. Such an approach would be in sharp contrast to development on the Peninsula, where the scale of even the Millennium Village is all too often bulky and oppressive (it could be argued that greater “village intimacy” could have been achieved there if densities and building heights had been more varied rather so evenly distributed). While greater Charlton suggests a certain small-scale character, any future housing proposals for Charlton Riverside should not be expected to ape this simply because it may be traditional. The aim should always be to better it and to have learned the painful lessons of modern housing, densities and social mixes of every kind. Whichever format or formats emerges over the years, intimacy, maximal sustainability, green spaces, green landscaping and green pedestrian and cycle routes should inform every one of them.</p> <p>6.2 A precedent too far. “[continue] the large number of flatted development in the locality with family accommodation ” (Master Plan - p13). The thrust of this statement is on the face of it a contradiction of the Plan’s stated “contemporary Georgian terraced neighbourhood” (Master Plan - p21) type of development and urgently requires clearer definition and explanation, arguably in the light of para 6.1, above.</p> <p>6.3 Education for all . The area north-east of and immediately adjacent to the Anchor and Hope Lane/Woolwich Road intersection is designated for educational purposes (most significantly for an urgently required senior school for Charlton). Apart from careful design and positioning to avoid the pollution at the intersection, the integration theme that should permeate the whole of the Charlton Riverside development for the purposes of sustainability and vitality requires that this educational hub should also be conceived of as a creative and community hub incorporating workplace and residential components, a kind of twin of the other creative and community hub on the eastern edge of Charlton Riverside.</p> <p>NOTES and QUALIFICATIONS</p> <p>NI. “ Village ”: We are aware of the dangers in the use of this term. “Charlton Village” effectively refers to a 100-metre stretch of roadway and shops and perhaps the houses (not the blocks of flats) within a stone’s throw. Compare this with the population of Charlton as a whole today: this approaches 20,000, qualifying it for small town status. Add in Riverside’s new population and that figure increases to at least 30,000. Millennium “Village” on the Peninsula consists of blocks of flats trying to masquerade as a village – most of the blocks are higher than anything residential in central London. The Olympic “Village” consists of 7- or 8-storey blocks interspersed with green squares. In this case the term “village” is simply a convenient way of identifying a relatively compact set of</p>

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			<p>rather large buildings. Our use of the term, on the other hand, is to suggest intimacy, harmonious proportions, small scale, low rise, sustainability and variedness – i.e. buildings that relate to rather than dominate the individual, whose height measurement is determined by the needs of the average two- or three-storey family home. Achieving that intimacy in a modern form for Charlton Riverside will be the responsibility of highly imaginative developers and architects ready to break the design mould of the post-war decades.</p> <p>N2. Leisure destination . We note that Charlton Riverside marks the end of the Thames Path as well as the intersection of two major national cycleways. These features should be taken into account in designing the waterfront in addition to those already mentioned in our requests list.</p> <p>N3. Ship to shore. It has been reported that the PLA, amongst others, is critical of any reduction in Thames shoreline industrial land and shoreline industry. Since the Charlton Riverside Master Plan radically alters the area in favour of residential development, and even though it retains the safeguarded wharves and the unique railhead, this seems to be a strategic issue that needs further consideration before the Master Plan can be finalised let alone accepted. The concern is reinforced by the fact that the GLA's LDA/Design for London review of Charlton Riverside appears to seek a balance more in favour of industry.</p> <p>N4. Delivery 1. It is noted that land assembly (and possible soil pollution) are major obstacles to delivery. It is not in the competence of CRAG to comment on this critical issue.</p> <p>N5. Delivery 2. It is noted that the early insertion of the required infrastructure is likely to be critical to enabling delivery. It is not clear how this is to be achieved, given financial and other constraints.</p> <p>N6. Relocation. It is noted that there has been insufficient contact by the Council with existing businesses in connection with the Master Plan consultation and that fears have been expressed by some for their future and their businesses.</p> <p>N7. Employment. It is noted that there have been expressions of great concern about the retention of employment in Charlton, and that this should be given careful consideration in any delivery plan. In this connection we record the comment that a so-called "landscape-led" planning process is insufficient; it should at the same time also be economy- and society-led.</p> <p>N8. Railhead . It is worth noting that it is conceivable that more use might be made of the line that traverses Angerstein Wharf to the river, most ambitiously by extending it through to North Greenwich and from there to Custom House on the other side of the</p>

ID	Name	Organisation	Comments
			<p>river. The latter use – though with different routeing – was suggested many years ago in connection with the creation of an orbital railway for London.</p> <p>N9. Traffic. It is noted that no research has been carried out of the impact of the plan and any changes already in the pipeline on traffic and road capacity, locally and beyond.</p> <p>N10. Developer appeal. It is noted that it has been commented that a Master Plan might create a straitjacket that would repel potential – and all-important – developers and thus defeat the purposes of the Plan.</p> <p>N11. Signage. Whatever the progress of the proposed Master Plan, it is proposed that an immediate start should be made on improving signage in the Riverside and related Hillside areas.</p> <p>N12. Urgent matters. Whatever the progress of the proposed Master Plan, a number of elements should be implemented regardless and at the earliest opportunity. These include the declassifying and calming of the Woolwich Road between the A102 and Anchor and Hope Lane; the redesign of the junction at Woolwich Road and Anchor and Hope Lane/Charlton Church Lane; the upgrading of Charlton Station bus interchange (linked to the junction redesign); the creation of a down-platform western exit for the station, ideally linked by a footbridge to the up-platform; the creation of a landscaped shared-surface space at the northern end of Anchor and Hope Lane, adjacent to the river, together with pedestrian and cycle linkages that reinforce the village/riverside route; the space-making and landscaping for a pedestrian- and cycle-friendly environment in Charlton Retail Park; the design and delivery of a green link across the Woolwich Road between Maryon Wilson Park and Thames/Barrier Park; upgrading of the Woolwich Road/Anchor and Hope Lane/Bugsby's Way dual carriageways to boulevard status complete with multiple pedestrian- and cycle-friendly north-south crossing points; the planning and design for extending the green Thames path for pedestrians and cyclists downstream of the Barrier and removing the existing detour; and research into the availability of any land surplus to requirements at Angerstein Wharf.</p> <p>N13. Section 106 Agreement . In view of the large-scale impact on the immediate locality of development of Charlton Riverside, the application of Section 106 Agreements should favour that locality.</p> <p>N14. Consultation . It is of the greatest importance that the highest possible level of consultation with the public is maintained at all times as the Charlton Riverside project unfolds.</p>

ID	Name	Organisation	Comments
21	Pace Trustees Ltd	Pace Trustees Ltd	<p>Lasalle Investment Managers and Curtis Real Estate represent the interests of Pace Trustees Ltd (the Pension Fund of Co-Op) and write to submit representations to the Charlton Riverside Masterplan on their behalf.</p> <p>Whilst we appreciate the broad intentions of the Masterplan and level of work that has gone into its preparation, we have a number of in-principle concerns with the proposals for the Charlton Riverside area, which are identified in further detail below.</p> <p>BACKGROUND</p> <p>Pace Trustees Ltd owns a site that forms part of the Ashleigh Commerce Estate, located off Westmoor Road. This is identified on the attached plan. The site is currently occupied by a number of obsolete buildings nearing the end of their useful design life, which are currently in use for storage and material processing.</p>  <p>The site forms part of the Ashleigh Commerce Estate and the surrounding area contains a number of industrial and distribution businesses, including Sainsbury's, Selca, Safestore and Next. The Ashleigh Commerce Estate is currently in active use for a range of employment types, including various forms of industrial and distribution uses. It is part of the wider North Charlton Employment Area Strategic Industrial Location.</p> <p>A request for a screening opinion relating to the proposed redevelopment of the site was submitted to the Council in early October 2011. The Council adopted a formal screening opinion on 27 October 2011 confirming that the proposals, comprising the redevelopment of the existing site for the demolition of the existing buildings and erection of an industrial and distribution park (within Classes B1, B2, B8), access arrangements, landscaping, car parking and servicing areas in accordance with the current site allocation in the 2006 Adopted Plan, did not require Environmental Impact Assessment.</p> <p>Since receiving the formal screening opinion, Curtis Real Estate has engaged the services of a full technical consultant team to prepare the necessary reports and assessments to accompany a detailed planning application for the proposals. The application has been prepared and is yet to be submitted.</p> <p>It is against this backdrop that the representations have been prepared.</p>

ID	Name	Organisation	Comments
			<p>MASTERPLAN</p> <p>The Masterplan sets out the vision for the Charlton Riverside area, which identifies the proposal to transform the area into a new urban quarter by 2027. As such, it sets a medium to long term delivery timeframe of 15 years hence.</p> <p>It confirms the intention to facilitate "a significant change in the land uses of the eastern part of the study area, from predominantly employment to residential" with other changes in the land uses across the wider area. The Ashleigh Commerce Estate is located within the area that the Masterplan identifies for redevelopment to provide the Charlton Garden City character area.</p> <p>It acknowledges that delivery of the Masterplan proposals "will require public sector investment and interventions". It also confirms that the attraction of developer interest, particularly for residential development, will be key to the delivery of the Masterplan proposals.</p> <p>It also identifies a number of other matters that will affect the delivery of the Masterplan proposals, including:</p> <ul style="list-style-type: none"> • Contaminated land remediation costs; • Site and land assembly; and <p>The need to deliver the education hub in an early phase.</p> <p>The Ashleigh Commerce Estate situated within an area identified within the Masterplan for redevelopment for residential use.</p> <p>ANALYSIS</p> <p>As confirmed above, the broad intentions of the Masterplan, to the extent that they relate to the improvement of the Charlton Riverside area, are appreciated. However, in the absence of any meaningful implementation and /or land assembly plan other than a brief suggestion that over 15 years sufficient leases may fall in to prompt redevelopment, the residential proposals which affect our site will serve only to create uncertainty and blight. It is not feasible that our site could be redeveloped for residential purposes, on a sound commercial basis, whilst other surrounding sites remain unimproved. In the current economic climate we see no prospect of meaningful public sector investment or intervention to promote the comprehensive regeneration of the plan area,</p>

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			<p>CONCLUSIONS</p> <p>Whilst the broad intentions of the Masterplan are appreciated, we believe that we can positively add to the economic wellbeing of the area in the very near future by redeveloping the site for employment purposes. On behalf of Pace Trustees Ltd, we formally object to the designation of our site for residential use. It is our intention to submit a planning application in the very near future to redevelop the site for industrial and distribution purposes, in a manner that does not prejudice the Masterplan ambitions elsewhere, and aids the economic regeneration of the area.</p>
22	Mr Edward Hill	Transition Greenwich	<p>I object to this Masterplan: It will destroy many local jobs It will create few local jobs It will only be of benefit to well-off people who commute to work, not existing local people It does not build on existing local skills It will create unbearable pressures on existing infrastructure of roads, schools etc</p>
23	Ms Judith Cooke	Planning Liaison Officer Environment Agency	<p>Thank you for consulting the Environment Agency on the above Supplementary Planning Document. This is an area of the Thames Gateway we are keen to be involved in. We attended the public consultation meeting on 20 February 2012.</p> <p>We have reviewed the Charlton Riverside Masterplan Draft Report and agree the area would benefit from regeneration. We support your vision for the Charlton riverside as an attractive public space, the creation of an enhanced Thames Barrier park and a 'walkable' neighbourhood.</p> <p>The key issues and opportunities for the Environment Agency in this location are as follows:</p> <ul style="list-style-type: none"> § development of the area close to the Thames Barrier; § Thames riverside and improvement of flood defences; § flood risk management; § ecological enhancement of the waterfront; § sustainable drainage;

ID	Name	Organisation	Comments
			<p>§ remediation of contaminated land;</p> <p>§ improvement of walking/cycling links;</p> <p>§ provision of green open space.</p> <p>We have set out our detailed comments and provided further sources of information in the following sections appended to this letter:</p> <p>Section 1 – Detailed comments</p> <p>Section 2 – Sources of information</p> <p>We hope our response is constructive and clear. Please contact me if you have any questions or if you would like a meeting to discuss our response or any other issues.</p> <p>Yours sincerely</p> <p>Miss Judith Cooke</p> <p>Planning Liaison Officer</p> <p>Direct dial 020 7091 4002</p> <p>Direct fax 020 7091 4090</p> <p>Direct e-mail judith.cooke@environment-agency.gov.uk</p>

ID	Name	Organisation	Comments
			<p>Section I – Detailed comments</p> <p>Area close to the Thames Barrier</p> <p>There is no doubt that the area around the Thames Barrier (south bank) is ready for regeneration. Our recent dealings with developers next to our north bank lands has provided experience of how we can work with and shape developments on our land borders.</p> <p>The development of a passenger pier at the location downstream of the Barrier is appealing, as it is not so close as to impact our operations or security but could provide a beneficial transport link to which we currently do not have access.</p> <p>We are supportive of the plan subject to being able to influence detail to protect our operational and security requirements.</p> <p>We would have potential concerns as to security with respect to footfall/vehicle movements. There is need to ensure adequate operational access and we will work with developers in coming up with something suitable. There would be other operational considerations such as our storage facilities that we currently use. This is an issue of concern which would be resolved working closely with the developers.</p> <p>Thames riverside and improvement of flood defences</p> <p>Charlton Riverside is shown on the Environment Agency Flood Map as being located in Flood Zone 3a (high risk), within an area benefiting from the Thames Tidal flood defences. A small part in the north western corner is in Flood Zones 1 and 2. Assuming a breach in the defences (in combination with a 1 in 200 and 1 in 1000 year flood event), the area lies within an area at risk of residual flooding. Given the proximity to the River Thames any breach in the defences would result in rapid inundation of the area and the surrounding.</p> <p>We would welcome a greater emphasis on space between the Thames and built development for:</p>

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			<ul style="list-style-type: none"> ▪ a wider public open space / the Thames Path; ▪ opportunities to set back the flood defences; ▪ better operational access to the flood defences, and ▪ raising the defences in line with TE2100 / climate change. <p>There may be opportunities to soften the visual and access impacts of the tidal defences including the proposed crest height raising to address climate change through the design of landscaping works. These issues can be difficult on some individual sites and better addressed on a wider scale.</p> <p>New development adjacent to the River Thames should address the above points and seek to reduce the vulnerability of the defences. Where defences require repair or upgrading this should form part of any riparian development.</p> <p>We are currently developing our TE2100 work to create a riverside strategy for the tidal Thames appraising the environmental constraints and opportunities within each Policy Unit. TE2100 Local Issues and Choices P111 advise that:</p> <p><i>"We are recommending a policy P5 for this policy unit so a higher standard of protection is justified. This will be provided by the Thames Barrier for tidal flood risk upriver of the Thames Barrier. Downriver of the Barrier, policy P5 will be introduced by increasing the amount of defence raising in 2070. Prior to 2070, defences will be raised to keep pace with climate change. The first of these raisings is likely to be around 2040."</i> For more detail please visit: http://www.environment-agency.gov.uk/static/documents/Leisure/TE2100_Chapter09-zone3_east_London.pdf</p> <p>The Local Issues section also presents a hook for improving the riverside: Erosion of the river bed is occurring downriver of the Thames Barrier. It may be necessary to set the defence line back when the defences are upgraded to avoid erosion to the defences. Specifically, the frontage that is coloured green on page 14 is perhaps the best opportunity to incorporate an improved river edge within the new open space. Developers should consider an improved river edge within the open space alongside land raise of the residential development.</p> <p>TE2100 contains a programme of flood management measures for the Thames Estuary which includes:</p> <ul style="list-style-type: none"> • our vision for tidal flood risk management for London and the Thames Estuary which seeks to optimise sustainable solutions with multifunctional benefits;

ID	Name	Organisation	Comments
			<ul style="list-style-type: none"> • an action plan and investment programme of strategic flood management options covering the short, medium and long term; • a clear explanation of how the Plan is adaptable to the uncertainty of a changing future environment – including the changing climate and varying socio-economic scenarios that may develop over the next 100 years. <p>We would welcome the opportunity to work with you to integrate best practice ideas for realising flood risk management solutions and ecological enhancements through new development.</p> <p>We would like to work in partnership with your Authority, third party developers and riparian land owners to improve condition of flood defences when sites come forward for development.</p> <p>Flood risk management</p> <p>The Masterplan should be informed by the Greenwich Strategic Flood Risk Assessment (SFRA) and the Thames Estuary 2100 (TE2100) study carried out by the Environment Agency in 2009 in order to make informed decisions regarding the flood risk.</p> <p>The layout of uses shows residential (classified as ‘more vulnerable’ in flood risk terms) use to the south and south west of the Thames Barrier. This area is shown on the Greenwich SFRA as being at highest risk of flooding. Flooding from all sources should be considered based on the conclusions of the Greenwich SFRA and the future Surface Water Management Plan (SWMP). We would therefore ask that you consider taking a sequential approach by locating more vulnerable uses in areas at least risk of flooding, in line with Planning Policy Statement 25 (PPS25). The Masterplan should identify specific opportunities for flood risk management measures in accordance with London Plan Policy 5.12.</p> <p>Considering the geography of the Charlton area there may be strategic options for some land raising that would help to reduce flood risk and to rationalise layouts taking the sequential approach into account. Building design should also be informed by flood risk.</p> <p>Though design solution may help reduce flood risk, it should be noted that any increase in housing leads to an increase in impermeable areas, which must be considered. An increase in residents in flood risk areas will require increased emergency service assistance during cases of flooding, and will increase risk of flooding to property. This is particularly a risk for the high-density</p>

ID	Name	Organisation	Comments
			<p>options.</p> <p>While appraising the Charlton Master plan, it should be noted that it is not within the normal remit of the Environment Agency to comment on or approve the adequacy of flood emergency and evacuation procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during an emergency will be limited to delivering flood warnings to occupants/users. Planning Policy Statement 25 (Paragraph G12) and its associated Practice Guide (Paragraphs 7.25 to 7.33) best describe the roles and responsibilities for flood warning and evacuation.</p> <p>Ecological enhancement of the waterfront</p> <p>The proposals include a number of elements within the river which will require detailed assessment and input from us. This stretch of the river supports mudflats, a UK priority BAP habitat, and is an important habitat for overwintering birds in this stretch of the Thames.</p> <p>Therefore, proposals that encroach into the Thames should consider these issues and should avoid encroachment for uses that are non-river dependent. It would be useful to caveat these elements of the Masterplan as needing to be subject to full ecological and hydrological assessments, and potentially requiring suitable mitigation and compensation measures based on those assessments.</p> <p>It would be advisable to add onto the Masterplan Maps a polygon representing an improved river edge/enhance river edge. The Map on P14 indicates <i>animate the riverside</i>. This could be rephrased for example <i>improved biodiversity</i> for our benefit.</p> <p>Sustainable drainage</p> <p>It is important that SUDS are considered on a master planning scale if better opportunities are not to be missed. For example, new strategic surface water sewers to the Thames may be needed to drain the inland sites. Green roofs should be used for their biodiversity benefits and to reduce the volume of water that will be discharged to the combined sewers saving on CO2.</p> <p>The Flood and Water Management Act 2010 will introduce far-reaching requirements for SUDS on future construction work. When the commencement order takes effect, applicable construction works will not start until drainage systems have been approved by 'Approving Bodies' in line with national standards for SUDS. The existing right to connect surface water drainage systems to public</p>

ID	Name	Organisation	Comments
			<p>sewers (under Section 106 of the 1991 Water Industry Act) will be restricted to those approved under the new regime, i.e. appropriate SUDS.</p> <p>Approving Bodies (the local planning authorities) will be obliged to adopt all approved drainage systems except those on single properties and public highways. Road drainage will be adopted by Highways Authorities, as now, but design, construction and maintenance must be in line with the new national standards. This will therefore impact on how development in the town will be implemented.</p> <p>The Act applies to any construction work that creates a building or other structure, including “anything that covers land (such as a patio or other surface)”, that will affect the ability of land to absorb rainwater. In other words all new buildings, roads and other paving, whatever the size, type or scale of the project, will be affected – as well as alterations that have drainage implications</p> <p>The Flood and Water Management Act 2010 requires that all new sewers/lateral drains are adopted by the Water Companies. Existing private drains and sewers were adopted from 1 Oct 2011. Developments with new sewers are now required to enter into an adoption agreement under the Water Industry Act 1991.</p> <p>Developers are expected to produce detailed drawings, manhole schedules and sections together with drainage calculations to the Unified Build Standard issued by DEFRA. This standard is expected to be incorporated into the forthcoming Sewers for Adoption 7th Edition which will also cover pumping stations.</p> <p>Sewers should include adequate clearance from adjacent buildings to allow for future access for maintenance and structural integrity of the sewer. Careful routing of the drainage network would minimise the requirements for Easements and Building-Over agreements.</p> <p>Contaminated land</p> <p>Charlton is an area having a significant industrial history. Therefore there is need to adequately reflect the economic opportunities and potential constraints associated with strategically assessing and treating brownfield land. A Global Remediation Strategy (GRS) could be developed for the area to help strategically assess the potential risks associated with redeveloping previously developed brownfield land.</p>

ID	Name	Organisation	Comments
			<p>There is also an improved Code of Practice to regulate the reuse of excavated materials. This Code will facilitate easier cleaning up and re use of excavated materials in soil treatment centres or soil hospitals, which can economically serve a number of small development sites in an area and reduce the need and cost of sending off site to landfill or treatment. We are promoting the consideration of potential hub and cluster sites in other Opportunity Areas. Please refer to the link below - <i>Development Industry Code of Practice - Definition of Waste</i></p> <p>http://www.claire.co.uk/index.php?option=com_phocadownload&view=file&id=212:initiatives&Itemid=82</p> <p>We are encouraged to see that Chapter 6 of the Masterplan document has considered contamination remediation costs as an economic constraint to development in this area. We would recommend that the document outlines how new development may seek to address this issue.</p> <p>Whilst cost is a factor, contamination places other constraints on development. For instance it places restrictions on where certain sensitive land uses such as housing can be located, unless extensive remediation work is carried out. We know that there is minimal geological cover over the principal aquifer in the area (Upper Chalk), and so there may be existing problems of groundwater contamination.</p> <p>Further, drainage schemes for new development must be informed by contamination assessments in order to prevent pollution of groundwater by discharges of surface water through land affected by contamination. We frequently see schemes included in planning submissions where a developer has followed a standard strategy of using infiltration based on general sustainable drainage techniques (SUDS) guidance without detailed consideration of site investigation data.</p> <p>For sustainable redevelopment to be achieved in this highly industrialised area there has to be a clear commitment from the Environment Agency, Royal Borough of Greenwich, landowners and developers alike to work together to address issues of historic contamination.</p> <p>Open Space</p> <p>We are pleased to note that Maryon Park will be enlarged to create a green link to the waterfront. We fully agree that this is essential to creating an attractive living environment and to open up access to the river. This is also in line with the Core Strategy requirement for developments along the riverside to ensure that they incorporate the provision for a riverside walkway.</p>

ID	Name	Organisation	Comments
			<p>We see development as an opportunity for the green spaces to become a major educational and community resource. Providing new and attractive green grid style development, improving entrance ways and knowledge of parks, enhancing and possible extension of the existing green spaces, would be welcome development.</p> <p>We would recommend increased environmental recreation in and around river corridors e.g. increased access to fishing and environmental education. A more informal / softer landscape that connects to the water edge would add a quality of life value for visitor enjoyment and could be an environmental and economic benefit to new development in the area.</p> <p>The Environment Agency would be keen to be involved in enhancements to the green spaces. We can provide examples of enhanced previously “concrete edge” urban lakes and park areas to use as good practice.</p> <div style="border: 1px solid black; padding: 10px; margin-top: 20px;"> <p>Section 2 – Sources of information</p> </div> <p>We collect key evidence for information and influencing plans. This information covers a wide range of environmental issues and opportunities and can be used to influence the policies and implementation of local plans.</p> <div style="border: 1px solid black; padding: 10px; margin-top: 20px;"> <p>Thames Catchment Flood Management Plan & TE2100 Plan</p> <p>Provides an overview of the flood risk in the Thames catchment and sets out our preferred plan for sustainable flood risk management over the next 50 to 100 years.</p> </div>

ID	Name	Organisation	Comments
			http://publications.environment-agency.gov.uk/pdf/GETH1209BOYL-e-e.pdf http://www.environment-agency.gov.uk/homeandleisure/floods/125045.aspx
			Sustainable construction http://www.environment-agency.gov.uk/business/sectors/136252.aspx
			Environment Agency State of Environment Report for Greenwich Highlights environmental facts and data for Greenwich (November 2011) http://www.environment-agency.gov.uk/static/documents/Research/Greenwich_2011.pdf
			Environment Agency Adapting to Climate Change strategy http://publications.environment-agency.gov.uk/pdf/GEHO0709BQBW-e-e.pdf
			Environment Agency – Creating a better place Strategy http://publications.environment-agency.gov.uk/pdf/GEHO1109BOXG-e-e.pdf

ID	Name	Organisation	Comments		
			<p>Other useful strategies</p> <div> <p>Drain London Project</p> <p>Drain London will aim to manage and reduce surface water flood risk in London by improving knowledge of the surface water drainage system and identifying areas at greatest risk of flooding.</p> <p>http://www.london.gov.uk/drain-london</p> </div>		
24	Berkeley Homes	Senior Planner Berkeley Homes (Urban Developments) Ltd	Subject / Site / Page: Vision for Charlton (page 11)	Topic: “By 2027, Charlton Riverside will be transformed into a new urban quarter connecting Greenwich Peninsula to Woolwich town centre. It will comprise of a sustainable mix of uses including substantial residential use in a high quality environment focussed around an enhanced Thames Barrier Park.”	Berkeley Homes Comments: Berkeley Homes supports the Council’s vision for Charlton Riverside, particularly the aspiration to link Charlton to Woolwich town centre and Greenwich Peninsula, along with need to deliver substantial residential development.
			Objectives (page 13)	Strategic Objectives:	

ID	Name	Organisation	Comments
			<p>“Create the ‘missing’ piece of the jigsaw, connecting Greenwich Peninsula to Woolwich town centre”</p> <p>“Contribute towards the development of the Thames Gateway as a great place to invest, live and work”</p> <p>“Create a thriving new neighbourhood set within its landscape”</p> <p>Detailed Objectives:</p> <p>“New well designed and fit for purpose homes for existing residents in the locality”</p> <p>“Diversification of the housing market, in both the private and public sectors by continuing the large</p>

Berkeley Homes supports the strategic objectives for Charlton Riverside, particularly the aspiration to better link the area to Woolwich town centre and Greenwich Peninsula, along with the aspirations to deliver a great place to live and create thriving neighbourhoods.

Berkeley Homes supports the detailed objectives, particularly the desire to deliver new homes for existing residents, diversify the housing market to deliver a significant number of new flatted developments and provide quality private residential accommodation for workers from areas such as Canary Wharf.

ID	Name	Organisation	Comments
			<div> <div>number of flatted development in the locality with family accommodation”</div> <div>“Quality private residential to accommodate workers from areas such as Canary Wharf which has demonstrated the potential of the service sector markets to flourish, therefore providing opportunities for local jobs”</div> <div>Development Principles (page 17)</div> <div>“5. Creating a thriving new neighbourhood set within its landscape</div> <div>Charlton Riverside presents an opportunity to create a new neighbourhood of 3,000-5,000 homes in which the buildings can be set within the unique landscape of the Thames Barrier Park and the connected Maryon Wilson Park and Shooters Hill to the south.”</div> <div>The area is identified as an Opportunity Area in the London Plan with a minimum target of 3,500 new homes and 1,000 new jobs.</div> <div>Berkeley Homes fully supports the aspiration to exceed this minimum requirement and set a target of delivering 3,500 – 5,000 new homes in the area.</div> </div>
25	LXB Retail Properties PLC	LXB Retail Properties PLC	<p>On behalf of LXB Properties we wish to make comments on the Charlton Riverside Draft Masterplan SPD.</p> <p>Introduction</p> <p>As you will be aware, LXB Properties own and manage several key sites that form part of the Masterplan area and have had ongoing dialogue with the Council and local groups about how to bring forward regeneration in the area. To this end they instructed master planners, Think Place, to prepare an analysis of the existing Charlton Business Park area and develop a vision for how a co-ordinated redevelopment programme could take place. This Vision document has</p>

ID	Name	Organisation	Comments
			<p>already been shared with the Council and their advisers and we would welcome further discussion and input as the detailed work on the SPD Masterplan progresses.</p> <p>Our Comments</p> <p>We have structured these as follows:-</p> <ul style="list-style-type: none"> • Our overall comments in support of the draft Masterplan SPD; • Comments on the Background Information/Appendices; • Specific paragraphs/words that need to be amended, taken out, or added in. <p>1. Overall</p> <p>As a key stakeholder in the area we welcome and support the proposed vision for Charlton set out at the beginning of Chapter 2 (page 11).</p> <p>Chapter 3 sets out the strategic and detailed objectives for the Masterplan area and again, subject to some alteration to two paragraphs, we are supportive of these objectives and the delivery of the Vision, as set out in Chapter 6.</p> <p>2. Background Information/Appendices</p> <p>One other general point that we wish to make relates to how the draft report has been structured. The introduction refers to the inclusion of four appendices but instead these have become Chapters 7,8 and 9 under the heading “Background Information”. It is evident that the purpose of the background information is precisely that – the information is factual in nature and is best collated, as suggested in the introduction, in the form of appendices rather than forming part of the SPD itself.</p> <p>For instance, in the planning policy section under the reference to local policy, as set out on pages 35, 36 and 37, this should be an accurate reflection of the saved policies from the UDP (particularly Policy J3 and TC16) and the Draft Core Strategy (November 2010) including the policy relating to Charlton Riverside, EA2. However, until the Core Strategy has been formally published and revised following the consultation responses, then little weight can be placed on it. Therefore the text incorporated within these 3 pages is not policy specific nor does it actually duplicate the text in either the Core Strategy or the Unitary Development Plan. For instance the sentence “There is no capacity for additional retail floorspace.....” does not appear in either the UDP or the Draft Core Strategy.</p> <p>3. Specific Comments</p> <p>1. Paragraph 3 page 9 – delete the last sentence of that paragraph and replace it with</p>

ID	Name	Organisation	Comments
			<p>“the Borough’s main concentration of out of centre retailing is located at Charlton”.</p> <p>3. Chapter 3, page 13, last bullet point in the first column – replace “Stitch together” with “Better connectivity between the retail and residential.....”</p> <p>4. Chapter 3, page 13, third column, second bullet point from the bottom – remove and replace with “consolidation through redevelopment of the existing retail/commercial to allow immediate improvements to the transport network”.</p> <p>5. Chapter 5, page 19, first column, last paragraph – delete – this point has already been made on page 17 under development principal number 7.</p> <p>We hope that our suggested amendments can be incorporated into the final version of the document and we look forward to working with the Council on the delivery of this exciting project.</p>
26	Mr Bill Ellson	Secretary Creekside Forum	<p>Dear Sirs,</p> <p>Thank you for the opportunity to comment on the proposed Charlton Riverside Masterplan.</p> <p>The masterplan should:</p> <ol style="list-style-type: none"> 1. Place a greater emphasis on employment, in accordance with London Plan Targets. 2. Show proper regard to Safeguarded Wharves policy as set out in both the London Plan and the draft National Planning Policy Framework. 3. Be in accordance with the Borough's Core Strategy, which is yet to be finalised. 4. Show proper regard to the Mayor's Supplementary Planning Guidance on Industrial Capacity (Mar 2008) 5. Show proper regard to the Mayor's Supplementary Planning Guidance on Land for Transport Functions (Mar 2007). 6. Show proper regard to the Mayor's draft Supplementary Planning Guidance on Land for Industry and Transport (Feb 2012) that is due to replace the Mar 07 & Mar 08 SPGs. 7. Place greater emphasis on the importance of the existing ethnic food wholesalers in Charlton in accordance with section 10 & Policy 10(i) (pages 68-9) of the draft SPG. 8. Show boundaries and areas clearly and definitively using proper Ordnance Survey data. 9. Be produced in an easy to use and print format (A4 portrait) <p>We are in complete agreement with the comments made on behalf of the Port of London Authority by Ms Lucy Owen in her five</p>

ID	Name	Organisation	Comments
			page letter. We are in broad agreement with the comments of Miss Judith Cooke on behalf of the Environment Agency and Mr Westell on behalf of Aggregate Industries UK Ltd.
27	Mr David Gardner	Convenor Charlton Rail Users' Group	<p>The Charlton Rail Users' Group welcomes the concept and broad thrust of the Charlton Riverside Masterplan. We will be confining our comments to the importance of rail transport, interconnectivity and the transformation of Charlton station and its environs.</p> <p>We support the ambition for a predominately public transport based Charlton Riverside community based on safe, attractive footpaths, separated cycleways, an improved bus service, a new commitment to renewing the Greenwich waterfront Transit that was abandoned by the Mayor in 2008, a refurbished Thames Barrier Pier with a thames Clipper riverbus stop and an enhanced bus service. However, we regret that while Charlton station is mentioned and the importance of the railway line for public transport access, no improvement in the station, service, connectivity or environs is suggested.</p> <p>It is imperative in our view, that Charlton is viewed as a single community and that the Riverside developments (new and old) are an integral part of the Charlton neighbourhood. This will be supported by the new schools, the enhanced retail facilities, improved bus services and the Green Corridor. However, the three most significant elements that will underpin these connections are:</p> <ul style="list-style-type: none"> • The downgrading of Woolwich Road between Charlton Church Lane and the A102 to an access-only, landscaped 20mph zone with a cycle lane, wider pavements and improved landscaping. This would include a radically redesigned junction at the Antigallican with all through traffic proceeding seamlessly along the A206 from Woolwich Road east then to Anchor & Hope and thence into Bugsby's Way and making it pedestrian and cycle friendly wit landscaping. • The transformation of Charlton Station as a Charlton Transport Interchange with a facility including waiting room, booking/information facilities, cafe and news/book stand - the site also affords the possibility for co-financing through retail and residential units in the same development - then with all the buses (161, 472, 486, and possibly 177 and 180) stopping outside. There would also be a new entrance/exit at the western end of the eastbound platform (at the side of the power station) to Troughton Road to allow commuters to reach the Travelodge and proposed major retail units adjacent very easily. • A Green bridge linking Maryon Park with Barrier Park. <p>We would also ask, to facilitate these improvements, and the transformation of Charlton station that the scope of the "Charlton Riverside" Masterplan area is extended southwards from Woolwich Road to the railway line. This would then also be consistent</p>

ID	Name	Organisation	Comments
			<p>with the southern boundary of the Charlton Riverside area identified in the GVA plan of Charlton Riverside for the LDA.</p> <p>Charlton station is used by 1.5m people a year with 8 trains an hour and 23 trains in the peak hours. It is the junction that serves both the Greenwich line and the Blackheath-Lewisham line which then reconverge at London Bridge to Cannon Street, Waterloo or Charing Cross. It is also the main overground station for the O2 and for Charlton Athletic. It is thus a showcase station, and yet the current building was a temporary cabin that replaced the bombed Victorian station just after WW2. Over 60 years later, it is still there but is very minimal and functional - not at all inviting or fit for purpose. With between 3000-5000 new houses (thus 6000-11000 new residents) on the northern side of the line, as well as new businesses, leisure facilities and business; Charlton station will become far more of a hub and the new development should fund its transformation. Any redevelopment should be in character and reinforce Charlton's green and village character, but there is still scope for a substantial building, but hopefully of outstanding design quality. This could then be the centrepiece that brings Charlton Riverside and the historic Village together.</p> <p>With a more attractive station, new entrance and improved connectivity, signage and paths - shoppers, employees, leisure visitors (including football fans), walkers (and cyclists) as well as the schools' students and staff will all be far more likely to use public transport thereby improving the very poor air quality standards that currently exist in that area.</p> <p>We further would like some consideration of using the Angerstein freight branch for passenger use. We very much understand and strongly support the use of this Branch for aggregates and other freight feeding the works and their wharves, but would ask that the possibility of extending this branch line either to North Greenwich or under the river to West Silvertown DLR and then Excel and Custom House DLR could add considerable to local connectivity and the Charlton Riverside PTAL rating at fairly low cost. This could be an overground, DLR or indeed a tube service (as there is already a third platform and tunnel at North Greenwich pointing in that direction).</p> <p>David Gardner</p> <p>for Charlton Rail Users' Group</p>
28	David Leal		The Charlton Riverside Draft Masterplan assumes that in the future:

ID	Name	Organisation	Comments
			<p>1. there are not going to be any dirty industries concerned with manufacturing, food processing, or recycling;</p> <p>2. there will be increased “non-traditional employment in creative, arts, cultural and training based companies”;</p> <p>3. there will be “quality private residential [development] to accommodate workers from areas such as Canary Wharf”;</p> <p>4. the Thames will be solely a “public amenity, with walking, cycling and other leisure opportunities”.</p> <p>All these assumptions are outdated, for the following reasons.</p> <p>1. A sustainable urban community has to have dirty industries. This is because an urban community consumes goods that have to be made and serviced, and then recycles goods at the end of their life. Such dirty industries have the potential to employ large numbers of people.</p> <p>It is socially and environmentally damaging to locate these industries far from the communities that they serve. If the industries are tens of miles away, then this requires people to commute long distances to work. If the industries are thousands of miles away, then people have no work.</p> <p>A dirty industry can also be a “smart industry”. In the future, recycling is going to be one of the smartest industries.</p> <p>2. There is not going to be increased employment in “creative, arts, cultural and training based companies”, because these sectors are heavily dependent upon discretionary spending by people, and upon government subsidies. At a time of economic crisis, people will spend on the necessities of life first, and government subsidies will not be there.</p> <p>3. Employment in the financial sector is declining and will continue to decline. It is irrational to believe that the future economy of the Borough of Greenwich will depend upon well-off commuters to the City and “Docklands”.</p> <p>4. The price of diesel fuel is increasing, and will continue to increase. This will make water transport increasingly important, and will make industrial sites with access to water transport a key resource for the Borough of Greenwich.</p>

ID	Name	Organisation	Comments
			<p>Sadly the Charlton Riverside Draft Masterplan is dismissive of industries based around recycling. The ELVD (2000/53/EC - End of Life Vehicle Directive) is given as a reason for removing recycling activities from Charlton. This is incorrect. This directive, and other EU directives such as REACH, require a new "smart" approach to recycling, and create a business opportunity.</p> <p>A strategic plan for the Charlton Riverside should not try to replicate the "Docklands" developments of the 1980's and 1990's. These developments did not serve local people well, and are in any case not possible at a time of economic crisis.</p> <p>Instead the strategic plan for the Charlton Riverside should look at innovative ways of building upon the industrial activities that are already there and the use of the Thames for transport. The plan should encourage the creation a network of companies involved in building materials, manufacturing, food processing and recycling. Many of these industries are dirty, but in the future they will be "smart"</p>
29	Mr Stewart Christie		<p>Please do not repeat the same mistakes as Woolwich. This will effectively create a "new" and "old" Charlton, split by a main road. Transport links should also be a pre-requisite of any new development if you are trying to avoid car use by not providing car parking spaces.</p> <p>While the industrial area in Charlton which is being zoned for residential is currently in dire need of redevelopment, a significant amount of EDF/LDA money over the last decade has gone to the area to east of the barrier. This area to the east of the park does concern me as significant development money has gone into decontamination, repair and regeneration of the light industrial units and office space in this section, and indeed attracting new businesses to the area. Most of this now appears to be zoned for housing.</p> <p>Please reconsider.</p>
30	Mr Stewart Christie		<p>This period of consultation should be better publicised and run for a longer period of time.</p> <p>I hope that future detailed proposals are allowed far greater scrutiny.</p>
31	Mr Tim Anderson		<p>Speaking as the Chair of 'The Friends of Maryon and Maryon Wilson Parks', the members generally welcome the Charlton Riverside Plan and especially the expansion of the Barrier Gardens/Barrier Park open space, the link between Maryon Park and the Thames Barrier. We also welcome the siting of the proposed skateboard facility near the secondary school.</p> <p>However, we want to point out that the council have given permission for the Greenwich Skateboard Co-operative to fundraise for</p>

ID	Name	Organisation	Comments
			<p>a skateboard facility in Barrier Gardens.</p> <p>As Barrier Gardens is a specially designed landscaped and planted green open space and the Charlton Riverside Plan has provision for a skateboard park in a more appropriate setting many of our members would like the council to reconsider the Barrier Gardens skateboard proposal.</p> <p>If a skateboard park is built in Barrier Gardens and the Charlton Riverside Plan comes to fruition, the new residents will have a noisy skateboard park immediately outside their new homes.</p> <p>I believe that the vision of a green link between Old and New Charlton and the Riverside area is very sound, but that it could be compromised by the rush to find a replacement site for the Woolwich Skateboard Park that is being lost to Crossrail.</p> <p>The Friends are not against the building of a new skateboard park or skateboarders in general, but we do not want to see it imposed up on planted landscaped green open space.</p> <p>In the light of the Charlton Riverside Plan, we ask Greenwich Council to reconsider the notion of a skateboard park in Barrier Gardens.</p>
32	Mr Roden Richardson	Secretary The Charlton Society	This is to confirm that the Society's consultation submission is in complete agreement with the submission made by Charlton Riverside Action Group (CRAG), of which the Society is a founder member.
33		London Fire and Emergency Planning Authority	<p>We write in order to make comment n the above named document. Please note that we act on behalf of the London Fire And Emergency Planning Authority (LFEPA) and that this representation is made on their behalf. For your information, the following LFEPA sites fall within the borough:-</p> <ul style="list-style-type: none"> • East Greenwich Fire Station – 325 Woolwich Road, London SE7 7RF. • Eltham Fire Station – 266 Eltham High Street, London SE9 1BA. • Greenwich Fire Station – 4 Blisset Street, London SE10 8UP.

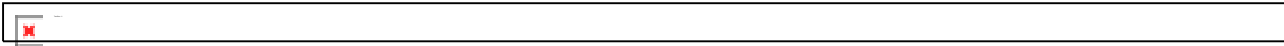
ID	Name	Organisation	Comments
			<ul style="list-style-type: none"> • Lee Green Fire Station – 9 Eltham Road, London SE12 8ES. • Plumstead Fire Station – 1 Lakedale Road, Plumstead SE18 1PP. • Woolwich Fire Station – 24 Sunbury Street, Woolwich SE18 5LU. <p>We note that this masterplan covers an extensive area, one within which East Greenwich fire station falls. LFEPA are somewhat concerned that the plan has been drawn up without any prior consultation with them, particularly bearing in mind that it appears to include the fire station site within an area ear-marked for commercial/retail development. The masterplan is silent on any reference to a possible relocation of the essential fire station, however, the creation of new residential neighbourhoods within the plan area reiterates the need for such a service to the community to continue.</p> <p>The LFEPA are not adverse to discussing the possibility of the provision of a new fire station facility, as part of the redevelopment of the masterplan area. Either way, it should be made clear within this plan, what the intention is. It is of high importance that the Council assist LFEPA in continuing to provide an effective and resilient emergency response facility within the borough, particularly bearing in mind the planned new development under this masterplan.</p> <p>We request that we be kept informed of progress with this plus further LDF documents. In addition, we wish to reserve our client's position to submit further representations on subsequent LDF consultations. Please do not hesitate to contact Mel Barlow-Graham should you require any further information or clarification.</p>
34	Mr Dick Allard	Westcombe Park Society	<p>The following are the comments of the Westcombe Society on the Master Plans for the Royal Borough of Greenwich. Our comments relate mainly to Charlton Riverside, Peninsula West and Woolwich but the more general points also apply to Eltham.</p> <p>Transport</p> <p>The Master Plans concentrate on creating an environment which is visually attractive and conducive to community development, and on the economic and social contribution of various elements to local development. These are clearly crucial issues. However, despite some welcome discussion of the need to promote sustainable forms of transport, there is no discussion of the impact that the proposals will have on the transport system and the harmful impact that high traffic levels have on pollution, noise and thus on quality of life. Currently there is a high level of congestion on both our roads and public transport so it is hard to see how the Master Plan proposals in their current form can have anything but a negative impact on an already congested transport infrastructure. The document gives inadequate consideration to transport infrastructure beyond making some suggestions about</p>

ID	Name	Organisation	Comments
			<p>possible extensions to the DLR and river transport as well as the cable crossing. In terms of public transport, we regard it as essential (even as part of the Vision) to indicate any part of the proposed development which (to avoid unacceptable levels of crowding on existing facilities) would be dependent on the DLR extension, or on other upgrades.</p> <p>Greenwich Peninsula is a very narrow neck of land surrounded on three sides by water with limited access routes. Charlton Riverside is adjacent to the peninsular and also suffers from significant congestion. It is therefore hard to take many of the proposals seriously, especially the proposal to create a 40,000 seat outdoor sports and leisure facility. The plan admits that there is very little scope for further parking and yet public transport fails to cope adequately with events at the O2 and the roads become congested not only on the peninsula itself but also in the approaches. There is no consideration of the effects of the proposed development on the areas adjacent to the peninsula.</p> <p>To achieve high quality developments, any proposals within the Master Plan, residential, industrial or leisure should be subject to the over-riding constraint that it is consistent with an overall reduction of road traffic within the Borough, and that any increase in demand for public transport is made contingent on increased provision. In respect of road use, this means that any anticipated increase in traffic from new developments (for people or goods) has to be small enough to be fully compensated by reductions in demand from existing developments. Additional road capacity, such as the proposed Silvertown Tunnel, will not help, as they will simply induce corresponding additional traffic unless accompanied by other measures to restrain traffic.</p>
35	Chris Smith	Greenwich Borough Liberal Democrats	<p>As a preliminary report much of the zoning looks sensible. The extension of Maryon Park to the river is an attractive idea, the east/west residential/commercial split makes sense in this regard as well. However we would urge that there be further emphasis on the stated "gradual" nature of this transformation especially if there is to be disruption to local businesses.</p> <p>We are concerned that the area to the east of the park has had significant development finance, to our knowledge, in order to regenerate the light industrial units and yet it is now being zoned for housing. The area zoned for residential use to the west is however in dire need of regeneration.</p> <p>Our preference is for as much as organic growth as possible but inevitably there is an element of imposition in schemes such as these. We would hope that there would be enough social amenities provided to give life and vibrancy to these new communities, especially as the architectural nature of some of the blocks looks aesthetically brutal. The proposals for new primary and secondary schools are welcome.</p> <p>The biggest negative for this region and scheme is transport however. The report acknowledges the existing severe difficulties of moving within this area and to and from it. No real solutions are mentioned and without this the scheme will struggle. A Greenwich Waterfront Transit Mk II is not something we would see as a likely solution.</p>

ID	Name	Organisation	Comments
36	Mrs Sarah Holland	Planner Cory Environmental Management Limited	<p>I write to you on behalf of Cory Environmental Holdings Limited ('Cory') to convey our concerns regarding the draft Charlton Riverside Masterplan Supplementary Planning Document (SPD).</p> <p>Background</p> <p>Cory has a long history of using the River Thames to transport waste from central London for disposal. Through utilising a network of wharves and Waste Transfer Stations it is possible to avoid approximately 100,000 heavy goods vehicle movements from London's roads per year when taking residual waste by river for treatment at our Riverside Energy from Waste Facility at Belvedere in Bexley.</p> <p>Cory is the largest commercial lighterage operator on the middle reaches of the tidal Thames. Its river business employs nearly 200 people, including lightermen and staff at waste transfer station wharves.</p> <p>Riverside Charlton is the home to Cory's Charlton Bargeworks which are the headquarters of the Cory's lighterage operation where the servicing and repair of Cory's fleet of tugs and barges is undertaken, and has done for over 100 years. The Bargeworks are located 0.7km to the west of the Thames Barrier on the northern side of Riverside Road between Lombard Wall to the west and Hope and Anchor Lane to the east. Located adjacent to the Bargeworks on the southern side of Riverside Road are Cory's head offices for our Human Resources and IT departments.</p> <p>Planning Policy Context</p> <p>Cory has operated a Bargeworks at this site since the 1880's, a reflection of the sites rich industrial and maritime setting. This industrial setting is something which is recognised and protected by the sites allocation within the Unitary Development Plan (UDP) as a Defined Industrial Area and an Aggregates Zone, UDP policies 31 and 32 respectively. As detailed in the UDP such employment locations are, "... <i>an essential aspect in safeguarding and enhancing the quality and range of employment opportunities in the Borough to address problems of social exclusion, a requirement that takes on increased importance when set against pressures to release brown field and riverside sites for housing.</i>"</p> <p>The Core Strategy for the Royal Borough of Greenwich is yet to be adopted and is still to undergo pre submission consultation and examination for soundness by an independent Inspector. However, the policies within the draft Core Strategy retain the sites allocation as a 'Strategic Industrial Location' as defined by draft Core Strategy policy EA4 and the associated draft Proposals Map</p>

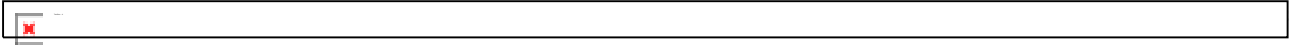
ID	Name	Organisation	Comments
			<p>(Map 3) a copy of which is appended to this letter. The requirement to manage and protect such industrial allocations is also a requirement of London Plan (2011) policy 2.17 which states, <i>"The Mayor will, and boroughs and other stakeholders should, promote, manage and, where appropriate, protect the strategic industrial locations (Sas... as London's main reservoirs of industrial and related capacity, including general and light industrial uses, logistics, waste management and environmental industries (such as renewable energy generation), utilities, wholesale markets and some transport functions"</i>.</p> <p>Sites which provide essential support in the continued use of the River Thames for freight transport, such as the Bargeworks at Charlton are also protected by London Plan policies 7.24, 7.26 and 7.27.</p> <p>General Comments on Draft Masterplan SPD</p> <p>Page 9 of the draft Masterplan document states that, <i>"Royal Greenwich also wishes to look beyond the existing industrial designations in the UDP and the London Plan and to develop an innovative vision for the area that maximises its economic and community potential"</i>. From the above statement it is not clear how this objective relates to the aforementioned adopted and emerging Development Plan policies which look to safeguard strategic industrial areas.</p> <p>It is essential that suitable provision for, and adequate separation of, industrial land uses is maintained. The vision outlined on page 11 does not seem to make this distinction when it refers to, <i>"The retail and industrial uses will be consolidated and rationalised within a much improved environment..."</i> There is no reference here to maintaining and protecting long standing industrial uses (and associated specialist employment) such as Cory's operation at Charlton. This vision seems at odds with the protection afforded to industrial land allocations within the Development Plan. As referred to above London Plan Policy 2.17 requires boroughs to promote, manage and where appropriate, protect such industrial locations. These policies are intended to safeguard employment uses within industrial areas; such safeguarding does appear to be reflected within the draft Masterplan document.</p> <p>Page 48 of the draft Masterplan document makes reference to, <i>"Several jetties (generally now disused) are scattered throughout the study area, suggesting at one time the river opportunities"</i>. Such a development principle would cause serious concerns on operational safety grounds, and again, seems at odds with the protection and enhancement of an allocated industrial area.</p> <p>It is understood that this draft Masterplan SPD is at its first phase of public consultation, and therefore the master planning for this area of Charlton are at a very early stage of development. I hope that you find this letter helpful in understanding Cory's operation at the Charlton site and that this information proves helpful in developing the draft Masterplan document.</p>

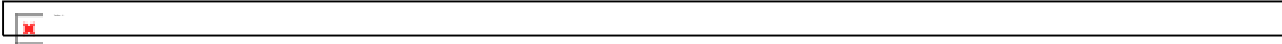
ID	Name	Organisation	Comments
37	Tim Holmes		<p>I have a number of questions regarding the Charlton Master plan and I would be very grateful if you could provide me with some answers.- Where is the funding for the development coming from?</p> <ul style="list-style-type: none"> - How much money is in the budget? - How will you go about developing land you don't own? - What is the future of the wharves/riverside as an industrial location? - Will reducing parts of the Woolwich Road cause congestion? - How will you attract additional businesses?
38	Mayor of London	Mayor of London Greater London Authority	<p>Thank you for your letter consulting the Mayor of London on the draft stage of Charlton Riverside; Peninsula West; Woolwich and Eltham Supplementary Planning Documents (SPD). The Mayor has afforded me delegated authority to make comments on his behalf on emerging SPIDs. The GLA welcomes the opportunity to consider the documents at this draft stage. These comments are officer —level only and do not preclude any further comment the Mayor may make on future consultation phases of the Council's Local Development Framework.</p> <p>The following comments relate to all of the documents:</p> <p>Overall transport</p> <p>The masterplans are very high level and 'visionary'. Although TfL has no objection to boroughs producing such documents, they must have been developed with an appropriate consideration of current and potential transport provision, in line with London Plan policies 6.1 (strategic approach) and 6.3 (assessing the effects of development on transport capacity). These four masterplans appear not to have been assessed for current and future transport accessibility and capacity, as required by the London Plan, and assume transport schemes that are not being actively planned and do not appear in the London Plan, Mayor's Transport Strategy (MTS) or east London Sub Regional Transport Plan (SRTP). Adopting the masterplans as supplementary planning documents (SPD) is therefore considered to be premature.</p>

ID	Name	Organisation	Comments
			<p>As SPD, the masterplans will carry more planning weight than is considered appropriate for the level of assessment undertaken to develop them. Publishing before consideration of strategic transport impacts, capacity and requirements via for example the preparation or updating of Opportunity Area Planning Frameworks (OAPFs), also seems inappropriate. In the case of Eltham town centre, there is no OAPF, so the masterplan itself should be subject to further strategic</p> <p> transport assessment. If the masterplans are to be adopted as SPD, they should be heavily caveated along the lines of:</p> <p>'This masterplan is subject to assessment of its strategic impact on transport and other infrastructure, achieved as appropriate through the OAPF/masterplan process. In addition, individual planning applications should, as per local and London Plan policy, be accompanied by a transport assessment'.</p> <p>The masterplans also raise the following specific concerns that could conflict with London Plan and MTS policies and could have implications for transport operations. These concerns are outlined in more detail below, along with highlighting factual errors. TfL is making a separate response to RBG in respect of its development and commercial land holdings.</p> <p>Overall Strategic Industrial Land release</p> <p>The Mayor's Draft Land For Industry and Transport 2012, which is currently out for consultation, sets out that there is no capacity for employment land release in Greenwich for the period 2011- 2031. However Greenwich is still in the limited transfer category and as such there is some flexibility for release if this is backed up by robust local evidence.</p> <p>On a sub-regional basis within the South East London sub-region the actual quantum of industrial land release (54 ha) has been higher than the recommended 2010 Benchmark figure of 33 ha. The majority of this release has been in Greenwich and Southwark. While these rates of release are slightly higher than-the comparative benchmark period figures, they are within the overall Benchmarks release timeframe release figures of 2006 to 2026 (which equates to 146 ha release in South East London).</p> <p>Overall energy</p>

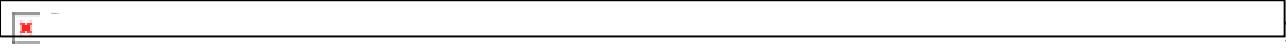
ID	Name	Organisation	Comments
			<p>Consideration should be given to the development of a district heating network. Comments on each of the documents are set out below:</p> <p>Charlton Riverside</p> <p>The SPD sets out the following vision for Charlton Riverside:</p> <p><i>'By 2027, Charlton Riverside will be transformed into a new urban quarter connecting Greenwich Peninsula to Woolwich Town Centre. It will comprise of a sustainable mix of uses including substantial residential use in a high quality environment focussed around an enhanced Thames Barrier Park. There will be a thriving education and creative industries hub in the eastern historical quarter surrounded by a mix of high quality, residential led uses including high quality business space. The retail and industrial uses will be consolidated and rationalised within a much improved environment and the area overall will be serviced by new and improved public transport links plugged into the transport network and</i></p> <div data-bbox="586 608 1861 667" data-label="Image"> </div> <p><i>will have benefited from improvement</i></p> <p><i>to the Thames Path. The growth will have been supported by infrastructure that will have been provided in a co-ordinated and timely manner to meet the physical and social needs of new development and regeneration. Charlton Riverside will be a flourishing industrial, business and retail area contributing to the success of the Thames Gateway and a great place to invest, live and work.'</i></p> <p>Principle</p> <p>Charlton Riverside is designated an opportunity area in the 2011 London Plan which sets out the following for the area:</p> <p><i>'Development at Charlton Riverside should be integrated with the wider development of the south bank of the Thames to complement opportunities at Deptford/Greenwich, Greenwich Peninsula and Woolwich. Any managed release of surplus industrial land should be set in a wider sub regional context as part of the planning framework for the Area, taking into account safeguarded wharves such as Murphy's and Angerstein with its strategic railhead.'</i></p> <p>An indicative employment capacity of 1,000 is set out together with a minimum of 3,500 new homes.</p>

ID	Name	Organisation	Comments
			<p>The principle of intensification of residential in the opportunity area is in line with London Plan policy however further discussion is needed around the details of the approach.</p> <p>Employment land release</p> <p>The GLA have raised non-conformity objections to the de-designation of Strategic Industrial Land in Charlton Riverside in the Core Strategy consultation. As set out below:</p> <p>"Whilst some consolidation of the Charlton Riverside SIL may be acceptable, given the non-industrial uses currently included in the SIL and subject to strategic and local assessments, the level of consolidation implied by the Key Diagram would almost certainly exceed the strategic monitoring benchmarks for release.</p> <p>As such the proposals in the draft core strategy to de-designate SIL at Chalton Riverside are not in general conformity with the London Plan.....</p> <p>It is acknowledged that both Charlton Riverside and Greenwich Peninsula West are opportunity areas and have the potential for substantial development however, a suitable balance needs to be struck between housing development and retention of SIL. Further discussion will be needed with the Council particularly on its evidence base for these proposals. The Council's intention to produce area action plans or opportunity area planning frameworks for these areas is welcomed and the GLA is of the view, as expressed previously in meetings and responses to policy documents, that decisions on the exact quantum of SIL release and the exact location and nature of subsequent development should be progressed through the production of such plans or frameworks. The GLA would welcome working in partnership with the Council in this regard."</p> <p>Since this time limited further information and justification has been provided and limited discussions have taken place.</p> <p>The Charlton Riverside SPD does not set out a quantum for SIL release however from the diagrams GLA officers have estimated that around 65 hectares of 5IL is proposed to be released (66% of the Total Sill.</p> <p>Whilst there is flexibility for some SIL release further evidence is needed in order to assess if such a high level of release is acceptable. To inform further discussions a full employment land review should be prepared together with a schedule of the</p>

ID	Name	Organisation	Comments
			<p>employment and retail uses already within the</p> <p> area, the levels of employment currently on the sites, the rationale behind consolidation of retail and the rationale behind the cultural quarter.</p> <p>Retail</p> <p>The document does not set out the level of retail which is proposed and if an increase or decrease in the level of floorspace is intended. Increase in retail in this 'out of centre' location is not supported. Any increase in retail will need to be justified by a PPS4 assessment.</p> <p>Safeguarded Wharves</p> <p>The document retains a land allocation for the current safeguarded Angerstein and Murphy's wharves. These wharves are strategically important in that they are large sites handling marine dredged aggregates and are important to the supply of aggregates throughout London and beyond. Their importance is further enhanced by the presence of a rail link that serves the sites. The Mayor's recent consultation on the review of Safeguarded Wharves recommends the continued safeguarding of these wharves, they handle over 2 million tonnes per year. The loss of either or both of these wharves would result in a significant increase in HGV movements into London and would be strongly resisted by the Mayor.</p> <p>The fact that an allocation is made is generally welcomed. However, there is concern about the term "smart wharf" considering the nature of wharf operations with all their impacts, their land transport needs and the benefits of co-location with processing, storage. There is also a concern in terms of the proximity of sensitive residential uses as proposed in 'West Charlton'.</p> <p>Riverside wharf appears to be de-designated. This is a matter of significant concern and a conflict with London Plan policy 7.26 as the recent consultation on the review of Safeguarded Wharves recommends retaining this wharf in order to contribute to London's projected long-term needs. The site is currently in active use as an aggregate wharf.</p> <p>Moreover there is an operational barge works in Riverside Wharf. London Plan policy 7.27 (Blue ribbon network: supporting</p>

ID	Name	Organisation	Comments
			<p>infrastructure and recreational use) states that waterway support infrastructure such as boatyards should be protected.</p> <p>River related land uses</p> <p>— In considering future uses, the Council should investigate the opportunities for a strategic boatyard. Work undertaken by the GLA has indicated the need for an additional facility (in addition to the relocation of Thamescraft Dry Docking to Bay Wharf) to serve the growing number of larger passenger vessels operating on the Thames.</p> <p>The SPD does not appear to give any particular consideration to recreational uses of the river such as sailing or boating marinas/clubs. This Would support London Plan policy 7.27. In particular given Greenwich's maritime history, this appears to be a missed opportunity.</p> <p>Flood Risk</p> <p>The area is located adjacent to the tidal River Thames. However, the SPD does not appear to consider any long term implications of tidal flood risk nor of the recently produced</p> <p> Greenwich</p> <p>Surface Water Management Plan. This is considered to be an omission in the light of London Plan policies 5.12/5.13 and reference should be made to the Environment Agency Thames Estuary 2100 project and to the SWMP.</p> <p>Transport</p> <p>There is no TfL operational property in the masterplan area, nor any specific strategic transport proposals. The A206 is part of the Strategic Road Network (SRN), therefore it is important to consider the impact of development in this area on the movement of traffic on this road, in accordance with London Plan policy 6.11 (smoothing traffic and tackling congestion). This will be particularly important when considering how to improve pedestrian and cycle movement across the road, as is highlighted as a key issue in the</p>

ID	Name	Organisation	Comments
			<p>masterplan.</p> <p>TfL would support a public transport corridor through the area which would parallel the A206. However, in this context, the masterplan mentions a 'successor to Greenwich Waterfront Transit' (GWT). The GWT project was cancelled by the Mayor in 2008. London Plan policy 6.7 requires development plan documents (DPDs) to promote 'bus, bus transit and tram networks.' Therefore it would be more appropriate and accurate to delete reference to GM (specifically (unless explaining historical background in a factually correct manner) and to refer to 'improvements to bus services'. The public transport corridor will need to be planned and integrated into development proposals from the outset, Millennium transitway through Greenwich Millennium Village being a good example of this.</p> <p>It will be important to ensure the public transport corridor through the master-plan area is controlled in terms of access to general traffic and is ideally reserved for public transport, walking and cycling only. This will minimise 'rat running' opportunities for vehicles wanting to avoid congestion on the A206. Furthermore it will be necessary to ensure that the corridor does actually improve journey time for public transport and for example vehicles are not delayed getting onto and off the route. Any road proposed that creates new network capacity will need to meet the criteria set out in London Plan policy 6.12 (Road network capacity).</p> <p>The masterplan also mentions 'hopper buses'. TfL does not use this term, as all bus services form part of the wider network, developed with consistent service planning guidelines. How the area could be best served by bus would be looked at as part of the OAPF process.</p> <p>The cycle superhighway CS4 is planned to run to Woolwich from London Bridge, so this should be integrated into the masterplan, perhaps utilising the public transport corridor.</p> <p>The masterplan does not address the potential transport impacts arising from redevelopment of industrial sites.</p> <p>The Woolwich Ferry is provided by Serco for TfL, not RB Greenwich (page 49).</p> <p>The masterplan contains considerable detail on the architectural/urban design vision but nothing about aspirations for sustainable mode shift, for example meeting the future mode share targets contained within the SRTP or the approach to car parking.</p>

ID	Name	Organisation	Comments
			<p>The delivery chapter (Chapter 6) does not address funding issues. An approach to borough community infrastructure levy (CIL)/s106 funding could be outlined to give developers early</p> <p> guidance as to what will be expected, for example by identifying key pieces of infrastructure that will be required to support the masterplan and that could be funded by a local CIL.</p> <p>Conclusion</p> <p>Whilst the GLA welcome the decision to produce an AAP for the area the level of SIL proposed, the SMART wharf proposed and the loss of strategic wharf is not in general conformity with the London Plan. The phasing of the release of industrial land also needs to be considered. The amount of development capacity being brought forward at one time is significant and even if the land uses were to be agreed would take a considerable amount of time to deliver. This may have the consequence of existing sites being vacated, jobs lost and a considerable gap occurring before development. Further discussions are needed regarding these matters including the deliverability of the proposals before they can be considered acceptable. GLA officers would welcome an early discussion around the revised wording for the submission version of the Core Strategy which it is understood will be consulted on shortly.</p>
39	Metropolitan Police Authority	Metropolitan Police Authority	<p>I write on behalf of our client the Mayor's Office for Policing and Crime / Service (MPA/S) with regard to the above draft documents. They have been reviewed by CgMs on behalf of the MOPC/MPS, mindful of relevant national and local planning policy, and we therefore make the following observations and recommendations.</p> <p>The MOPC/MPS provide a vital community service to the Royal Borough of Greenwich and policing is recognised within the 2011 London Plan as being an integral part of social infrastructure. It is essential that the MOPC/MPS are well represented within the emerging LDF documents and these masterplans in order to ensure that the impact of new development upon policing can be mitigated.</p> <p>Context to Represent ti'ons</p> <p>The provision of effective policing is of crucial importance across London to ensure safe places to live are created as part of a</p>

ID	Name	Organisation	Comments
			<p>sustainable community consistent with planning policy. I therefore refer briefly to relevant policies regarding the consultation masterplan documents below:</p> <p><i>National Policy</i></p> <p>The MPA are mindful that PPS1 states that Councils should prepare development plans which promote inclusive, healthy, safe and crime free communities Also Circular 05/05, paragraph B9, advises that developers may be expected to pay for or contribute to the cost of all, or that part of additional infrastructure provision, which would not have been necessary but for their development.</p> <hr/> <p>One of the objectives of the Draft National Planning Policy Framework (NPPF) July 2011 is to deliver the right community facilities, schools, hospitals and services to meet local needs (para 124).</p> <p><i>London Plan Policies</i></p> <p>At strategic level, paragraph 1.40 of the London Plan (July 2011) states '<i>a growing and increasingly diverse population will create demand for more social infrastructure</i>' which, by definition, includes policing and other criminal justice or community safety facilities.</p> <p>This is reflected in Policy 3.16 Protection and Enhancement of Social Infrastructure which states that '<i>London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population</i>'. Paragraph 3.89 further notes that existing or new developments should, wherever possible, extend the use of facilities to serve the wider community, especially within regeneration and other major development schemes.</p> <p><i>Local Policy</i></p> <p>In addition, policies SC1 and CI of Greenwich's Unitary Development Plan provide overall support for community services and facilities and Annex G of the Planning Obligations SPD (Adopted September 08) strongly support the provision of policing facilities in the borough.</p> <p>Given the support for policing within the national and regional planning policy context, it is therefore appropriate to ensure that the needs of the MOPC/MPS are reflected within the masterplan documents.</p>

ID	Name	Organisation	Comments
			<p>General Representations</p> <p>In line with the overarching policy, it is key for the emerging masterplans to be supportive of policing and the provision of policing.</p> <p>Key to this is the provision of new policing facilities in line with development growth in the four masterplan areas. The MOPC/MPS are mindful that significant additional development is likely to come forward within the four masterplan areas through the introduction of new uses and the intensification of existing uses. The scale of development will increase demands on police resources and the MOPC/MPS request that this impact upon policing be regarded as a material consideration during application determination process and that this is reflected within the emerging masterplans. This would ensure the masterplans are in accordance with London Plan Policies, in particular 3.16, and policies SCI and CI of Greenwich's UDP. Additional wording in each masterplan supporting the provision of contributions towards policing would address the issue.</p> <p>Safety and security through good design is key in ensuring crime reduction. Secured by Design is an important initiative promoted by the Metropolitan Police to ensure a safe and secure environment is created within development proposals. Section 16 of PPS1 states that plan policies should deliver safe, healthy and attractive places to live. The inclusion of Secured by Design (and other similar measures) in the emerging masterplans is required.</p> <p>It light of both points above, it is requested that the MOPC/MPA are consulted in relation to all major applications in the masterplan areas.</p> <p>There are two MOPC/MPS properties located within the Charlton Riverside Draft Masterplan area. A patrol base at Unit 9, Melish Industrial Estate and a Warehouse at Units 7-9 Meridian Trading Estate. The MOPC/MPS wish to retain these properties; it is recommended that the document reflects this.</p>
40	Janet Goulton	Planning and Development Manager London City Airport Limited	<p>We would like to thank you for your email inviting London City Airport to comment on the Masterplans in place for Charlton Riverside, Woolwich Town Centre, Greenwich Peninsula West and Eltham Town Centre.</p> <p>Aerodrome safeguarding ensures the safety of aircraft and their occupants when in the vicinity of an aerodrome by controlling potentially contentious development and activity around it. London City Airport has a very specialised set of safeguarding surfaces which surround the airport, approved by the CAA, to ensure that building heights do not interfere with safe aircraft operations.</p>

ID	Name	Organisation	Comments
			<p>Our support for development and regeneration in London is complimented by our approach to aerodrome safeguarding and consequently we would like to draw your attention to the Civil Aviation Authority's (CAA) documentation entitled <i>CAP 738 Safeguarding Aerodromes</i> and specifically <i>Appendix C London Tall Buildings Policy</i>. This document specifies the CAA's policy with regard to future buildings or other construction developments and the need to maintain the safe and efficient use of airspace over London.</p> <p>Whilst London City Airport in principle supports the proposals put forward and is keen to assist with the sustainable development of the area, it must be stressed that early consultation on the above issue in conjunction with the CAA's London Tall Buildings Policy is vital, and we actively encourage developers to bear this in mind throughout the planning stages.</p>
41	Carmelle Bell	Planning Administrator Thames Water Plc	<p>As you will be aware from previous representations, Thames Water are the statutory water and sewerage undertaker for the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2004 (as amended in May 2008). The provision of water and waste water infrastructure is essential to any development.</p> <p>We have the following comments on the consultation document:</p> <p>Waste Water/Sewerage and Water Infrastructure</p> <p>A key sustainability objective for the preparation of the new Local Development Framework should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 5.1 of PPS12 relates to other Development Plan Documents (DPDs) and states:</p> <p><i>“ LPAs should consider the following criteria when determining which DPDs other than the core strategy they produce:.....In considering these questions, the following issues should be considered:</i></p> <p><i>- the requirements of utilities/infrastructure providers... ...”</i></p> <p>Policy 5.14 of The London Plan, July 2011 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and states:</p>

ID	Name	Organisation	Comments
			<p><i>“Strategic</i></p> <p><i>A - The Mayor will work in partnership with the boroughs, appropriate agencies within London and adjoining local authorities to:</i></p> <p><i>a) ensure that London has adequate and appropriate wastewater infrastructure to meet the requirements placed upon it by population growth and climate change</i></p> <p><i>b) protect and improve water quality having regard to the Thames River Basin Management Plan</i></p> <p><i>Planning Decisions</i></p> <p><i>B - Development proposals must ensure that adequate wastewater infrastructure capacity is available in tandem with development. Proposals that would benefit water quality, the delivery of the policies in this Plan and the Thames River Basin Management Plan should be supported while those with adverse impacts should be refused.</i></p> <p><i>C - Development proposals to upgrade London’s sewage (including sludge) treatment capacity should be supported provided they utilize best available techniques and energy capture.</i></p> <p><i>LDF preparation</i></p> <p><i>E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel.”</i></p> <p>Policy 5.15 of the London Plan relates to water use and supplies.</p> <p>It is unclear at this stage what the net increase in demand on our infrastructure will be as a result of the proposed development. However, the masterplans need to consider the net increase in waste water and water demand to serve the development and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.</p>

ID	Name	Organisation	Comments
			<p>The list of issues covered in the masterplans should therefore make reference to the provision of sewerage and water infrastructure to service development. This is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.</p> <p>To accord with PPS12 and the London Plan text along the lines of the following section should be added to the framework:</p> <p>“Water Supply & Sewerage Infrastructure</p> <p><i>It is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.</i></p> <p><i>Further information for Developers on water/sewerage infrastructure can be found on Thames Water’s website at: http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm</i></p> <p><i>Or contact can be made with Thames Water Developer Services</i></p> <p><i>By post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY;</i></p> <p><i>By telephone on: 0 845 850 2777;</i></p> <p><i>Or by email: developer.services@thameswater.co.uk”</i></p> <p>Thames Water would also welcome the opportunity to work closer with the Local Authority to better understand the proposals as they evolve with time.</p>

ID	Name	Organisation	Comments
			<p>Other Comments</p> <p>We would also like to draw your attention to the following issues with regards to the draft AAP:</p> <p>Tree Strategy and Planting –</p> <p>Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system and water supply infrastructure. In order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.</p> <p>Access –</p> <p>Thames Water will require 24 hour vehicular access to any pedestrianised area to undertake emergency works. Access to the sewerage and water supply infrastructure must not be impeded by street furniture. This will enable Thames Water to operate the network with as little interruption to the service as is possible.</p> <p>6 Catering Establishments –</p> <p>Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in properties suffering blocked drains, sewage flooding and pollution to local watercourses.</p>
42	Ms Anna Townend	Greenwich Environment Forum	<p>SUMMARISED FROM HAND WRITTEN VERSION</p> <p>1. Reminded of the 'Riverside Strategy' concept developed by the Greenwich Environment Forum for the whole of the Greenwich Riverside area from Deptford to Woolwich in the early 1980s, which re-emerged as the Borough 'Waterfront Strategy'</p> <p>2. Community participation will be key to the implementation of Charlton Riverside and we hope that the current deficient</p>

ID	Name	Organisation	Comments
			<p>consultation will NOT be repeated when the completed masterplans go forward to the Core Strategy</p> <p>3. With its long heritage of ship building, the area is a treasure inherited from previous bold adventurers. How to recreate their activity in modern terms and recover that energy is a major responsibility for Greenwich.</p> <p>4. High rise along the river, housing many more people with rising water levels from climate change and water supplies declining is demonstrably unsustainable</p> <p>All 3 of the riverside masterplans, - Charlton Riverside, Greenwich Peninsula and Woolwich - lack a sustainable development approach even though this is a critical part of the planning system (Planning Policy Statement 1). We seek changes to the vision and objectives of all 3 masterplans so that environmental, economic and social sustainability are brought to the centre of the documents.</p> <p>Environmental sustainability</p> <p>The vision and objectives should engage wholeheartedly with waterside issues, and draw attention to the value and importance of protected wharves and facilities.</p> <p>The objectives should include:</p> <ul style="list-style-type: none"> - To maximise the potential for freight transport by river, the aim is to safeguard

ID	Name	Organisation	Comments
			<p>all wharves providing access points for freight along the riverfront.</p> <p>- A presumption against tall buildings along the riverside, given their seriously negative effect.</p> <p>The riverside is a very green area, so it is surprising that the vision and objectives do not give a high priority to the protection and enhancement of green space, including natural habitat.</p> <p>The proposed developments will increase traffic, and measures need to be taken to protect air quality. These should be stated as objectives, including Low Emission Zones.</p> <p>We would like to understand the impact of development on carbon emissions and there should be a commitment to carbon accounting.</p> <p>Economic sustainability</p> <p>Some of the objectives - for example for Charlton Riverside - have a lot to say about employment, but the vision in each document is to relocate (at best) existing businesses and industries, to delete some of the strategic industrial locations and to use employment</p>

ID	Name	Organisation	Comments
			<p>land for residential development. Even the proposed Charlton Garden City is characterised by its residential function, ignoring the important economic base that informs the Garden City model.</p> <p>In the London Plan, these areas are set a target for employment growth, ranging from 1,000 new jobs at Charlton Riverside to 7,000 new jobs at Greenwich Peninsula.</p> <p>Therefore, the vision for all 3 must include the aspiration to achieve employment growth, clearly stated as a net increase in jobs. To be sustainable the vision should also be towards a low carbon economy.</p> <p>Several objectives will assist in the delivery of more jobs and a low carbon economy.</p> <p>There must be reference to higher education growth, high tech industries, investment in engineering and architecture. But this is the high end and there is also the need - and this is the part that is missing - to really address low wages and poor conditions in retail, catering, cleaning, personal care, repair and maintenance. There must be reference to the London Living Wage, to training opportunities, and to economic diversification .</p>

ID	Name	Organisation	Comments
			<p>The objectives should be proposing a variety of green jobs, and there should be recognition of the voluntary sector contribution to the economy, including social enterprises. A vision of local sourcing, local procurement of services, support for local shops, businesses and street/covered markets would also help promote more sustainable local economic activity.</p> <p>Social sustainability</p> <p>The vision should be for a lifetime neighbourhood and a walkable community, where all amenities and services are within walking distance. This includes local shops, play areas and community meeting spaces as well as local education and health provision. These are all very important social infrastructure which must be explicitly mentioned.</p> <p>The objectives should also make clear that affordable family housing is the highest priority</p> <p>We note the deficiencies in the consultation on these masterplans and we expect there will be a far more collaborative approach to the production of the Core Strategy</p>

ID	Name	Organisation	Comments
			submission document. We look forward to discussing with you how sustainable development can be at the heart of the Core Strategy.
43	Waite		<p>I PRESENTATION AND VENUE.</p> <p>I.I The CAFC venue (20 February) was difficult to find (no signs), and the 4.00pm presentation was full of " bizspeak" and lacklustre. Some photographs shown were inaccurate ("All Saints' Church, Blackheath" was actually St John' s, Blackheath Standard with Fossdene School prominent in the view); and there was confusion between Thames Barrier Park (on the north bank) and Barrier Gardens (on the south bank). There were very few answers to questions, and a strong impression that the study had been made by people who did not know the area and had not bothered to check details/proof read. This does not inspire confidence.</p> <p>2 COMMENTS</p> <p>Although a regeneration of the Charlton Riverside area would be welcomed, it is very disappointing that the area is seen only as the "missing piece" in joining the Woolwich</p>

ID	Name	Organisation	Comments
			<p>Dockyard area and Greenwich Peninsula. No attempts are being made to integrate the sections of Charlton Riverside with each other and with the rest of Charlton.</p> <p>2.1 Education</p> <p>Charlton needs more schools now, not in some rosy future. The proposed locations, however, raise concerns as these are close to main roads/heavy traffic raising both road safety and air quality issues. School provision should take priority, but the sites should not be on main roads.</p> <p>2.2 Retail</p> <p>i) Concentrating retail at the western edge of the area, (north of the A206, between Anchor & Hope Lane and Hom Lane) will have an adverse impact on Charlton south of the A206 which will see additional traffic and a further reduction in the already poor air quality.</p> <p>ii) The type of retail proposed is not clear, but there have already been soundings about a Sainsburys and Marks & Spencer on the former Wickes' site, with entry via the</p>

ID	Name	Organisation	Comments
			<p>Woolwich Road, several roundabouts and a proposed 700 vehicle capacity car park. How does this fit in with the Masterplan concept of a "High Street" retail area of pathways and more small-scale shopping areas? There is a real danger of some schemes being allowed in the near future, only to be demolished in a few years time so as to make way for what the Masterplan describes; and even this still mentions that "swathes of car parking" would exist along the Woolwich Road.</p> <p>Concentrating retail in one area is not going to aid integration within Riverside or with the existing community, but will create a shopping ghetto and increase traffic in the area between Anchor & Hope Lane and Hom Lane. Retail should be spread more evenly over the area.</p> <p>2.3 Housing</p> <p>i) There will be a huge cost to decontaminate land and to provide much of the infrastructure. Private developers will have to be brought on board and they will want to maximise land use so as to maximise profits. There is no assurance of low-rise, low</p>

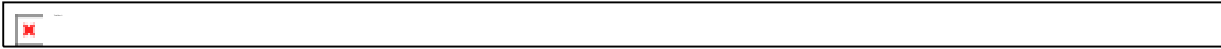
ID	Name	Organisation	Comments
			<p>density building and the reality is likely to be high density if not high-rise.</p> <p>ii) The proposal to concentrate housing in a central "block" will cut off residents from the rest of Charlton, except when access to the station is needed. Housing should be more evenly apportioned along the length of the Riverside development to improve east-west integration and integration with the rest of Charlton.</p> <p>iii) Why this emphasis on "Georgian" style when Charlton was developed in the Victorian/Edwardian era? If "houses with front doors and rear gardens" is meant, then please say so and avoid all this tweeness.</p> <p>2.4 Transport</p> <p>i) The idea of making greater use of the river is welcomed, but there are no clear ideas of other transport improvements.</p> <p>ii) Why not make greater use of the Angerstein rail link?</p> <p>iii) The Woolwich Road (A206) is very busy, and is destined to become even more so, no matter whether it continues along its present course, or has most of the through-traffic rerouted</p>

ID	Name	Organisation	Comments
			<p>along Bugsbys Way. The Riverside development will bring a substantial increase in vehicles, with concomitant stress and reduction in air quality so pollution must be tackled vigorously.</p> <p>The Woolwich Road itself needs revamping, allowing pedestrians priority at some points.</p> <p>The junction with Church Lane/Anchor & Hope Lane must be improved.</p> <p>iv) There is no information about the proposed successor to the Waterfront Transit Scheme; and no information about how south-to-north links through Charlton are envisaged. "Improved links" is likely to mean "Additional links" so there are real risks of Charlton Church Lane becoming a major bus route and Victoria Way becoming a rat run for private cars accessing the retail sites.</p> <p>v) There should be an integrated transport hub around Charlton station, allowing access to rail and bus routes without people having to run between stops and across busy roads.</p> <p>2.5 Environment</p> <p>i) Air Quality is of grave concern, as more vehicles are inevitable.</p>

ID	Name	Organisation	Comments
			<p>ii) There needs to be massive "greening" in order to reduce pollution.</p> <p>iii) The historic view from the river to St Luke's Church, Charlton, has been entirely ignored again, as it was in the Draft Core Strategy. St Luke's has long been a landmark from the river and was used as a navigational aid and for Admiralty chartings, being authorised to fly the British Ensign from its tower on St George's Day and St Luke's Day. The sightline from the river to St Luke's should be protected.</p> <p>2.6 Local Businesses Employment</p> <p>There has been little thought given to existing businesses along "Riverside". There needs to be much more attention to employment, as without any clear plans for relocation/compensation, it is feared that jobs would be lost, not brought in to the area.</p> <p>3 OVERALL IMPACT AND SENSE OF COMMUNITY</p> <p>A regeneration of Riverside is to be welcomed, but it is very dispiriting to see how the rest of Charlton is being ignored and how the attitude is "This is what you will have so get used to it". Why bother with a consultation exercise if this is what is to happen?</p>

ID	Name	Organisation	Comments
			<p>If this plan goes ahead unaltered, Charlton Riverside may have amenities, but it will be largely isolated from the rest of Charlton; and Charlton south of the A206 will have very little except increased road traffic, worsening air quality; decreasing numbers of trees and green spaces, and even poorer shopping facilities on the already degraded neighbourhood parades.</p> <p>The existing area is being sacrificed to allow Riverside to be born. PLEASE RETHINK.</p>
44	Steve Hunt		<p>Request</p> <p>We would like to see the plan include our local area, from the River to the Railway line.</p> <p>1. <i>Greater Charlton</i></p> <p>An access-only Woolwich Road West. The Master Plan's proposals to traffic-calm the non-dual Woolwich Road between Anchor and Hope and the A102 flyover do not go far enough and nor are they explicit enough: it should be an access-only 20mph street with cycle lanes, wide pavements, landscaping features and convenient, safe crossings for pedestrians, especially at junctions and where CRAG proposes a new Charlton station exit at the western end of the down platform.</p> <p>Reducing the bypass barrier effect, encouraging walking and cycling. To the east of Anchor and Hope Lane, the dual-carriageway Woolwich Road - together with its continuation along Anchor and Hope Lane and Bugsby's Way - is a 20th century bypass concept. Everything possible should be done to impose a 21st century solution on it by reducing the barrier effect and improving the environment for the pedestrian and cyclist. The approach should apply equally to Anchor and Hope Lane and Bugsby's Way. All of the dual carriageways inside the Master Plan area should be treated as avenues or boulevards, not bypasses, and be developed as far as possible into civic assets.</p>

ID	Name	Organisation	Comments
			<p>Linking Village to River. Charlton Village - Charlton's heart - has been linked in a straight line to the river for at least a hundred years along Charlton Church Lane and Anchor and Hope Lane, a route that runs north-south almost exactly through the middle of Charlton. This traditional connection should be revived and strengthened, especially for pedestrians and cyclists.</p> <p>Anchor and Hope shared surface space. The Village - at the southern end of the revived Village/River route - should be complemented at the river by converting Anchor and Hope Lane (the cul-de-sac north of Bugsby's Way) into a landscaped shared-surface space for farmers' markets, fairs or other activities, integrated with the riverside walk and the Anchor and Hope pub.</p> <div data-bbox="584 469 1805 517" data-label="Image"> </div> <p>Charlton Station:</p> <p>transport hub, focal point. The intersection between the Woolwich Road and Anchor and Hope/Charlton Church Lanes axes marks Charlton's rail/bus transport hub. The intersection and any new development to its north should be designed to create a focal point and an architecturally considered space for the whole of Charlton, linking Charlton Riverside to Charlton Hillside.</p> <p>Charlton Station integrated interchange. The existing interchange - and if necessary, the associated intersection - should allow better integration of and access to rail and bus services, including a revived GWT link to CrossRail in Woolwich. Vehicular routing across the intersection should not inconvenience and endanger pedestrians and cyclist movements as it does at present.</p> <p>Charlton Station redevelopment. Given the massive increase in passenger numbers engendered by up to 5000 homes in Charlton Riverside, the station should be completely redeveloped (with an additional entry/exit at the western end of the down platform into Troughton/Rathmore Roads and Charlton Retail).</p> <p>Charlton Station: Woolwich Road/Anchor and Hope Lane junction. This should be re-designed to allow traffic from Charlton Church Lane to turn left into a limited-access Woolwich Road west and to move straight ahead into Anchor and Hope Lane. The existing Charlton Church Lane pinch points and bus entry point should be retained.</p> <p>A green corridor and link. Charlton's parks are one of its greatest assets and we therefore fully support the widening of Barrier Park and its integration with Maryon Wilson Park and the Green Chain. The essential link across the Woolwich Road should in the long term be in the form of a "green bridge" but in the shorter term should be something much better than a standard pedestrian crossing.</p>

ID	Name	Organisation	Comments
			<p>2. <i>The meaning of mixed use</i></p> <p>Linking living and working. Planning and design should ensure that a large spectrum of workplace opportunities are built into Charlton Riverside - building on its heritage of work - from small factory and business to artisanal workshop and creative studio. The presence of the workplaces should as far as possible be interlinked with living places, fostering quick or even immediate access between home and work, and encouraging the creation of work facilities and methods that are regarded as attractive civic assets rather than grotty liabilities.</p> <p>Linking living, studying, creating, working. The underpinning of a close association between work place and living place should be applied with equal vigour to the other core activities envisaged for</p>  <p>Charlton Riverside, as the Plan</p> <p>seems to suggest it does in the creative quarter, where creative, residential and study facilities are located together.</p> <p>3. <i>Relating to the river</i></p> <p>Riverside living, working and playing. River frontage at ground level and first floor levels should be designed to engender activities that ensure that the river front is "brought to life" (which on present evidence the Peninsula, for instance, completely fails to achieve: the O2 shuns one of the finest river frontages in London; the office developments turn their shoulders to the river; and the apartment blocks offer no ground level opportunities to draw in the public - an essential ingredient of any "animation"). Such activities would benefit critically from a focal point such as a local setback in the building line and the availability of space for businesses, including cafes, etc. In this connection we also suggest that the residential building line abutting the Barrier should open up towards the river.</p> <p>Public transport access to the river. A critical element for riverfront success will be a local bus route (such as the highly successful 380 serving Charlton Hillside) running parallel with and as close as possible to the river bank (bankside).</p> <p>The river playground. In addition to the additional "animation" inherent in the Plan's proposed marina, flights of steps should</p>

ID	Name	Organisation	Comments
			<p>make it possible to easily reach sandy/pebble areas of the river bed at low tide (as near the Greenwich Yacht Club).</p> <p>4. Charlton Riverside West</p> <p>A strategic shopping park. The fact that the Charlton Retail Park is strategically - and uniquely - located alongside a combination of numerous bus routes; a commuter rail station linked to both Greenwich and Blackheath/Lewisham and key locations eastwards; and London's only north-south, cross-river through traffic artery, calls for the Park's role and benefits in respect of Charlton, Greenwich and the larger region to be carefully teased out and built on, while also keeping an eye on frontage development and long-term intensification.</p> <p>Towards a one-stop retail experience. The immediate starting point should be a comprehensive, professionally conceived plan for sheltered footpaths and for landscaping and plant screening designed above all to benefit the convenience of the pedestrian.</p> <p>Charlton Industrial Park: mixed use. If any residential accommodation is considered for this area, it would be justified to create taller buildings, both to</p> <div data-bbox="584 735 1809 783" data-label="Image"> </div> <p>screen off the Angerstein Wharf and to relate to the generally higher buildings on the Peninsula on the other side of the Wharf.</p> <p>Charlton Industrial Park: heritage for the future. The Industrial Park is the focus of Charlton's industrial - or work place - role. The proximity of the river suggest types of activity that could continue Charlton's maritime history but whatever takes shape here, it should help to break the British habit of centuries: that the workplace is all too often something to regret and neglect. It should be regarded as - and designed to be - something that is part of the community.</p> <p>5. A residential heart</p> <p>The main residential area defined by the Master Plan does not have an identifiable focal point or heart. Given the relative isolation of the proposed riverside community, such a heart is more important than usual and relates implicitly to the avoidance of anything resembling a "housing estate" - i.e. it should be a place worthy of the community that will emerge and live there. In this connection it</p>

ID	Name	Organisation	Comments
			<p>will be essential to link this community to the local bankside bus service and might also have visual or other connections with the river, Barrier Park and along the line towards the inland church spire suggested by the Master Plan. Given the proposed housing density, a small clutch of shops would be an essential part of the focal point or heart.</p> <p>6. Streets to live in</p> <p>6.1 Small scale, sustainable, vital, varied. While the principle of a traditional street pattern with terraces and private gardens is a good one, it is important not to exclude other built forms in addition to those indicated in the Master Plan, whether private, public or housing association. While the intimacy of scale typical of greater Charlton is important to emulate, good design can achieve a variety of densities without losing that intimacy: given a general low density, other densities should be considered in appropriate locations where this would not compromise the generality. Such an approach would be in sharp contrast to development on the Peninsula, where the scale of even the Millennium Village is all too often oppressive (it could be argued that greater "village intimacy" could have been achieved there if densities had been more varied). However, while greater Charlton suggests a certain small-scale character, any future housing proposals for Charlton Riverside should not be expected to ape this simply because it may be traditional.</p> <p>Education for all. The area north-east of and immediately adjacent to the Anchor and Hope Lane! Woolwich Road intersection designated for educational purposes should be a priority for development as a secondary school urgently needed by the existing Charlton community. As part of the integration theme that should permeate the whole of the Charlton Riverside development for the purposes of sustainability and vitality, this educational hub should also be conceived of as a creative hub incorporating workplace and residential components, a kind of twin of the other creative hub on the eastern edge of Charlton Riverside.</p>
45	Lea Valley Foods	Lea Valley Foods	<p>We are totally against the plan for Charlton Riverside for the following reasons 1 the consultation period has been rushed through, too many people and businesses affected have not received notification of the changes the council proposes, it is almost like the council has kept the process secret why? 2 Charlton is historically an industrial area many local people are employed in the area, where are the jobs for these people coming from, please don't tell us that your desired smart industries will take up the shortfall. Jobs are vital for the local community not posh homes for city slickers, is it that you are envious of your neighbours in Canary Wharf? 3 With three thousand five hundred homes to be built in the area, where will the increased traffic flow caused by the new residents go. The Blackwall Tunnel approach is already bursting at the seams not to mention the increased pollution from exhaust fumes the extra vehicles will create. Think on. We feel that the council is dreaming of a eutopia that will come back and bite us, we already have youth unemployment at a scandalous level, who will give the young a chance of work, not smart at all Greenwich Council. We need a proper in depth debate on what happens to this area Alan Murrell</p>

ID	Name	Organisation	Comments
46	Mr Philip Binns	Greenwich Conservation Group	<p>As before, we thank you for inviting the Greenwich Conservation Group to comment on the current draft Masterplans. These we see as being an excellent initiative on the part of the Council and we thoroughly endorse the intention that, once approved as Supplementary Planning Documents (SPDs), they will ensure that, in the key areas of growth in the borough, a less ad-hoc approach to forming planning policy and determining planning applications will be adopted than has been the case hitherto. Charlton Riverside We recognise that the scope of the draft Masterplan for the Charlton Riverside area is perhaps the most ambitious of all the documents currently under consideration but we believe that it is essential not to consider the proposals in isolation but that they should be read in conjunction with the recommendations for the Peninsula West area. In terms of residential development, that study area has the potential to add between 1,000 (minimum) to 1,500 (maximum) further homes to the 13,650 new homes for which approvals have already been granted in either outline or reserved matters form on the Peninsula as a whole - Greenwich Millennium Village, Greenwich Peninsula Regeneration Ltd's masterplan, area, Enderby Wharf and Lovells Wharf. We believe that the figure of <i>around 13,000</i> on page 31 of the document is an under-estimation. The implications of the Charlton Riverside study are that between a further 3,000 to 5,000 new homes could be accommodated in the Charlton Garden City character area - a combined total of in excess of 17,000 (minimum) rising to just over 20,000 (maximum) new homes in both study areas - a small to medium sized town. We support many of the strategic objectives - not least that of transforming the image of this part of Charlton - but in speaking of development in the Charlton Riverside area creating the missing piece of the jigsaw connecting Greenwich Peninsula to Woolwich town centre, another essential link is being played down - the link with Charlton Village itself. The proposals helpfully suggest that the visual link at the eastern end of the study area where Maryon Wilson Park reads as an extension of the Westmoor Street gardens leading to Barrier Gardens should be strengthened. We suggest that a physical link be provided here by way of a pedestrian bridge over the A206. The divisive nature of Woolwich Road throughout the study area presents major problems in not helping the study area to merge with development to the south. It is imperative that safer and more pedestrian-friendly crossing points are provided - on the lines of the example set in Woolwich town centre which now offers a more appropriate link between the town and the Royal Arsenal. Another small way in which Charlton Riverside could be better linked to the remainder of Charlton might be if the study area were to be extended southwards to include the strip of land between Woolwich Road and the railway. A further way in which traffic issues on the A206 might be relieved albeit for a limited distance is if, as suggested in the draft document, Bugsby's Way west of Anchor and Hope Lane were to be extended eastwards across the centre of the study area. On the face of it, this might appear to be contradictory to creating a cohesive community but, on the Peninsula, West Parkside - a car and dedicated bus route - cuts a swathe between the north-eastern and south-western elements of the Greenwich Millennium Village without, apparently, causing any problems. We fully support the retention of the former London School Board in the Charlton Historic Quarter (currently used by Holborn College) and we are equally in favour of the retention of the five-storey Westmister Industrial Estate building in the same area. With regards to the residential proposals for the Charlton Garden City, we consider that the mix of typologies illustrated could result in an interesting residential area but only if the heights of the buildings are restricted to the range indicated on the drawings. This is not the place for tall <i>iconic</i> buildings and future pressures to build more intensively</p>

ID	Name	Organisation	Comments
			<p>because of Charlton Riverside's Opportunity Area designation must be resisted. The emphasis should be on providing a high proportion of units capable of accommodating families, in both the market sector offer and in the affordable housing sector. With this in mind, the need for family housing to be given private gardens is essential. We fail to understand why the layout is artificially sub-divided to take account of the long-distance view indicated in the photograph opposite page 51 of the document - a view of St John's Church at the Blackheath Standard, rather than of All Saints Church in Blackheath. Another concern relates to the fact each of the three Character Areas appears to be aimed at different, quite specific, uses. In order to create a more varied community, we suggest that pockets of residential use are introduced into Character Areas 1 and 3. We have, in our comments on the West Peninsula document, raised questions about educational provision at all levels across both the Greenwich Peninsula as a whole and this study area whose western boundary flanks the Greenwich Millennium Village. Although we recognise that this study area is to include a primary school and more specific secondary level provision such as a Post-16 facility and a technical college, can we be assured that the Council will address the need for a secondary school as such. On the question of land use, and particularly on development fronting the river, we leave it to others better qualified in these matters, other than to say that this long term proposal for this part of the borough can only succeed if it has input at the start from the Port of London Authority and the Environment Agency. These observations are in support of and supplement the comments made by the Charlton Society.</p>
47	Michael Hembrough		<p>SUMMARISED FROM HANDWRITTEN RESPONSE</p> <ul style="list-style-type: none"> - much of the area is occupied by small local businesses providing much needed employment - the location has been allocated as residential, even though there is the recently constructed Anchorage Point Business Park, which is occupied by Orange, Tavern Snacks and other thriving businesses - aware of soulless developments such as Millennium Village - the area dedicated for educational uses is already occupied by large recently built units, such as Selco and Self Store. Why are such radical proposals in the pipeline? - report prepared by the Mayor of London proposes New Charlton as an industrial area - this would appear to be at odds with your plans - would like the plan to be reconsidered and further consultation to be done on it

ID	Name	Organisation	Comments
48	Ashleigh Marsh		<p>I note with positivity the Charlton Riverside Action Group's response, particularly ideas for integrating mixed use development within the area. It is certainly the case that Charlton's industrial areas have grown 'organically' both to serve the needs of local people, and to make broader productive use of affordable space, particularly for small and medium scale industry. 'If it works, don't fix it' is a useful maxim here.</p> <p>The Cory Barge works is well known, but there are also other iconic firms here working long term to develop positive initiatives, such as the apprentice school attached to the Stone Foundry, and a number of food and other distribution companies like Lea Valley Foods, whose employees are mostly local people who have benefitted from skills training within a working framework requiring no state subsidy. This has to be a sign that their businesses are sustainable. Thinking about smart industry is a complex task, and requires proper study of our economic base, in conjunction with awareness of various newer fields of industry. (For example, ivp, who provide monitored security services, are certainly developing within this context.) The masterplan presents a picture of vacant industrial space across Greenwich, but implies that most of it is in Charlton. It isn't. I am concerned that Allies and Morrisons' priorities are not informed by a study of industry, but rather by an image of what is desirable to people like themselves. The masterplan reads like a glorified estate agents brochure. This cannot be sufficient in this post-property-boom era.</p> <p>Before embarking on a redevelopment plan, strategic objectives need to be identified. Making best use of riverside locations is a laudable aim, yet the nature of this best use needs to be widely informed. Not one of the dozens of local firms I have made contact with since the masterplan's publication had been consulted beforehand. This is somewhat irresponsible. I also read after the consultation last year into UDP options that there was an alternative strategy suggested that included more industry within a mixed context. The reason I was given by local representatives for this not being positively embraced was the fear of development plans prioritising industry being over-ruled in a wider strategic context. In fact the opposite seems to be a probability.</p> <p>The presence of so many small and medium scale food, furniture, stationery and other distribution firms is also a jewel in the crown for Charlton and for Greenwich. Sainsbury's seem to be taking all the public notice in this field, with their relatively huge number of lorry movements set to increase. Large supermarkets have the ear of local planners, where small businesses seem to have been ignored. This imbalance is a miserable inditement of the direction local politics seems to be taking, and must be redressed.</p> <p>Neither has a long-term strategic view been proposed so far to the high-value of recycling priorities in the next decades. One of the reasons why British industry is at a disadvantage to China, for example, is that clean production is not regulated to such an extent there, allowing rapid expansion into new technology without considering the environmental implications. Global warming and climate change, though controversial, must be urgent considerations. Non-ferrous metal prices are rapidly increasing however - of this there can be NO DOUBT. Wherever recycling of precious resources takes place it is vital for the future of the planet. Issues of</p>

ID	Name	Organisation	Comments
			<p>local pollution here are largely irrelevant - the impact of wasting recycling opportunities is global as well as national. The fact that there are a large number of scrap metal and car breaking firms in the area has been presented as a negative factor, and used to get local environmentalists to support the general redesignation of Charlton's industrial areas. This is a huge mis-representation. Where better to establish recycling than near London's arterial river with deep water working wharves that will enable a long-term plan to use clean river transport to move large amounts of material from a relatively central location to places where it can be re-processed on a large scale? The Cory environmental reprocessing plant is a short way down the river. It is obvious to anyone with an ounce of common sense that to sacrifice the potential to develop and expand sustainable river transport networks on small, medium and large scales to favour the out-dated dreams of residential property developers is deeply foolish short-termism. Can Greenwich seriously be proposing this? Council leaders, if they succeed in this nonsense, will go down in history as profiteers of destruction. I would be sorry for our great borough to have to live with such a legacy.</p>
49	Inde Gill		<p>First off, I generally think the plan for the riverside has the correct strategic objectives and development is required due to under utilization.</p> <p>Here are my points:</p> <ol style="list-style-type: none"> 1. The plan mentions how the western section of the woolwich road would require a screen to be built to shield the view from the swathes of car parking. - The woolwich road is highly populated by pedestrians, much more so than Bugsby Way, surely it would make more sense to make this road more attractive for the people accessing public transport and the retail parks? At the moment, the road is an eye sore and I think it would be a mistake to not incorporate this road into the contemporary Georgian pattern that is considered to pretty up the new development (which not be at the expense of the existing). 2. Woolwich road plan to downgrade the western part of this road is a good idea in principle but details are sorely lacking 3. Staying with the Woowich road, I should point out that the Zebra crossing is currently considered a death trap, motorist rarely stop. There has been comment about this on the Charlton Champion website. The plan shows the junction at the bottom of Victoria Way to be off-centre, which I think is a missed opportunity to align with the new development and provide a proper 4 way junction with lights 4. I don't think the current plan provides enough line of sight or new pedestrian access to the existing Charlton Rail station. This station is long over-due development as a hub that links into the O2 and beyond. 5. Could a tram system not be brought into place? Or at least better integration with rail as per above point. 6. Personally I think the aggregates site is a huge barrier that fails the strategic objective of linking the peninsular to Woolwich. I believe this site should be moved further out from Charlton and park space be set to replace the aggregates site to link

ID	Name	Organisation	Comments
			<p>with existing park in the peninsular, providing a new 'central park' to link peninsular and Charlton.</p> <ol style="list-style-type: none"> 7. Contrary to some other views from the local area, I am realistic that prestige residential developments on the waterfront are required to some extent to help fund the whole development scheme. I do however think that such developments needn't be flats but houses of 3/4 stories tall (already enough flats provided by peninsular and they are pretty ugly too) 8. A new swing park for children should be provided in either the 'central park' area I have mentioned (designed ;-) above or along the river-front, as there is not one along the length of the peninsular. 9. Redevelopment money should be set aside for Charlton village - this area is central to Charlton and the current plans to develop the riverside risk mothballing the whole village as development here is required as part of Charlton masterplan 10. Space for good quality restaurants in the new development is not mentioned - Charlton is lacking such facilities. <p>Many thanks for taking the time to read, please let me know if you have any questions.</p>
50	Ms Nicole Coates		<p>Thank you for the opportunity to comment on the Masterplan recently put forward for Charlton Riverside, which deals with the redevelopment of New Charlton. I have the following comments and concerns:</p> <ul style="list-style-type: none"> • Private use of the newly developed land. <p>The riverside at Charlton and public use of it is one of the greatest assets of the area, and it is vital that access to and ownership of the banks of the river remains in the public hands. I note that a recent riverside development in the borough - Lovells Wharf - has removed the public's access to the river. While I believe there are civil remedies that can be used to control a developer's use of the land it once built these are difficult to apply. I am generally concerned that handing over land to private developers leads to removal of access rights.</p> <p>More generally, many of the historic assets of the borough - Royal Herbert Hospital, Royal Military Academy, Royal Arsenal - have been sold to private developers for selling on as private dwellings. The river, and its industrial history, is another such asset and an alternative to private ownership would be welcomed.</p> <p>The plan document talks about Charlton as part of "a rapidly evolving part of London that is already changing for the better" - but it isn't clear 'changing for the better' means here. Perhaps what it means in the document is that we have more new housing, less industry, more shops. Perhaps it means we have more affluent people living here. Unpicking these sort of assumptions is important because it would enable us to see what the Council would see as the desired result for the area: is it to provide more jobs? is it to</p>

ID	Name	Organisation	Comments
			<p>provide more affordable housing? Is it to have the area be more aesthetically pleasing?</p> <ul style="list-style-type: none"> • Ability to deliver the changes suggested <p>I am concerned that much of the appeal of the newly developed area would depend upon:</p> <ol style="list-style-type: none"> 1. Transport links to Central London or to Canary Wharf. From the Woolwich Road there is currently not much transport provision, and certainly not enough to support 4000 new households. The plans make mention of new DLR extensions and the use of hopper buses and new Clipper piers - however these improvements would be outside the control of the planning department and yet the entire success of the scheme depends upon them. I imagine that the same applies to the 'downgraded' Woolwich road. 2. Retention of the 'creative industry' businesses that the report mentions. However I think there is an economic contradiction in place here: creative businesses have made their home in Woolwich/New Charlton not because of the fashionability of the area, but because of its converse. Rents are cheap in the area, and therefore businesses with very low margins (creative industries) can make their homes here. 'Improvement' of the area may lead to increased rents which may lead to driving the businesses away which the plan relies upon to give the area an interesting feel. <p>I note that you have already received many detailed responses with more precise concerns than the ones I list: I am a resident of the area but cannot claim any great expertise in city planning or the needs of the riverside industries. I should say that in general I was keener on the plan than my criticism makes clear, and I particularly welcome the suggestion of expanding the amount of parkland in the area. I would be pleased however if you could address for future exercises some concerns about how the Council is going about its aims and what it intends to achieve:</p> <ul style="list-style-type: none"> • Very small consultation period: the document was released mid-February and comments were initially expected by 6th March. Given that this is a plan that will effect the built environment in Charlton for decades or hundreds of years to come, providing this amount of time is to treat the opinions of businesses and residents of the area with contempt. • Ineffective notice given: Residents of the area were not leafleted or otherwise actively informed by the council. I came to learn of the plans via the Charlton Champion website. Nor could I find the plan documents from the council website without following links provided by Charlton Champion. Links given on the council website ended up at a dead end.

ID	Name	Organisation	Comments
			<ul style="list-style-type: none"> No official Council response to concerns at public meetings: many of the concerns that residents and business owners in the area had were not ones that could be addressed by the planners - transport availability, aims of the redevelopment, criteria for success of the development. The planners' framework for the plan produced must have come from the Council, and yet the council answered questions at the Valley meeting only if they touched upon the consultation process itself. There was no formal Council representation at the meeting at the Charlton Liberal Society - although I am very grateful to the individual Councillors who turned up to share their experience. <p>I have copied the planners at Allies and Morrison and the Charlton Riverside Action Group. I would like to express my thanks to both of them: Charlton Riverside for convening a public meeting to discuss these plans within the small time available, and Allies and Morrison (and in particular Antony Rifkin) for attending the meeting, and answering the questions of those present with patience and professionalism.</p>
51	Nick Raynsford	MP	<p>As with Woolwich, much of the report is similar to earlier studies of the Charlton Riverside, and the key themes (redevelopment of housing as well as retention of some employment uses, and improved access to the river) are familiar.</p> <p>The main difference appears to be that while earlier Masterplans were based on the presumption that there would be about 10,000 new homes in the Riverside area, this new Masterplan assumes only about 3,000- 5,000. However, it is still proposed that all the area between the Thames Barrier Park and Anchor and Hope lane should be in residential or educational use. Most of the homes should be three-bedroom or larger, in conventional terraces based on a "Georgian" street pattern.</p> <p>To the west, ambitious plans in the earlier studies to completely redevelop the retail sheds around Bugsby's Way, with retail frontages on to the road, are retained, as I understand that a new landowner is willing to consider a new form of retail development. The new Masterplan still recommends this long term, but only in the fifth of five phases of delivery of the Masterplan (for which no date is given).</p> <p>To the East of the Barrier Park, a new "Historic Quarter" is proposed, with some residential, cultural, business and "evening" uses. Although there is no proposal for a "Green Bridge" much emphasis is put on Thames Barrier Park, its improvement, and stronger connections to Maryon Wilson Park to the south.</p> <p>Concerns</p>

ID	Name	Organisation	Comments
			<p>1. The proposal for a new education campus proposed for the corner of Anchor and Hope Lane and Woolwich Road seems very vague — the new school site is midway between the new UTC to the east of here, and the new secondary school on the Peninsula to the west, and it seems unclear what kind of institution would fit this site: the report says a "secondary School" with leisure uses including a possible skatepark, but nothing more about what kind of secondary school and when it would be built.</p> <p>2. There is little or no suggestions in the report about how land would be assembled — unlike the Woolwich Masterplan which has a very long "delivery" section. I understand that there are at least eight major landowners in the area between Anchor and Hope Lane and the Thames Barrier: what effort has the council made to engage with them? While many of the employment uses in this area (e.g. Self-storage Units and scrap yards) are unwelcome and/or employ few people, there are many other businesses that employ local people, and are in economic sectors that should surely be encouraged, such as creative industries. The Masterplan does not explain clearly enough why these businesses should all have to relocate, and if so where the uses the Borough seeks to retain will relocate.</p> <p>3. There are some suggestions for improved transport such as having a revived Waterfront Transit route run eastwards along Bugsby's Way and then on a new alignment parallel with the Woolwich Road, and a taxi-rank at Woolwich Dockyard station. However, there is no mention of redevelopment of Charlton station, nor of improving access to the station. There is little mention of how Woolwich Road could be made less of a barrier between the existing communities and the new.</p> <p>4. The report rightly emphasises the importance of Thames Barrier Park and proposes its expansion, but says little about how its links to Maryon Park on the southern side of Woolwich Road can be improved. It does not examine the possibility of a Green Bridge, possibly over a sunken Woolwich road, to create a seamless park stretching all the way from Charlton Village to the river</p>
52	Ms Claire Craig	Planning Policy English Heritage - London Region	<p>1.1 As the Government's statutory adviser on the historic environment English Heritage is keen to ensure that the historic environment is fully taken into account at all stages and levels of the local planning process. English Heritage therefore welcomes the opportunity to comment on the four Supplementary Planning Documents (SPDs) currently out to consultation for the Royal Borough of Greenwich.</p> <p>1.2 The Royal Borough of Greenwich contains a rich and varied historic environment, including a range of historic structures, townscapes and landscapes, as well as evidential heritage value in historic and prehistoric archaeology both from the Thames foreshore and inland.</p> <p>1.3 Planning Policy Statement (PPS) 5: Planning for the Historic Environment (2010), policy HE</p>

ID	Name	Organisation	Comments
			<p>3.1 requires that, in their Local Development Frameworks Local Authorities set out a “positive, proactive strategy for the conservation of the historic environment in their area”. English Heritage supports the production of these SPDs which we hope will help guide development and change to support conservation of the historic environment.</p> <p>1.4 Overall we are pleased to see that the historic environment is addressed through these SPDs with relevant historic context sections in the background information sections. However, we have suggested some amendments below which we believe will strengthen them in regard of their compliance with PPS5.</p> <p>2. Building heights and tall buildings</p> <p>2.1 A significant omission in all of the SPDs is clear guidance on building heights and tall buildings. English Heritage/CABE's Guidance on Tall Buildings (2007) and the 2011 London Plan support a plan-led approach to tall buildings to ensure that they are located to maximise opportunities for good urban design and to avoid harm to heritage assets and their settings. While this approach has been established at a borough-wide level, where each of the SPD areas is identified as an area of tall buildings potential, there is an important role for the SPDs to refine this strategic designation through local masterplanning, and based on a more detailed understanding of the environmental characteristics of each area as required by PPS1. This is crucial for areas such as Woolwich where there is a concentration of heritage assets whose settings could be affected. A useful example to follow in this regard might be the London Borough of Wandsworth Site Allocations document.</p> <p>2.2 We suggest that explicit guidance is provided for each of the SPDs regarding building heights, and possible locations for tall buildings which takes into account any impacts on heritage assets, their settings, the townscape skyline and locally important views. This should be supported with clear urban design evidence, including an understanding of the local historic environment.</p> <p>2.3 In each document it would be useful for the policy review to acknowledge that each SPD area is identified as a location of tall buildings potential, which explains the rationale for providing a building heights strategy.</p> <p>3. Archaeology</p> <p>3.1 Each of the SPDs cover areas designated as Areas of High Archaeological Potential yet archaeology has not been addressed as an issue in any of the documents. The banks of the</p>

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			<p>Thames are particularly rich in archaeological findings due to the intensity of historic activity there, while Woolwich and Eltham Town Centres and the entire Peninsula have a long history of settlement and activity which could yield archaeological remains.</p> <p>3.2 Reflecting the Borough's unusually high archaeological potential we understand that it intends to adopt its draft document London Borough of Greenwich: Areas of High Archaeological Potential Appraisal, containing updated boundaries, character descriptions for each area, and short potential aspects for research. This is clearly a useful document for the purposes of strategic planning and decision making, and should be drawn on in each of the SPDs.</p> <p>3.3 We therefore recommend that Areas of High Archaeological Potential designations be identified in each of the SPDs, as set out in the Appraisal (together with a cross-reference to it), and that their sensitivity to development impacts be highlighted, drawing the character descriptions provided in the Appraisal. In addition, we would suggest that, where development proposals are concerned, the SPDs reinforce and encourage assessment of archaeological potential, reflecting the approach outlined in PPS5 and reinforced by the English Heritage London Archaeology Charter. If they fall within a designated area, applications should contain a Heritage Assessment to cover above and below-ground assets and sites outside of the Areas of High Archaeological Potential of 0.4ha or more in area should also be subject to the same process. If archaeology is a minor consideration then a statement in the Design and Access Statement should show that it has at least been considered.</p> <p>4. Consistency with PPS5 terminology</p> <p>4.1 In each document, to avoid ambiguity it is important to ensure consistency with PPS5 when formulating policies to addressing designated heritage assets, ie to seek to conserve their historic significance. For example, the Woolwich Town Centre SPD (page 100) should address designated heritage assets, and cover all asset types, including archaeology.</p> <p>Borough-wide policy framework</p> <p>5.1 For clarity it would be useful to set out, in the introduction to each SPD, the Core Strategy policies which each SPD supplements.</p> <p>6. Design and heritage considerations</p>

ID	Name	Organisation	Comments
			<p>6.1 We welcome policies to promote public realm enhancements and high quality design. In doing so it is important to explicitly promote contextually-sensitive design, for example, in terms of materials, heights, typologies, heights, street furniture. This is particularly important where there are higher concentrations of heritage assets, such as in Woolwich Town Centre. English Heritage has provided a range of Guidance documents to show how this can be achieved, notably English Heritage/CABE's Building in Context (2001) and our suite of documents entitled Understanding Place (2010).</p> <p>10. Charlton Riverside SPD 10.1 For compliance with PPS5 a comprehensive approach should be taken to identifying heritage assets, ensuring that all types of heritage are identified, and for ease of reference, shown on a plan. It is not currently clear that this approach has been followed.</p>
53	Mr David Hammond	Planning and Advocacy Adviser Natural England, London Region	<p>Thank you for your correspondence dated 31 January 2012, requesting Natural England's views and comments on the above consultation documents. Your letter has been passed to me as a member of the Land Use Services Team for response.</p> <p>Natural England is the Government agency that works to conserve and enhance biodiversity and landscapes, promote access to the natural environment, and contribute to the way natural resources are managed so that they can be enjoyed now and by future generations.</p> <p>Natural England is supportive of initiatives to enhance and improve access to green spaces as well as provision of new green open space provision, especially in areas of deficiency for access to nature. Improvements to and realignment of the Thames Path National Trail, where appropriate are also welcomed and supported.</p> <p>The Masterplan proposals seek to encourage and provide new residential and economic opportunities within the selected areas. As part of sustainable development the Council should also seek to provide sufficient leisure and amenity resources also, new parks and green spaces should be considered, along with improvements and enhancements to existing sites.</p> <p>Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. This should be made more explicit in the Town Centre Masterplans and policies included to ensure the borough's green infrastructure is designed to deliver multiple</p>

ID	Name	Organisation	Comments
			<p>functions.</p> <p>The council should consider the role of the natural environment as part of a sustainable developmental approach, together with energy efficiencies. As discussed above, incorporating the natural environment into the built environment can significantly contribute to climate change adaptation including through flood storage, reducing rainwater runoff and ameliorating the urban heat island effect. We recommend that the role the natural environment can play in climate change adaptation is drawn out further in the Masterplans, and policies included reflecting this.</p> <p>The potential for new and additional residential provision within the selected Town Centres/Areas can lead to increased pressure on existing resources, including leisure and amenity spaces Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system:</p> <ul style="list-style-type: none"> • No person should live more than 300 metres from their nearest area of natural green-space; • There should be at least one accessible 20 hectare site within 2 kilometres; • There should be one accessible 100 hectares site within 5 kilometres; • There should be one accessible 500 hectares site within 10 kilometres. <p>This is recommended as a starting point for consideration by local authorities and</p> <p>can be used to assist with the identification of local targets and standards. Whilst</p> <p>this may be more difficult for some urban areas/authorities than other, Natural</p> <p>England would encourage local authorities to identify the most appropriate policy</p> <p>and response applicable to their Borough.</p>

ID	Name	Organisation	Comments
			<p>Green Grid and Blue Ribbon</p> <p>The use of the existing natural signature of a borough can be used to help deliver Council objectives. Natural signature refers to the underlying landscape of an area, which if drawn out, can make a direct and powerful contribution to 'sense of place' and local distinctiveness. An example of this can be seen in the Wandle Valley Regional Park which has a natural signature of water meadows echoing the meandering course of the river, backed by bands of wet woodlands.</p> <p>Natural England has recently produced the London Landscape Framework which gives further guidance on the 'natural signatures'. We recommend that you refer to this document and ensure that it is reflected in the appropriate section of the Masterplans. The London Landscape Framework can be found at:</p> <p>http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx</p> <p>The Council should also look at the fragmentation of open spaces and the linking of them back to paths and other sites. This would also be in line with the councils aspiration to promote and encourage pedestrian and cycling opportunities for the Town Centres.</p> <p>Below are general comments that may be of use for potential developments and developers in the areas, and are offered as advice.</p> <p>Local wildlife sites</p> <p>If proposal sites are on or adjacent to local wildlife site, e.g. Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) the county ecologist and/or local Wildlife Trust should be contacted.</p> <p>Protected species</p> <p>If representations from other parties highlight the possible presence, or the Council is aware of a protected or Biodiversity Action Plan (BAP) species on the site, the Council should request survey information from the applicant before determining the application. Paragraph 98 and 99 of ODPM Circular 06/2005 and Paragraph 16 of Planning Policy Statement 9 [1] provide information on BAP and protected species and their consideration in the planning system.</p>

ID	Name	Organisation	Comments
			<p>We would draw the Council's attention to our protected species standing advice, which provides guidance on when protected species may be impacted by a proposal. The advice can be found at:</p> <p>http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/standingadvice/default.aspx</p> <p>Biodiversity enhancements</p> <p>Application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as those mentioned above. The Council should consider securing measures to enhance the biodiversity of sites from the applicant, if it is minded to grant permission for applications. This is in accordance with Paragraph 14 of PPS9. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.</p>
54	Mr Peter Luck		<p>I thought that, late as it is, I would put on record some of the comments I made at the public presentation of the masterplan. Before proceeding I note that others have pointed out discrepancies between the masterplan and the London Plan and that there is now an adverse response from the PLA.</p> <p>1. The existing industrial area is shown as both reduced and thoroughly re-ordered. This implies a great deal of disruption to existing companies and risks the closure or emigration of at least some of them.</p> <p>If intending to nurture the employment base, this seems irresponsible.</p> <p>2. The concept of the 'smart wharf', as explained at the presentation, requires all the functions of the</p>

ID	Name	Organisation	Comments
			<p>wharf other than discharging or loading of a ship or lighters to be relocated to remote sites. The justification given was that this would remove nuisance from residential areas. This argument seems less than persuasive. The materials discharged (here sea aggregates) are required primarily for the London construction industry which, even in a time of recession, is hungry for aggregate; bringing it into London , moving it back out to the periphery and then in again, by truck, makes no sense.</p> <p>3. It is also a matter of concern that the range of employments on offer in the area would be reduced by the policies and spatial allocations referred to here. Specifically, the amount of work of a manual nature, skilled or unskilled, would diminish. This ignores two things: first, the continuing need for such work to be done and to contribute to the functioning of a metropolis from within it, and secondly the need to accommodate the wide variety of people within a metropolis not all of whom will readily accept non-manual work.</p> <p>4. On a different front, I note that the words ‘animate the river frontage’ appear next to a line which, taken at face value, indicates a riverside path disrupting the Cory barge works. At this point the river frontage is already fairly animated and a strict adherence to the water’s edge is quite un-</p>

ID	Name	Organisation	Comments
			<p>necessary for a satisfactory Thames path. A little variety rather than the boredom of the pedestrian motorway on the east side of the peninsula is needed – as well as respect and co-operation for waterside industry.</p> <p>5. Regarding the housing areas proposed, although the thought given to house types is welcome, the question of balance with industry remains. The best protection of housing from noisy industry may be a belt of quiet industry</p> <p>Someone in a local blog wrote that it appeared AMUP had designed for people like themselves. Sadly, for all their undoubted ability and probable good intent, I have to agree: cumulatively, it seems the proposals would both put the continued productive use of the river at risk and contribute to the polarisation of metropolitan society by displacing industry and industrial workers to unspecified locations, and that is not what responsible planning is about.</p>
55	Miss Amy Davies		<p>My name is Amy Davies and I am a resident of Woolwich Road.</p> <p>Whilst agreeing overall with the ideas presented in the master plan for Charlton it would like to make the following comments.</p> <p>1. There is no mention of how Charlton Riverside relates to the rest of Charlton and it does not seem to view it as part of a single community. It would be usefull to try to remove barriers between Charlton Riverside and Charlton Hillside, and create a modern ambiance in the former that echoes the traditional one of the latter. The Master Plan would benefit from extending it slightly and making the railway the southern boundary of Charlton Riverside.</p> <p>2. The main residential quarter does not have its own orientating centre or focus and a more mixed use of the land as opposed to rigid zoning of areas may be more beneficial.</p> <p>3. More should be done to calm the traffic on the Woolwich Road. It would be good if it became an access-only road on Woolwich Road West.</p>

ID	Name	Organisation	Comments
			<p>The Master Plan's proposals to traffic-calm the non-dual Woolwich Road between Anchor and Hope and the A102 flyover do not go far enough: it should be an access-only 20mph street with cycle lanes, wide pavements, landscaping features and convenient, safe crossings for pedestrians, especially at junctions.</p> <p>4. Charlton Station redevelopment. Given the massive increase in passenger numbers engendered by up to 5000 homes in Charlton Riverside, the station should be completely redeveloped (with an additional entry/exit at the western end of the down platform into Troughton/Rathmore Roads and Charlton Retail).</p>

Woolwich Town Centre

ID	Full Name	Organisation	Comments
1	Mrs Victoria Wilkinson		<p>I think the improvements are on the whole very positive but mostly long term. I would like to know what the waterfront transit route is exactly. With all this money being spent on Woolwich and Charlton there seems to be no improvements on public transport links between Greenwich town centre and Woolwich, so the residents of West Greenwich cannot really benefit from the Crossrail connection or the DLR link to City airport. As our local taxes are involved, we would like to think that some benefits would also come to West Greenwich. If some of the buildings are going to be anything like as shoddy and cheap as the Greenwich town centre new boat ticket/visitor centre/fast food buildings then I am definitely not in favour. the latter we find totally shocking as a welcome to Greenwich Royal Borough/ World Heritage Site. What was Greenwich Coucil planning committee thinking of?</p>
2	Mr Carl Graham		<p>Online & by post</p> <p>I am deeply concerned by your proposals and will briefly outline my concerns here. I cannot go into too much detail as your time frame for consultation (ending 9 March 2012) is not sufficient for this purpose.</p> <p>I am interested in the development as I part own the property known as Wellesley House, Duke of Wellington Avenue, SE18 6SS. I bought the property with my business partner, in 2005, following a Greenwich Council compulsory purchase order on our previous offices in Beresford Street. We had an extensive search and much wasted time to try to find suitable office accommodation, before deciding to commission the building of our own premises in the Royal Arsenal, promising to be a purpose built office in a prestigious location. It is a little galling to be faced with more disruption and a more difficult search for new premises.</p>

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			<p>I do support attempts by Greenwich Council to improve infrastructure and property stock in the borough. Unfortunately, there appears to be no consideration for the business community. The area most affecting me, being the "site 3 - Arsenal Way" development is an area of professional offices/commercial/light industrial property which has been developed successfully and sold/rented to the business community. The many businesses in the area provide a commercial hub to the borough with significant benefits in terms of local employment. One wonders where the residents in the "mixed use residential led development" are going to work? Do they all travel into Central London on Crossrail? Surely a mixed used development combining residential and commercial property is more preferable both to residents and business - and that's exactly what we now have on the Royal Arsenal Estate.</p> <p>Comparable professional office accommodation with good transport links, in the borough, is very scarce. Following implementation of your master plan, the situation will be even worse and many employers will be forced to consider re-locating to a more business friendly environment, doubtless with significant re-location costs for the businesses and compensation demands of the council.</p> <p>I urge you to rethink your plans and leave the already developed eastern end of the Royal Arsenal to continue to thrive.</p>
3	Brian Wilson	Managing Director F.I.T-Shirts Ltd	<p>Re The I O Centre and surrounding area</p> <p>Royal Arsenal</p> <p>I have recently been made aware of the above proposal and would immediately like to make the following comments / objections.</p> <p>As a Company we were previously located at 152 Greenwich High Road but following a proposed redevelopment of the site we were forced to move. Our landlord at the time was Greenwich Council. Some 6 years later this same site is closed and derelict with no sign of development of any kind.</p> <p>Our move here represented a secure and modern base for the Company and its staff, almost all of whom live in the local area. By buying the property we had hoped and expected that we would be able to stay here in a modern unit without problem for decades.</p> <p>As a manufacturer employing up to 40 staff we were originally welcomed and given considerable encouragement to move here, rather than outside the Borough.</p> <p>We now find ourselves in a very uncertain position and feel that little if any consideration has been given to the existing occupants of</p>

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			<p>the site. I believe there are in the region of 100 different businesses operating in the immediate area. Whilst I understand that there is a need to improve the local infrastructure and even build more homes etc. I am equally sure these homes will be occupied by people needing to work.</p> <p>For some very considerable time Woolwich has seen a decline in employment opportunities and with unemployment being at such a high rate I would ask you to think again. Certainly I would like to know how many jobs would be lost if this proposal were to go ahead and indeed how many long term jobs would be created and in what areas of business.</p> <p>In summary I would support many aspects of the proposal but must object to the proposal unless further consideration is given to the mix of business and housing and indeed the existing businesses on site. It would almost seem that the Council are happy to see the area become a dormitory for workers in Canary Wharf and other areas outside the Borough with little or no term investment in long term jobs in the area.</p>
4	Peter Nottage	Deputy Senior Responsible Manager HMRC	<p>I am the HM Revenue & Customs (HMRC) Deputy Senior Responsible Manager based at Riverside Hse- West, Woolwich High Street SE18 6DN, where HMRC currently sit as tenants (Ground & Floors 9-13th)</p> <p>I have just had chance to skim over the very detailed ambition statement, contained within the link, below but I would be very grateful if you would be able to directly advise me of any other/precise plans that have been adopted to re-develop our location in the near future.</p> <p>Greenwich Council - Masterplans</p> <p>I understand our lease runs until 31/12/22 but obviously your “master plan” initiative has raised some questions over how our location maybe affected in the short/long term.</p> <p>Are you able to provide me with any more information at this point in time, that is relevant to our location, so that I may keep my staff informed.</p> <p>Please also can you keep me in your circulation/email loop and kindly include me in any future news that may affect us in Woolwich</p>

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			town centre. This is so that I can keep my staff informed and also ensure that my Accommodation Dept/partners are also kept up to spec with any changes that are in the pipeline.
5	Michelle Golding		<p>Please could I submit this as response to the Woolwich Master plan.</p> <p>1 - As part of the 'animation' of the Riverside, could there be a way to create more areas to sit and actually view the river from. This might involve raising areas to create the sitting spaces.</p> <p>2 - The Market Square is used by cars when the market is not on. It is really dangerous because there are no road markings. Can we do more to prevent the parking of cars here.</p> <p>3 - I welcome the removal of barriers to pedestrian movement, particularly on the High street where it is pedestrians only.</p> <p>Site 3 - New Primary School. This is a great idea. If the school could also incorporate a nursery or after school provision it would benefit the working families that live on the Arsenal. People would be happy to pay for the additional services.</p> <p>Site 1 - The Waterfront Leisure Centre - The plans are to resite this. Can I suggest including top notch Spa facilities, sauna, steam rooms, hydrotherapy, relaxation room. This could increase the revenue of the leisure centre. GLL have done similar things in other boroughs.</p> <p>There are no other health/gym facilities that offer this in the area.</p> <p>4 - Site 11 - Gala Bingo. I fully support this site becoming a Cinema.</p> <p>This would bring people to the centre in the evenings instead of the deserted streets we currently have.</p>
6	Mr Patrick Blake	Highways Agency	<p>Thank you for your email on 31 January 2012 inviting the Highways Agency (HA) to comment on the Masterplan Consultations for Woolwich Town Centre, Eltham Town Centre, Charlton Riverside and Greenwich Peninsula West. The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. We have reviewed the Masterplans and do not have any comment at this time.</p>
7	Fatima Blanchard		<p>What a wonderful news for our borough of Greenwich.</p> <p>- Transforming Charlton Riverside</p>

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			<ul style="list-style-type: none"> - Revitalising Eltham Town Centre - Developing the west side of Greenwich - Developing Woolwich <p>How wonderful would be to extend somerevitalising to Plumstead Town Centre. Seems that we residents are left with no options but to go to others area for our shopping and entertainment(coffee shops/restaurants).</p> <p>I think we residents of Plumstead would be please to support our own area andsome improvement would create more jobs.</p> <p>I hope one day I can read in the paper that my area will the next on your list.</p>
8	Mrs Ann Galloway		<p>I like the idea of having a direct route from Hare Street down to the river, but I feel strongly that this area should not just be retail and residential. Be a little bit more imaginative. Have the Woolwich Ferry / Tunnel site developed as an entertainment and dining attraction. A pool could be incorporated into this as it is a special place to swim with the river running alongside you. Have an outdoor area and you have Woolwich Beach to bring people to the area and give it a unique selling point.</p>
9	Mr Richard Lewis	Managing Director Limelight Entertainment Limited	<p>Herein is the joint view of Limelight Property Limited a property owner and Limelight Entertainments Limited a business within the io centre Woolwich which is identified as “site three” within the Woolwich Town Centre Draft Masterplan SPD 2012.</p> <p>While supportive of the redevelopment of Woolwich and the Royal Arsenal we have been shocked to find a property which was only built three years ago, be marked up for total demolition and redevelopment. The io Centre which makes up the majority of area 3 is a very modern business area, marked up on page 17 as “Future potential development land” and on page 21 “New mixed use residential neighbourhood”.</p> <p>When we purchased and fitted out the unit two years ago we took on the property on the understanding of buying into a new development which will form part of Woolwich into the future. The costs of the move to our current premises, which form part of our company accounts for 2010, are in excess of £80,000. As a small business this investment was made on the basis of corporate stability and organisational efficiency it would bring to our operational base. The notion that these sort of relocation costs can be absorbed arbitrarily as the councils create, populate and, within three years, subsequently revises its planning development is nothing</p>

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			<p>sort of naive in the extreme.</p> <p>Our head office employs 8 people, four of whom live within the borough, but all of whom live locally (within 15 minutes). Additionally the company spends hundreds of thousands of pounds with other local businesses as well as employing up to 60 part-time workers throughout the year.</p> <p>We are deeply concerned at the extent of due diligence the council undertook in both the original planning decision that allowed our premises to be built in the first place, as well as the planning behind the current proposals. Should the council continue with plans for demolition of “site three” we will appoint council and seek a judicial review.</p> <p>Central government, particularly in recessionary times, has made much of the important role that small businesses have in both the wider economic picture, as well as the impact on jobs, individuals and families. It is hard to fathom the rationale behind disrupting local businesses and demolishing recently built office properties.</p> <p>We wish to most forcefully express our objections to the current proposals and will continue this objection through any legal means.</p> <p>Yours sincerely,</p> <p>Richard Lewis</p> <p>Managing Director</p> <p>Limelight Entertainments Limited</p> <p>Limelight Property Limited</p>

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10	Mrs Alison Grant		<p>I agree that aspects of the proposed residential and retail Masterplan for the development of Woolwich will benefit the town. However, business development is under-represented by this Plan. Demolition of the brand new commercial facilities on the Arsenal is both hugely inefficient and destructive to small & mid scale businesses which the Council claims to be keen to promote.</p> <p>Commercially, we employ as many as 40 professional theatre personnel on each project. We also pride ourselves in our London base. The arrival of Crossrail to the Arsenal should be beneficial to local business too, rather than its downfall.</p> <p>On a personal note, I sought employment with this company partly because it could offer me the chance to extend my working life beyond statutory retirement age. I would like to swell the voices of any small local businesses which object to the 3rd phase of the Masterplan for Woolwich.</p>
11	Miss Caroline Rodley		<p>I strongly disagree with one of the plans for the Royal Arsenal development as it affects me personally. The office that I work in was a new build in the Royal Arsenal and we moved here 2.5 years ago, this was very costly but we moved here because the office/warehouse was perfect for our business. Since moving here we have had a lot of building work done to the interior of the office, creating meetings rooms, a new kitchen and a toilet. We also purchased a fork lift truck and had racking installed into the warehouse. All of this cost our company a lot of money but we did it at the time with the view we would be here long into the future.</p> <p>We were excited about Woolwich being re-vamped and seeing the cross rail development in progress, but to now see we could have our office and warehouse demolished for more housing and a school is very unfair. The location of this office is perfect for myself (I drive to work in 10 mins) and for all my colleagues.</p> <p>Some companies here may not be able to afford to move premises and could go bust, employees may not be able to travel to a new location etc and these factors will only increase the unemployment rates which are at such a high level in the UK. I have spent the last 8 years working for this company (I am only 26) and do not like the fact my future employment is being threatened by external influences rather than a company or personal decision.</p>
12	Paul Mitchell	Building Manager	On behalf of Greenwich Leisure Ltd the owners of the Grade 2 listed building Middlegate House I wish to raise our objections to the proposed Woolwich Town Center masterplan Site 3 - Arsenal Way which appears to remove our building along with the listed wall running along Plumstead Road and the listed middle gates and replace with residential housing. This would also mean the

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			loss/redeployment of 100 jobs from the local area.
13	Miss Kaylie Byrom		<p>I am very disappointed and let down by these plans. Although the redevelopment of Woolwich is essential, leaving the small and medium business behind will be detrimental. We spend many lunch hours in Woolwich town centre adding to the local economy and if we moved will no longer be able to do this. I live a short distance from Woolwich but I cannot drive and my office is easy to get to by public transport. Should we have to move i may lose my job as a result of the relocation, this will not help with the Greenwich (and countries) unemployment statistics. Greenwich needs to support local business as it has a larger knock on effect than has been considered.</p> <p>In addition redeveloping an area that is less than 3years old is up surd and makes no sense. All the companies have moved here with a view to staying and building their business. The developments indicate there is already a large amount of new housing and 'community' being created so where is the need to upheave and create unnecessary work and expense for company's already doing well to survive in this climate.</p>
14	Mrs Jane Dempsey		I am amazed that businesses who have been encouraged to move into the area and take up units within the Royal Arsenal, may well be forcibly moved out and their premises demolished after a matter of a few short years. Surely this development was planned and built precisely to encourage businesses into the area? The last unit in this particular block has only just been occupied, and the company, like ours, has spent time and a great deal of money to create the right facilities for their business. All of the units here provide local jobs and are helping with the economy of the area. For this reason I want to register my objection to the planned change to this area to a residential led community.
15	Mr Richard Buchanan	Newsletter Editor Woolwich & District Antiquarian Society	<p>Powis/Hare Street Conservation Area. Does it, or could it, include the Callis Yard Stables and Stable Master's House?</p> <p>Spray Street Quarter. The row of buildings along the Plumstead Road opposite Crossrail should be kept; as should the buildings at the bottom of Woolwich New Road - one of which was the site of the Pioneer Bookshop, an important left wing centre, influential in the development of the Labour movement (as important in its way as the Alexander Macleod RACS building).</p>
16	Mr Paul Trotter	General Manager Limelight Entertainment	As the General Manager of a local small business situated in the designated "area 3" within the plan I am aghast to see the council's plan to demolish what is a modern, vibrant and more importantly thriving business community. Further to this I personally bought a

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		s Limited	<p>house on the basis of having good access to the business I work for. If the business is forced to move I fear I will lose my job.</p> <p>There is also the question of how incredibly wasteful both in terms of money and the environment it is to build and demolish a site so quickly.</p> <p>What does Woolwich want to be? Does it want to be a vibrant place where people are able to both live and work or is it a satellite of the city?</p>
17	Roy Nagalingum		<p>Thank you so much for your letter about your exhibitions in the borough. I would like to may my personal views known to you if I may. Herbert Road in Plumstead which is a well known in area in Greenwich, a big shopping area and a local councillor lives here, a large community lives in this area.</p> <p>I have written to the Councillor who lives here, why we have not had any 'Royal flags' displayed in this area. We never have anything. We used to have a local council office, known as 'changes in the common' and they used to organise quite a lot of activities, but since their disappearance we have had virtually nothing. Can I suggest if I may if you could extend this exhibition at this site if you can. I know it is too late to alter your leaflet. But for future, it would be a good idea to include Herbert Road residents. There are disabled, elderly who does not like to travel for particularly when it is dark. Besides, transport is not that good on Herbert Road. Actually there is only one bus that goes all the way until the end of that road to the QEH. They are not efficient. Lot of cancellation and the public are not made aware. I mentioned it to people as I go about as I am a community group leader in that area. I am encouraging them, to go these exhibitions during the day and get the bus home before dark.</p> <p>I will try to go to one or two myself during the day. Have you got some large posters which could be displayed on Herbert Road. I have access to a locked noticeboard on that road for the community. Perhaps you could send me a few or at least collect them from you.</p>
18	Ms Lucy Owen	Planning Officer Port of London Authority	<p>Thank you for consulting the PLA on the Woolwich Town Centre masterplan. I have now had the opportunity to examine the submitted documentation and would like to make the following comments:</p> <p>The PIA considers that the production of this document is premature given that the final version Of the Core Strategy will not be available until Summer 2012, The Core Strategy will then be the subject of an Examination in Public and the Inspector will publish his/her findings. The approach set out in the Core Strategy is a departure from that in the current UDP arid Mere is no certainly that it will be accepted by the Inspector. As highlighted in Chapter 8 The Policy Context of the SPD, "SPD's provide further detail on the</p>

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			<p>implementation of particular policies and proposals contained in the Development Plan. SPD's must relate to policies or proposals in the Development Plan and they may not be used to set out new policies nor to allocate or re-designate land for specific purposes. As such the PLA would assert that the production of a masterplan document which accords with a draft Core Strategy runs the risk of producing a document which will require substantial changes as the Core Strategy progresses, could potentially confuse members of the public and other consultees and will result in consultation overload.</p> <p>Reference is made to the Woolwich Ferry and its long term future. The PLA is working with TfL and others concerning the potential future options which will need to be thoroughly assessed in terms of navigation, river regime and the environment.</p> <p>Reference is also made to the commuter ferry being a valuable service but with a limited timetable. The PLA would be happy to work where relevant with the Council, TfL and others concerning any potential improvements to the facility.</p>
19	Jason Brownless	Managing Director Digital Nerve Centre	<p>RE: Royal Arsenal Redevelopment</p> <p>I write to inform you that I am disgusted and outraged by a fax that I have recently gained knowledge of through a third party regarding the 'Royal Arsenal Redevelopment'.</p> <p>We have been informed of your project via a client of our Company, who is also on the Royal Arsenal Business Park. Your complete lack of communication is just preposterous and leaves me quite perplexed at how we are being treated.</p> <p>Some 6 years ago Digital Nerve Centre were looking to relocate our offices. At that time we were in rented premises and wished to purchase our own building. This was obviously a huge commitment on our behalf and a huge amount of time was spent looking for offices that would best suit our needs. Our unit at the Royal Arsenal was purchased knowing that it was a little bigger than required, however knowing we were here for longevity and were going to grow into it.</p> <p>We were sold on The Royal Arsenal for a number of reasons, some of which I have highlighted for your perusal below</p> <ul style="list-style-type: none"> • Good transport links by road and train in and out of London • The promise of the DLR and Cross Link • Development of Adequate parking and space • Regular Security Patrol for peace of mind

ID	Full Name	Organisation	Comments
			<ul style="list-style-type: none"> • 999 year lease • A vibrant modern estate; creating the right impressions • Part of the new London Gateway • London Development sold the building • London Development are now wanting to knock it down <p>We were encouraged by The London Development Agency to employ local people, and to invest in the area. As an established Company, we felt proud to be part of the evolution of Woolwich and feel that we have contributed to its development.</p> <p>If this is how you treat local investors, I ask myself why we would want to seek another building in this area should we be forced out. We would most certainly move out of the area should we leave our current premises.</p> <p>Our local employees would find it difficult to commute to a location out of the area therefore potentially would have to leave their long term employment with our Company. The implications of having to recruit new staff and develop them forward would put our Company back when we have worked long and hard to build our future. This recently found information is giving additional pressure at a time of worldwide economic meltdown and is completely comprehensible. We are left feeling totally bewildered and angry at your proposals. We feel that this is a complete betrayal of trust as investors.</p> <p>Do not underestimate the fact that we will defend and fight our case to stay vigorously, against your ridiculous campaign to rid out businesses that have bought a wealth of prosperity and employment to this local area.</p>
20	Mr Nigel Hughes TFW PRINTERS	Director T F W Printers	<p>It was good to listen to what people had to say regarding the outline plans for the “Woolwich Masterplans”, however we felt the questions we as a company would have liked to ask, where not representative of everyone but more personal,</p> <p>So if I may ask them now and not expecting immediate answers but responses by return email would be appreciated.</p> <p>Regarding our units 27, 28 and 29,</p> <p>We purchased the Units in 2005, with the view to build our business’s and enjoy what was looking to become an exciting development, with the area developing at some speed the potential value of the properties would rise accordingly, and our</p>

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			<p>investment strategy with new equipment is working well</p> <p>Then the new plans to re-generate the very same industrial site we are on, to residential housing has knocked the wind out of our sales.</p> <p>1) Can we assume that having registered with the “Greenwich Council Consult system” we will be informed of any further consultations, or decisions.</p> <p>2) At what point would you expect to inform the owners of the units, that they would have to vacate, bearing in mind the investment levels already taken place, it is paramount to what or where the next investment for our business’s would be.</p> <p>3) Is there a statutory guideline for situations such as this, or would a compensation package be drawn and submitted to allow owners to make an informed decision as to when they would like to depart as apposed to be left till the last minute</p> <p>4) As you can appreciate to move premises is hard enough but to move to a different area can have a big impact on turnover and peoples lives.</p>
21	Ms Rose Freeman	The Theatres Trust	<p>The Theatres Trust is The National Advisory Public Body for Theatres. The Theatres Trust Act 1976 states that ‘<i>The Theatres Trust exists to promote the better protection of theatres.</i> It currently delivers statutory planning advice on theatre buildings and theatre use through the Town & Country Planning (General Development Procedure) (England) Order 2010 (DMPO), Articles 16 & 17, Schedule 5, para.(w) that requires the Trust to be consulted by local authorities on planning applications which include ‘<i>development involving any land on which there is a theatre .</i>’</p> <p>We only have a few comments to make concerning future entertainment provision in these four areas.</p> <p><i>Woolwich</i> : Site 11 - we support the suggestion that the former Gala Bingo site should be refurbished to its original use as a cinema which would be used as an anchor for the town’s evening economy. We would be grateful to be consulted on future plans for the refurbishment.</p>
22	Miss Sarah		<p>I think it's disgusting that after only a couple of years of the buildings within the Royal Arsenal being built you are now talking about demolishing them, what a waste of money. Companies have spent a lot of money moving in to those buildings and getting them to</p>

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	Deere		how they want it and now you want to just knock it down. These companies were encouraged to move into the area and take up units within the Royal Arsenal, surely this development was planned and built precisely to encourage businesses into the area? All of the units provide local jobs and are helping with the economy of the area. For this reason I want to register my objection to plans. Please I just ask before you make any rational decisions that you think of the consequences it may have on others.
23	Mr Martin Ronan	Director Limelight	As a Director of a company who re-located to The io Centre in Woolwich Arsenal just over two years ago I have to register my strong objection to the proposed plans for Woolwich Town Centre. We are a growing company employing a number of local people and the prospect of re-locating again, with all of the financial implications that brings, is a major concern in the current economic climate. I would ask that the business community in the area are consulted on this matter before any firm decisions are taken.
24	MR RYDER ASCOTT		<p><i>I write as the owner of Units 46 - 48 Armstrong Road SE18 6RS, to confirm my concerns over the current master plans with regard to the site 3 redevelopment at the Arsenal.</i></p> <p><i>Firstly, there has been no consultation on this matter at any time with the owners and tenants of the I.O. Centre, and, like others, we were only alerted to these proposals by a neighbour.</i></p> <p><i>Marnic plc (now Univar) purchased this triple shed during 2005, at a time when Greenwich council were promoting this development as the future of the Arsenal, bringing jobs and revenues to a rundown area.</i></p> <p><i>We were actively encouraged by your planning officers to further enhance the property, at huge expense, with high standard luxury offices, housed behind extended walls of glass to uplift the quality and aesthetics of the development.</i></p> <p><i>Do you believe it to be reasonable that, after buying a 999 year lease, we would be told 7 years later that Greenwich Council would do a complete U-turn, deciding they had made a mistake, and that we should be bulldozed in 2022?</i></p> <p><i>Your new plan may be a better use of this valuable space, but this should have been ventured before wasting all our time, endeavours and massive investment.</i></p> <p><i>It would seem that the planners are cynically dismissing our successful adoption of these units, creating jobs and attracting further interest in the Arsenal, both commercial and residential, now that our purpose has been served.</i></p> <p><i>Although it will be of little interest to your department, apart from the grave loss of jobs, I personally will be greatly disrupted in that the exit route at my retirement, in the near future, was to sell these units to create my pension. Should these plans be adopted, the buildings will be</i></p>

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			<p><i>blighted in local searches, subsequently making them unsaleable for 10 years, or longer, or perhaps you will do another U-turn after another 7 years, saying you have abandoned the idea due to cost?</i></p> <p><i>This situation is completely untenable, and displays the contempt that you hold your former partners in.</i></p>
25		Powis Street Estates (No.3) Ltd	<p>My client supports the vision and objectives behind the Woolwich Town Centre Masterplan. It is important to Woolwich town centre's existing and future status as a Metropolitan Centre, within London, that it undergoes regeneration and expansion. Whilst the regeneration objectives for existing sites within the town centre come through the document, the expansion of the town centre boundary to existing outlying or fringe areas would remove the constraint to development created by the current boundary to the town centre. This would bring a clear message that the Masterplan envisages the current town centre to physically expand outwards, which would bring additional sites into the Masterplan exercise.</p> <p>The Masterplan should be improved as follows:</p> <p>The Land Use Principles state that the majority of core retail should be located between the retail anchor store and the eastern end of Powis Street. This could be interpreted as relating only to Powis Street (because the anchor store is at the western end of Powis Street). This provides no room for expanding the core retail offer in the town centre on other sites. With the threat of the existing competition and customer draw away from Woolwich town centre to Charlton Riverside, as identified by the Charlton Riverside Masterplan, the town centre should be boosted by additional retail floor space to address this imbalance and to enhance its attraction.</p> <p>The promotion of leisure and community uses that help to drive change in the area implies that these uses should be part of any mixed use proposal. Is this what the Council is seeking?</p> <p>In respect of Site 11, the Gala Bingo building and Mortgramit Square, it is not necessary to join these sites, and they should be treated as separate sites. One site does not rely on the other in development terms. It is not clear in the Masterplan as to why "additional space is needed to deliver the development proposed" when the Masterplan proposes to refurbish the Gala Building only. In addition, not only would residential be acceptable in this location but also retail and other commercial uses.</p>

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			<p>In general, the Masterplan could be clearer and more visionary in its approach. The idea of Quarters is mentioned in the main document with reference to Bathway Quarter and once in the Sites section in relation to Spray Street Quarter. The idea that certain areas within the town centre could develop or promote a particular characteristic might assist in providing an identity to parts of the town centre, contributing to the overall make up of the whole. Quarters are referred to in the Masterplan but not really developed as a concept.</p> <p>One or more of the Quarters could promote for example, inspired joint public/private spaces where restaurants and similar uses would spill out over a pedestrianised area creating a thriving urban street scape. To help create this, for example, the Masterplan should promote areas where the build up of a higher percentage of restaurant type or cultural type uses would be appropriate to help foster this type of daytime and evening activity and street scene.</p> <p>The Masterplan pays little regard to the creation of employment opportunities, neither is there reference to encouraging new office uses or higher employment generating commercial uses within the town centre. This element of the Masterplan would be promoting the town centre as 'the' destination for investment and employment creation as part of the drive towards Metropolitan Centre status. It also sends out a longer term signal to encourage and prioritise investment in Woolwich town centre rather than in other less strategic locations such as Charlton Riverside.</p> <p>The Masterplan should link to the Masterplan for Charlton Riverside.</p> <p>Finally, as a point of correction, Site 17 inaccurately refers to the Bakery Building when it should be referring to the former Co-Op building in Powis Street. The accompanying illustration also wrongly identifies the Headquarters building as the Bakery Building.</p> <p>In addition, with reference to the Bathway Quarter, including the Island Site, the Masterplan should add that redevelopment of existing buildings or retention of their facades only should also be considered, in respect of buildings that are not statutory listed. Some of these buildings were built in the 1960s and 1970s and are of no particular design or architectural merit. The important aspect is to ensure the sites within the Quarter including the Island Site contribute towards the regeneration of the town centre.</p>
26	Ms Kate Dell		<p>Masterplan I do not think so! Tearing down buildings that are only a few years old, that have had the necessary building works to become a perfect office/warehouse for their particular business, forcing companies to relocate and consequently running the risk of huge debt for the companies on this site and unemployment. Is this really necessary?!</p>

ID	Full Name	Organisation	Comments
27	Ms Judith Cooke	Planning Liaison Officer Environment Agency	<p>Thank you for consulting the Environment Agency on the draft Woolwich Town Centre Masterplan Supplementary Planning Document dated February 2012.</p> <p>The key issues and opportunities for the Environment Agency in this location are as follows:</p> <ul style="list-style-type: none"> § flood risk management and improvement of flood defences; § ecological enhancement of the waterfront; § sustainable drainage; § remediation of contaminated land; § improvement of walking/cycling links; § provision of green open space. <p>We have set out our detailed comments and provided further sources of information in the following sections appended to this letter:</p> <p>Section 1 – Detailed comments</p> <p>Section 2 – Sources of information</p>

ID	Full Name	Organisation	Comments
			<p>We hope our response is constructive and clear. Please contact me if you have any questions or if you would like a meeting to discuss our response or any other issues.</p> <p>Yours sincerely</p> <p>Miss Judith Cooke</p> <p>Planning Liaison Officer</p> <p>Direct dial 020 7091 4002</p> <p>Direct fax 020 7091 4090</p> <p>Direct e-mail judith.cooke@environment-agency.gov.uk</p> <div style="border: 1px solid black; padding: 10px; margin-top: 20px;"> <p>Section I – Detailed comments</p> </div> <p>Flood risk management and improvement of flood defences</p> <p>Flooding from all sources should be considered including the contents of the Greenwich SFRA and future SWMP. The choice of development type should be informed by the sequential approach placing development types in the different flood risk areas to minimise overall flood risk vulnerability. Building design should also be informed by flood risk.</p> <p>Although the major part of the town centre is located in Flood Zones I and 2 there is risk of flooding given the proximity to the River Thames. Any breach in the defences would result in rapid inundation of the area and the surrounding. We are pleased to note</p>

ID	Full Name	Organisation	Comments
			<p>that the masterplan recognises the residual risk involved and development must be made safe in case of flooding.</p> <p>We would welcome a greater emphasis on space between the Thames and built development for a wider public open space / the Thames Path and for opportunities to set back the flood defences and to provide better operational access to the flood defences and to improve the defences in line with TE2100 / climate change raising.</p> <p>There may be opportunities to soften the visual and access impacts of the tidal defences including the proposed crest height raising to address climate change through the design of landscaping works. These issues can be difficult on some individual sites and better addressed on a wider scale.</p> <p>New development within this zone should address the above points and seek to reduce the vulnerability of the defences. Where defences require repair or upgrading this should form part of any riparian development.</p> <p>While appraising the Woolwich Town Centre Masterplan, it should be noted that it is not within the normal remit of the Environment Agency to comment on or approve the adequacy of flood emergency and evacuation procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during an emergency will be limited to delivering flood warnings to occupants/users. Planning Policy Statement 25 (Paragraph G12) and its associated Practice Guide (Paragraphs 7.25 to 7.33) best describe the roles and responsibilities for flood warning and evacuation.</p> <p>We are currently developing this work to develop a riverside strategy for the tidal Thames appraising the environmental constraints and opportunities within each Policy Unit. We would welcome the opportunity to work with you to integrate best practice ideas for realising flood risk management solutions and ecological enhancements through new development.</p> <p>We would like to work in partnership with your Authority, third party developers and riparian land owners to improve condition of flood defences when sites come forward for development.</p> <p>Ecological enhancement of the waterfront</p> <p>We support the outlined proposals. Guidelines should be included to ensure that the river edge is appropriately treated through any redevelopment, providing an adequate buffer zone (ideally 16m from the top of the river wall) as well as river edge enhancements, as</p>

ID	Full Name	Organisation	Comments
			<p>outlined in our Estuary Edges guidance.</p> <p>Would like to see more opportunities for retreated flood defences and creation of intertidal habitat similar to area on east of peninsula near the dome.</p> <p>Sustainable drainage</p> <p>It is important that SUDS are considered on a master planning scale if better opportunities are not to be missed. For example, new strategic surface water sewers to the Thames may be needed to drain the inland sites. Green roofs should be used for their biodiversity benefits and to reduce the volume of water that will be discharged to the combined sewers saving on CO2.</p> <p>The Flood and Water Management Act 2010 will introduce far-reaching requirements for SUDS on future construction work. When the commencement order takes effect, applicable construction works will not start until drainage systems have been approved by 'Approving Bodies' in line with national standards for SUDS. The existing right to connect surface water drainage systems to public sewers (under Section 106 of the 1991 Water Industry Act) will be restricted to those approved under the new regime, i.e. appropriate SUDS.</p> <p>Approving Bodies (the local planning authorities) will be obliged to adopt all approved drainage systems except those on single properties and public highways. Road drainage will be adopted by Highways Authorities, as now, but design, construction and maintenance must be in line with the new national standards. This will therefore impact on how development in the town will be implemented.</p> <p>The Act applies to any construction work that creates a building or other structure, including "anything that covers land (such as a patio or other surface)", that will affect the ability of land to absorb rainwater. In other words all new buildings, roads and other paving, whatever the size, type or scale of the project, will be affected – as well as alterations that have drainage implications</p> <p>The Flood and Water Management Act 2010 requires that all new sewers/lateral drains are adopted by the Water Companies. Existing private drains and sewers were adopted from 1 Oct 2011. Developments with new sewers are now required to enter into an adoption agreement under the Water Industry Act 1991.</p>

ID	Full Name	Organisation	Comments
			<p>Developers are expected to produce detailed drawings, manhole schedules and sections together with drainage calculations to the Unified Build Standard issued by DEFRA. This standard is expected to be incorporated into the forthcoming Sewers for Adoption 7th Edition which will also cover pumping stations.</p> <p>Sewers should include adequate clearance from adjacent buildings to allow for future access for maintenance and structural integrity of the sewer. Careful routing of the drainage network would minimise the requirements for Easements and Building-Over agreements.</p> <p>Remediation of contaminated land</p> <p>Large areas of the Town Centre, particularly at the Royal Arsenal and the planned Crossrail station, have been or are undergoing development. From a land contamination and groundwater protection perspective, there has been close involvement between the EA, Royal Borough of Greenwich and developers to ensure development addresses issues of historic contamination through appropriate investigation and remediation.</p> <p>This Masterplan presents an opportunity for development to complement the work done in terms of remediation in areas adjacent to the current redevelopment sites. We agree that a more detailed plan is needed for the Arsenal Way development. This will need to take account of information on ground conditions obtained from Crossrail and Royal Arsenal West redevelopments. For example isolated areas of ground contamination from metals, solvents and hydrocarbons have been found in adjacent areas and any similar issues will need addressing at Arsenal Way.</p> <p>Useful information on ground conditions for the Wellington Street and Bathway Quarter locations would be available by reference to those found at the Love Lane redevelopment, which future developers should be made aware of. The former Gala Bingo and Mortgramit sites are also close to a site subjected to ground investigations in the past, and any redevelopment here should be carried out with full awareness of any remediation activities carried out.</p> <p>We are pleased to see that groundwater flooding risks for some parts of the Masterplan area have been acknowledged in the document. This may place some constraints on the drainage designs for new developments and will need to be considered carefully with reference to ground investigation information.</p> <p>There is an improved Code of Practice to regulate the reuse of excavated materials. This Code will facilitate easier cleaning up and</p>

ID	Full Name	Organisation	Comments
			<p>re use of excavated materials in soil treatment centres or soil hospitals, which can economically serve a number of small development sites in an area and reduce the need and cost of sending off site to landfill or treatment. We are promoting the consideration of potential hub and cluster sites in other Opportunity Areas. Please refer to the link below - <i>Development Industry Code of Practice - Definition of Waste</i></p> <p>http://www.claire.co.uk/index.php?option=com_phocadownload&view=file&id=212:initiatives&Itemid=82</p> <p>Improvement of walking/cycling links</p> <p>Woolwich Town Centre Masterplan offers an opportunity to improve and promote cycling and walking by:</p> <ul style="list-style-type: none"> • Promoting the Green Chain Network as a cycling and walking route. There is need to seek and secure improvements and new links to the network as part of new development and regeneration. • Exploring ways to reduce pedestrian and cycle congestion • Promoting walking across the town centre with new signposting e.g. with distance and average times to key destinations. For example during suspension of underground services pedestrians are often unaware of walking routes and short distances between destinations. • Securing “first class” facilities and storage to encourage cycling <p>Provision of green open space</p> <p>We welcome improvements made to General Gordon Square providing an important open space at the eastern end of Powis Street and a key link to the riverside, through the Royal Arsenal. There is need to ensure that the river edge is appropriately treated through any redevelopment, providing an adequate buffer zone (ideally 16m from the top of the river wall) and river edge enhancements, as outlined in our Estuary Edge guidance.</p> <div> <p>Section 2 – Sources of information</p> </div>

ID	Full Name	Organisation	Comments
			<p>We collect key evidence for information and influencing plans. This information covers a wide range of environmental issues and opportunities and can be used to influence the policies and implementation of local plans.</p> <div> Thames Catchment Flood Management Plan & TE2100 Plan <p>Provides an overview of the flood risk in the Thames catchment and sets out our preferred plan for sustainable flood risk management over the next 50 to 100 years.</p> <p>http://publications.environment-agency.gov.uk/pdf/GETH1209BOYL-e-e.pdf</p> <p>http://www.environment-agency.gov.uk/homeandleisure/floods/125045.aspx</p> </div> <div> Sustainable construction <p>http://www.environment-agency.gov.uk/business/sectors/136252.aspx</p> </div> <div> Environment Agency State of Environment Report for Greenwich <p>Highlights environmental facts and data for Greenwich (November 2011)</p> <p>http://www.environment-agency.gov.uk/static/documents/Research/Greenwich_2011.pdf</p> </div>

ID	Full Name	Organisation	Comments		
			<div>Environment Agency Adapting to Climate Change strategy http://publications.environment-agency.gov.uk/pdf/GEHO0709BQBW-e-e.pdf</div> <div>Environment Agency – Creating a better place Strategy http://publications.environment-agency.gov.uk/pdf/GEHO1109BQXG-e-e.pdf</div> <div>Other useful strategies</div> <div>Drain London Project Drain London will aim to manage and reduce surface water flood risk in London by improving knowledge of the surface water drainage system and identifying areas at greatest risk of flooding. http://www.london.gov.uk/drain-london</div>		
28	Berkeley Homes	Senior Planner Berkeley Homes (Urban	Subject / Site / Page:	Topic:	Berkeley Homes Comments:
					Berkeley Homes supports the vision in general and

ID	Full Name	Organisation	Comments		
		Developments) Ltd	<div>The Vision (page 2)</div>		<p>the following aspirations in particular:</p> <ul style="list-style-type: none"> • Delivery of Crossrail; • expand Woolwich into a metropolitan centre; • see the Royal Arsenal continue to be developed; and • create activity along the river and improve connections between it and the rest of the town.
			<div>Objectives (page 14)</div>		<p>Berkeley Homes supports this section of the document.</p>
			<div>Town Centre Masterplan – Land Use Principles (page 16)</div>	<div>Retail</div> <div>Residential</div>	<p>Berkeley Homes supports retail uses within the town centre's 'core' and the intention that the majority of retail should be located between the western and eastern end of Powis Street.</p> <p>Berkeley Homes supports the 'ongoing implementation of the royal Arsenal and The Warren proposals'.</p> <p>Berkeley Homes support the general aspiration for a primary school, subject to due consideration being given to the financial arrangements so as not</p>

ID	Full Name	Organisation	Comments		
				Leisure, culture and community (aspiration for a primary school and increased employment opportunities to the east of the Crossrail Station)	to negatively affect development viability on the remainder of the site.
			Woolwich masterplan framework plan (page 20)	Existing Royal Arsenal site identified as 'Under construction / planning permission. Land to the east of Arsenal Way identified as a 'New mixed use residential neighbourhood'.	Berkeley Homes supports this but would point out that the Crossrail intervention shaft in the proposed Royal Arsenal gardens is no longer required. Berkeley Homes supports this aspiration.
			Site I – Glass Yard (page 24)	Council wishes to see the riverside leisure centre located to a more central location in the town centre, with the site developed for a new mixed use development.	Berkeley Homes supports the aspiration to relocate the Leisure Centre to a more central location within the town centre. This would allow the existing site to become available for further residential-led mixed use development on a prominent river front site which residents could

ID	Full Name	Organisation	Comments		
					benefit from in amenity terms.
					Berkeley Homes would suggest that an appropriate location for a new Leisure Centre could be the existing covered market, as this is close to existing services and amenities as well as existing and future residential development.
			Site 2 – Crossrail Berkeley Homes land (page 26)	The Council supports the provision of Crossrail and intensification of uses around the site.	Berkeley Homes supports the site objectives.
			Site 3 – Arsenal Way Berkeley Homes land	The Council supports the development of this site for mixed use residential-led development, a new primary school and other associated uses.	Berkeley Homes support the general aspiration for a primary school subject to due consideration being given to the financial arrangements so as not to negatively affect development viability on the remainder of the site.
			Site 13 – Warren Masterplan Berkeley Homes land	The Council identifies this area as having permission for 3,711 units and other uses.	Berkeley Homes wishes to inform the Council that the site area shown in the document is incorrect in relation to the planning permission being referred to.
			Delivery (page 50)	Point 3 sets out the following: ‘Enter into discussion with Berkeley Homes, Firepower and Thames Clippers to improve the attractiveness of the	Berkeley Homes would welcome a discussion with the Council regarding this aspiration.

ID	Full Name	Organisation	Comments						
			<table><tr><td></td><td>Royal Arsenal site to visitors. Encourage more restaurants, bars and café uses and consider options for a new visitor attraction. (For example, the children's experience centre, Eureka, in Halifax are looking for a London base.).</td><td></td></tr><tr><td>Delivery (Page 51)</td><td>The Council refers to The Woolwich regeneration Board having a close working relationship with landowners and businesses in the area.</td><td>Berkeley Homes supports then need for a closer working relationship and wishes to be included in this process.</td></tr></table>		Royal Arsenal site to visitors. Encourage more restaurants, bars and café uses and consider options for a new visitor attraction. (For example, the children's experience centre, Eureka, in Halifax are looking for a London base.).		Delivery (Page 51)	The Council refers to The Woolwich regeneration Board having a close working relationship with landowners and businesses in the area.	Berkeley Homes supports then need for a closer working relationship and wishes to be included in this process.
	Royal Arsenal site to visitors. Encourage more restaurants, bars and café uses and consider options for a new visitor attraction. (For example, the children's experience centre, Eureka, in Halifax are looking for a London base.).								
Delivery (Page 51)	The Council refers to The Woolwich regeneration Board having a close working relationship with landowners and businesses in the area.	Berkeley Homes supports then need for a closer working relationship and wishes to be included in this process.							
29	Spencer Drury	Councillor - Greenwich Council	<p>Overall comments</p> <p>Looking at the strategy for Woolwich it appears to us that there are some mixed messages. It appears to us that the analysis in the document about Woolwich generally (and some of the major problems, such as poor connectivity, barriers caused by Beresford Street, the 'collar' of poor quality housing estates, lots of historic buildings and history to take advantage of) is all correct. However when you look at the detail it's seems a bit unambitious and people will be waiting a very long time for many of the improvements and we wonder whether the proposals as they stand give any coherence to the town. If you are going to undertake a 'Quarter' approach of having lots of different Quarters is a good one - but it appears that at the moment we're plonking tower blocks and Tescos a bit randomly and not thinking about how it all fits together. E.g. if we have Europe's biggest Tesco behind the Woolwich Centre, is this really going to attract other food retailers onto Powis Street?</p> <p>Essentially the strategy up until 2017 is based on the development of existing permissions, at the Tesco site, the tower block over the DLR, the Travelodge and finishing off General Gordon Square - the issue is whether this will help in giving coherence to Woolwich and the town centre - and may take some time to come to fruition.</p> <p>We would argue that some of the smaller sites may be able to be developed more quickly, particularly on Powis Street, and encourage some high profile retailers to locate - things seemed to be going fairly quickly a few years ago with Starbucks opening up, Stead & Simpson, but it's stalling badly with lots of 'independent' clothes shops, and other poor quality retailers. In our view the quickest way</p>						

ID	Full Name	Organisation	Comments
			<p>to get a positive high street is well known national retailers - it's not going to be a place for lots of independent shops.</p> <p>Our fear is we have a situation, looking at the plans, where we have a strip of new flats right along the river front, because they're the easiest thing to deliver and the rest falls behind very quickly.</p> <p>We support the idea of turning Powis Street/Bathway Quarter into a Conservation Area - this should give Woolwich a bit more pride about its history and preserve an area which has a lot of characterful buildings. Plus it would work well with the newly created Woolwich Theatre and would offer something a bit different, like 'the lanes' in Brighton. However it's not coming in until 2018 - I think we need to be more ambitious about what this area could offer, and I think we need to be careful that there is careful restoration of the buildings and not trying to pack flats in between the old bathhouse, police station, town hall etc. - the other point that doesn't help this is that the improvements at Calderwood Street aren't expected until 2022 - which again doesn't give you confidence about joined up thinking - if this is going to be an arty area with lots of creatives, having a huge 60s car park doesn't really help.</p> <p>I think there is also a concern about the phrase 'intensification' particularly around the Crossrail station and to a lesser degree the Spray Street site. The area around that Crossrail station with the Dial Arch pub, is quite a tranquil area and I worry that with the 'intensification' of these sites, it will detract from the most historical buildings on the Arsenal, Vanburghs house is only metres away and I fear the Dial Arch pub loses some of its appeal.</p> <p>I think more broadly on the Warren Masterplan - we have already expressed our concerns, at Planning Board and in successive election campaigns that it potentially ruins the very high quality restoration on the Arsenal. The other fear is that the development of Arsenal Way may 'squeeze' the refurbished Royal Arsenal part and devalue you it as an asset to the town.</p> <p>I see the rationale for moving the Waterfront Leisure Centre from Glass Yard as with all the development going on - it does become somewhat trapped - however I'd be interested to know the level of investment that has already gone into this - and I wonder where it would be located - the SPD is also silent on any timescales for this move.</p> <p>Other things to be positive about:</p> <ul style="list-style-type: none"> • A new Primary School for the Royal Arsenal development - sensible - but again shouldn't we really be thinking about a secondary school for Woolwich before 2027?

ID	Full Name	Organisation	Comments
			<ul style="list-style-type: none"> • SprayStreet needs some urgent attention it is an important Gateway/transitionsite into Woolwich from the riverfront and looks awful at the moment • new Travelodge at coop site is positive and brings a very historical building back into a sustainable use • Extension of Hare Street- good idea as it breaks some of the barriers created by Beresford Street • Positive that the bingo hall is seen as a key site for a cinema - which is much needed in Woolwich, although building lots of flats on the site as well may overdevelop it • More public realm improvements are welcome - but again we've got to think about how all the different parts connect with each other. • We need to make sure we keep on their back about the building heights strategy that they've promised to produce - so we don't get tower blocks plonked everywhere randomly <p>Perhaps the biggest omission is that there is simply no strategy for estate redevelopment in Woolwich to improve the more suburban ring around the town centre, which the strategy acknowledges is a big problem but sadly, offers no solutions. This needs to be tackled head on or else we will end up with the prospect of a divided community with lots of flashy flats on the waterfront and 60s council flats sitting behind them with little prospect of change. It talks about the redevelopment of Beresford Street - good idea - but there are huge estates as you go up to Woolwich Dockyard that needs to be tackled, similarly there are huge estates around the Woolwich Arsenal Train Station and on the road up to the Barracks. The only reason some will buy a flat on the water front like at Mast Quay - with a huge monolithic council estate just across the road is for buy to let - and this leads to my wider fear that if Woolwich becomes the centre for lots of small 1 and 2 bed flats, mixed with lots of existing estates with poor reputations, we create a Thamesmead style situation - when actually we could see some real positive change.</p> <p>We are surprised that the only reference to the barracks was wholly negative in that it created 'barriers'. In addition we feel there needs to be an open discussion about where the development gain money will go.</p> <p>We remain sceptical of the role set out for the Woolwich Regeneration Board as it does not currently appear to be active.</p> <p>On the whole it's very bitty, lacks details and simply states that the answer is 'more mixed development with retail flats and offices etc., but it doesn't really explain how it all fits together in a coherent town centre, which we think should be focused on getting Powis Street back functioning as a proper high street.</p>
30	Christ Faith	Christ Faith	We are instructed by Christ Faith Tabernacle International (CFTI) to make representations on the above document. In particular,

ID	Full Name	Organisation	Comments
	Tabernacle Church	Tabernacle Church	<p>our representations relate to the former Gala Bingo Hall at Powis Street, Woolwich.</p> <p>By way of background, CFTI purchased the former Gala Bingo Hall in August 2011 from the Gala Group who ceased using the property as a bingo hall at that point. CFTI purchased the property with the intention of using it as a place of worship along with ancillary and other community uses to meet the needs of its expanding congregation many of whom (circa 1,400 people) live within the London Borough of Greenwich. CFTI's existing premises are at New Cross and will continue operate serving the needs of residents in Lewisham and Southwark.</p> <p>Further to its aspirations to use the premises as a place of worship, a planning application for its change of use to D1 purposes was submitted to Greenwich Council in October 2011. That application remains with the Council awaiting determination. It has been the subject of discussions with the Council Officers, both before submission and subsequently. In addition, an application for Listed Building consent was also submitted and has now been approved. Finally, urgent works of maintenance and repair have been undertaken to the property by CFTI over the past months. All of these works have been carried out following discussions and agreement with the Council's Design and Conservation Officers as well as English Heritage.</p> <p>The proposed use of the property would provide a place of worship and community facilities that will be used and valued by local Greenwich residents; the vast majority of who would be from the BME community. It is a use that is wholly consistent with the Greenwich UDP and in particular Policies SC1, SC3 and C1. In particular Policy C1 indicates:-</p> <p>The Council will support proposals for new or extended or enhanced community facilities particularly where they meet the needs of disadvantaged groups</p> <p>It is against this background and CFTI's proposed use of the property that these representations are made. Our specific comments by reference to the document's sections are as follows:-</p> <p>03 Objectives - Page 14</p> <p>Our client supports the fifth principal objective identified for Woolwich town centre at page 14. That objective is:-</p> <p>„Identify areas for leisure, community and cultural uses within the town centre.</p> <p>Our client's proposed use of the property as a place of worship is a community use and would be wholly consistent with this objective. Its use would attract a significant number of people and it is right and proper that it be located within a town centre such as this with its excellent public transport accessibility. Indeed, Government guidance (PPS4) supports such uses locating in town centres.</p> <p>04 Town Centre Masterplan ;V Page 16</p> <p>Our client agrees with the final sentence of the paragraph dealing with Leisure, Culture and Community Uses. It is correct that towards the western end of Powis Street, where the former Gala Bingo Hall is located, leisure and community uses start to predominate. Our client's proposed use, being a community use, would be consistent with that objective.</p> <p>Page 18</p> <p>Our client agrees with the objectives identified under the Design and Heritage paragraphs and in particular the importance of</p>

ID	Full Name	Organisation	Comments
			<p>protecting the town centre's important heritage. The former Gala Bingo Hall, which is Grade II* Listed, is an important part of that heritage. Finding a beneficial use of the property (such as our client's proposed use) is the best way of protecting the building's historic character and ensuring public access to the building. Indeed, our client has already invested significant sums of money in undertaking immediate repairs to the building. In the absence of an appropriate use the building will inevitably deteriorate.</p> <p>Woolwich Masterplan Framework Plan ;V Page 20</p> <p>We note on the Masterplan Framework Plan the former Gala Bingo Hall is identified first as a building for refurbishment/renovation and secondly as appropriate for leisure use. Our client agrees that the building requires refurbishment and renovation and its proposals will secure this. Our client, however, objects to the identification of the building as solely appropriate for leisure use. A more appropriate allocation would be for leisure or community uses. As we go on to explain there is, in our opinion, no demand for the property for use for leisure purposes and therefore we believe that it is appropriate to allocate it for both leisure and community uses thereby affording the maximum potential for its future use and therein ensuring its long-term protection.</p> <p>Site 11 ;V Former Gala Bingo Site and Mortgramit Square ;V Page 38</p> <p>Our client agrees that the former Gala Bingo site acts as a gateway to the town centre, however, objects in the strongest terms to the site's allocation solely for ;¥cinema or other suitable leisure/entertainment use;. As indicated above, any allocation should also include the potential for community use including a place of worship. This would reflect our client's current planning application and the realities of the situation where there is not, in our opinion, a need or demand for the retention of the property for cinema or leisure use. In particular we would make the following points:-</p> <p>„X Use of the property as a cinema has failed in the past. There is no current demand for its use for cinema purposes.</p> <p>„X Similarly, use of the property as a bingo hall has recently failed. We are not aware of other leisure uses which either have a demand for the property or which would be suitable for it, given its important historic features and form.</p> <p>„X Gala's Bingo's wish to vacate the property and therein the availability of the building was well known in the property market for approximately two years before the Bingo Hall closed. During that time no cinema or other leisure uses came forward to take on the building. The only interest in the building was from three churches including our client's interest.</p> <p>„X The internal layout of the building renders it unsuitable for most leisure uses. In particular its sloping floor, balcony, stage and historic features all mean that many modern leisure uses (for example, bowling, bingo, nightclub, casino, etc.) would either be unsuitable for the building or would require unacceptable changes to its historic fabric.</p> <p>„X The draft Masterplan's allocation of the site as suitable for leisure use does not appear to be based on any analysis of the facts of the building's suitability for modern leisure uses or the need (or more correctly lack of need) for such uses in this type of building. Allocating the building for a use for which there is no demand will merely render it redundant and lead to it standing vacant. This is wholly undesirable given the building's exceptional historic quality.</p>

ID	Full Name	Organisation	Comments
			<p>In contrast to the lack of need or demand for a leisure use of the building there is a clear and unambiguous demand for the building's use for community purposes. This is evidenced by our client's current proposals and by the UDP itself which acknowledges that accessibility to places of worship is an issue faced by the BME community. In the context of our client's proposed use it is worth noting that:-</p> <p>„X In addition to regular church services within the building our client also proposes to run various community support services and programmes from the building. These will include:-</p> <ul style="list-style-type: none"> - A resource centre for older people providing companionship, support, welfare and benefits advice. - A law centre providing free legal advice to the community. - Financial Literacy programmes - Business Start-up programmes - A youth centre offering training programmes and help to neglected and deprived youths. - Catch them Young for Children. This programme helps to develop children both morally and socially and assists with their education. <p>These initiatives will all serve to increase the public's access to the building and appreciation of its historic quality.</p> <p>In conclusion, having regard to the foregoing, it is our client's view that the Woolwich Town Masterplan should include community use as an appropriate and acceptable use for the former Gala Bingo Hall. We would ask you to amend the document accordingly.</p> <p>Further to our formal submission in respect of the above Masterplan dated 8th March 2012 and following our meeting with Neil Willey and Ciaran Kiely on Monday of this week we are writing to set out a further submission in respect to the proposed allocation of the former Gala Bingo site at Powis Street, Woolwich for leisure use. From discussions on Monday with your officers it became apparent that the aspiration behind that allocation was for a cinema use of the property.</p> <p>On behalf of our client we have the gravest reservations about that aspiration and hence feel it is necessary to put this further submission to you. We would ask you to consider it in your review of the the Masterplan.</p> <p>Whilst it might be a legitimate aspiration to deliver a cinema within Woolwich town centre, the former Gala Bingo site is not, we consider, suitable for that use. Allocation of the building for leisure use with the hope of it going into cinema use will, we believe, merely render the building redundant so that it will lie idle without use. Given its importance in Listed Building terms (it is Grade II*) this cannot be desirable.</p>

ID	Full Name	Organisation	Comments										
			<p>We say the aspiration for a cinema use of the building is unfounded because:-</p> <ul style="list-style-type: none">• The last cinema use of the building failed.• When Gala Bingo were known to want to vacate the building (a period of approximately 2 years) no interest in its use for cinema purposes was shown by any cinema operator. The only interest in the building was from churches.• Most modern cinemas are multi-screen venues. The historic importance of the building means that the physical changes that would be necessary to turn it into a multi-screen venue would be wholly unacceptable and we are sure would not receive the support of English Heritage. A multi-screen cinema use of the building would be wholly unacceptable in historic building terms.• The auditorium to the building is very large with a seating capacity in excess of 2,000. It is, as such, far too large for an independent cinema use which, we accept are operators who will sometimes take on former cinema buildings. Where they have, however, they have taken on far smaller buildings. For example, the following cinemas have capacity of: <table><thead><tr><th>Cinema</th><th>Seating Capacity</th></tr></thead><tbody><tr><td>Everyman, Baker Street</td><td>83</td></tr><tr><td>Everyman, Maida Vale</td><td>109</td></tr><tr><td>Everyman, Hampstead</td><td>120</td></tr><tr><td>Screen on the Green, Islington</td><td>119</td></tr></tbody></table>	Cinema	Seating Capacity	Everyman, Baker Street	83	Everyman, Maida Vale	109	Everyman, Hampstead	120	Screen on the Green, Islington	119
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31	Mr Bill Ellson	Secretary Creekside Forum	<p>Dear Sirs,</p> <p>Thank you for the opportunity to comment on the Woolwich Town Centre Masterplan.</p> <p>The masterplan should:</p> <ol style="list-style-type: none">1. Place a greater emphasis on employment, in accordance with London Plan Targets.2. Be in accordance with the Borough's Core Strategy, which is yet to be finalised.3. Be produced in an easy to use and print format (A4 portrait) with a reduction in the number of pages.										

ID	Full Name	Organisation	Comments
			In that Masterplan currently published fails in these respects it is UNSOUND.
33	Mr Stewart Christie		<p>The Woolwich Arsenal development has a significant proportion of high quality light industrial units built within the last ten years at the east of the site (IO Centre). The original remit of the scheme was to build a modern and truly mixed use development - it has actually won awards for this. The current masterplans show that you now intend to demolish all of these units, again for housing. As recently as 2008 the LDA stated that:-</p> <p><i>"The Royal Arsenal is a major, evolving regeneration project, which is ten years into what may be a 25-30 year development programme. The project has already created a new riverside mixed use community, with the private sector taking forward the development of the site once the infrastructure and enabling works had been completed. Berkeley Homes has completed 1,248 residential units, 26% affordable, with a number of the on-site Listed Buildings converted. The employment zone has been finished, which has provided new light industrial employment floorspace at the IO Centre and the Start Business Centre. The Firepower Museum opened in 2001 and the Greenwich heritage centre in 2003, with the new riverside park and riverside walk also opening early in the development.</i></p> <p><i>The Royal Arsenal development has generated 229 jobs to the local area and 283 to London to date, with the potential for a further 423 jobs to the local area and 407 to London over the next 15-20 years, as well as 2,317 housing units on top of the 1,248 already completed. The jobs created and forecast will generate additional output in the economy valued as £176m locally and £194m to London, representing a good return on the EP/ LDA's investment."</i></p> <p>Whilst I applaud the council for the new schools and sorely needed quality housing, I do have to question the merits of removing such a sizeable amount of skilled jobs and revenue from the local economy. Many of the businesses in this area are the kind of tech companies which currently provide one of our only national sources of growth and export. They will now be faced with a situation where their premises are effectively worthless and may have to wait up to 15 years before they see any kind of compensation or eventual compulsory purchase. This may also prove rather expensive as the head leases are for up to 999 years. Many have already been affected by the Crossrail development and are sitting out the current disruption after receiving assurances that the estate has a long term future. The only non-residential building which has been saved appears to be the British Library - is this for the prestige?</p> <p>If Greenwich are so concerned about future changes to local authority funding placing more emphasis on business rates, why remove successful businesses?</p>

ID	Full Name	Organisation	Comments
			The associated reintegration of north and south of the A206 is also of concern. A combination of traffic calming measures, new crossings and the removal of the Woolwich Ferry to Thamesmead will mean that more traffic and heavy goods vehicles will be tempted to avoid this section of road altogether. Does this mean widening of Nightingale Place, Plumstead Common Road and Burrage Road to divert this traffic from the south circular away from Woolwich Town Centre?
34	Ms Carol Kenna	Artistic Director Greenwich Mural Workshop	<p>Firstly to say I applaud the intention of producing a masterplan.</p> <p>However I am disappointed that it has not made greater effort to link into previous master plans and strategies that have been developed over the past years under the auspices of the Greenwich Waterfront Development Partnership and various Single Regeneration Budget proposals.</p> <p>Not sufficient attention is paid to Woolwich as defined by its river location and the ferry crossing. Should a crossing ever be built at Galleons Reach, Woolwich ferry (in some form) should be retained for its historical and therefore tourist potential and because it makes Woolwich unique along the length of the London stretches of the Thames.</p> <p>Site 1 – Glass yard: The replacement of the Waterfront Leisure Centre with flats misses the potential of this facility, one that is exploited to the full in Berlin and Paris where they create artificial beaches, swimming pools in the rivers and recognise the benefit to the quality of life that such a relationship with the river offers. It is also a facility that is predominantly used by local people. Blocks of flats exploit the riverfront only for the wealthy. Most often for people who invest in such properties, not live in them. Such development excludes local people it does not reconnect them to their river. It is well known that such developments are marketed first abroad particularly in Hong Kong, much later at home. This excludes local people.</p> <p>If this building is considered unsightly, let it be improved, not remove it for the cash cow it potentially is as a development site. Reconfigure the building to 'celebrate' the Woolwich Foot tunnel but keep its present function</p> <p>There is a site still laying undeveloped just west of the ferry, why didn't the masterplan look at this. Why hasn't the master plan looked at the two dry docks (past scuba diving and fishing centres) slightly further west and the potential of developing them as leisure facilities with a café, art gallery.</p> <p>This whole riverfront stretch needs rethinking including some of the vision that constructed the Royal Arsenal gardens.</p>

ID	Full Name	Organisation	Comments
			<p>Site 3 – Arsenal way The commercial / industrial use should remain. Further exploration of reconnecting such uses with the river is required. Woolwich needs employment as well as homes. Has anyone calculated what proportion of residents in the Royal Arsenal actually work and shop in Woolwich, compared with the proportion who sleep and use the rail networks to work and shop elsewhere.</p> <p>The whole plan refers to increased retail, cafes, leisure uses. Where do people work to facilitate this?</p> <p>Site 9 – 114 to 120 Powis Street This site appears to be currently under development, or is it just being demolished?</p> <p>Agree that Hare Street needs refurbishing and bringing back to life but how much retail can Woolwich sustain?</p> <p>Site 10 – Art Deco Co-op: I applaud the intention to list the RACS art deco building and I would urge the Council to do this as a matter of urgency. The current owners have left it to go waste. Again a unique asset that is rapidly reaching the point of inevitable demolition.</p> <p>I would ask the masterplan to extend its defence of Woolwich's Art deco heritage. Powis Street has a ribbon of art deco jewels starting with the cinema, RACS, the ex Electricity showrooms and the ex Woolwich Building Society.</p> <p>I support the proposal to make Bathway Quarter and Powis /Hare Street conservation areas.</p> <p>A205 / A206 Improvements: I support proposals to improve these roads, however the redesignation of the roads away from major commuter routes is not in the behest of Greenwich Council. Traffic can be slowed and this does appear to have been successful at Beresford Gate. A similar improvement would make an enormous difference near Hare Street linking the Street and the leisure centre. Improvements to the shops along Woolwich High Street including redeveloping what is currently a car wash would greatly improve an area that contains some of the oldest and historic building left in Woolwich</p>
35	Mr Stewart Christie		<p>This period of consultation should be better publicised and run for a longer period of time.</p> <p>I hope that future detailed proposals are allowed far greater scrutiny.</p>

ID	Full Name	Organisation	Comments
36	Crossrail	Crossrail	<p>Thank you for consulting us as part of the Woolwich Town Centre Draft Masterplan SPD consultation. We respond on behalf of our client Crossrail Limited whose interest relates to the future development of the site above the eastern end of the proposed Crossrail station box ('the OSD site'). The OSD site is that which is bound to the west by Arsenal Way, to the east by Cornwallis Road, and to the south by Cornwallis Road (see attached plan).</p> <p>Broadly, we support the principle of preparing a Masterplan to help manage the future development and regeneration of Woolwich Town Centre and we look forward to engaging further with officers as the preparation of the Masterplan continues. We are keen to ensure that the aspirations and objectives outlined in the Masterplan align as closely as possible with Crossrail's own aspirations for the development of the OSD site.</p> <p>In advance of this further engagement, the following provides our brief initial response to the formal consultation on the draft document.</p> <p>We acknowledge the identification of the OSD site within the area known as 'Site 3 - Arsenal Way'. This area is identified to become a new neighbourhood with mixed use residential-led development and this objective is supported. We also note that the site immediately to the west of Site 3 known in the Masterplan as 'Site 2 – Crossrail' incorporates the remainder of the land that sits above the proposed Crossrail Station. In our view, the OSD site should form part of the identified Site 2 rather than Site 3. This is on the basis that it would be more appropriate for all of the land located above the proposed Crossrail station to form part of a single identified site. In this regard, the existing proposed Site 2 and the OSD site face similar constraints in terms of the requirement to accommodate the Crossrail Station and we therefore think it is appropriate that these sites should be dealt with together. As such, we request that the boundary of Site 2 should be extended to the east as far as Cornwallis Road so that it also incorporates the OSD site. In requesting this proposed amendment, please also note that we support the aspiration for Site 2 to become a major focus for redevelopment.</p> <p>We also note that as part of the preparation of the Masterplan, a preliminary model has been prepared and that this provides an indication of the proposed layout and form which is envisaged for the regeneration of the town centre. Further to a recent presentation on the Masterplan given by members of the Allies and Morrison project team, we understand that the initial model is highly indicative and that it is not intended to provide definitive guidance on the proposed layout and scale of future development in the Masterplan area. Notwithstanding this, we would bring it the attention of officers that the preliminary model currently shows a route through the OSD site</p>

ID	Full Name	Organisation	Comments
			<p>running from west to east across the site in the area where the above ground element of the proposed Crossrail eastern station box will be located. From a practical perspective, it should therefore be noted that it is unlikely that this route would be capable of being delivered at this location and the indicative model should therefore be amended to reflect this.</p> <p>As set out above, we look forward to engaging further with officers during the Masterplan preparation. We are due to meet with officers shortly and we look forward to discussing our aspirations for the OSD site further then.</p>
37	Ruth Cunningham	Property Team	<p>The following comments represent the views of officers in Transport for London, Property Team in its capacity as a significant landowner only and do not form part of the TfL corporate response. This letter should not be registered as the TfL response as London's transport provider. A response on TfL wide operational and land use planning/ transport issue will be provided separately from Borough Planning as part of the GLA response.</p> <p>This Representation relates to the Woolwich Town Centre Masterplan. Whilst we have reviewed the Eltham Town Centre Masterplan, Charlton Riverside Masterplan and Greenwich Peninsula West Masterplan, we will not be commenting on those documents as we do not have any significant landholdings within the defined study spatial scope.</p> <p>Overall, we welcome the general principles set out in the Woolwich Town Centre Masterplan in respect of development on TfL land and we welcome further discussions with Borough Officers to ensure the proposals put forward for the sites are both viable and deliverable.</p> <p>TfL has a large land portfolio in Woolwich Town Centre, and overall, we support the principle of development on TfL land as identified in the Masterplan, in particular site 2 (Crossrail), site 3 (Arsenal Way) and site 5 (Lower Spray Street). As you may be aware, TfL Property is also progressing with development opportunities at TfL land fronting onto Green Ends Road and Woolwich New Road as indicated on the attached plan (referenced site 1). Given that the site is in the immediate vicinity of other identified development sites, it would be useful to understand whether the site was considered in the drafting of the Woolwich Town Centre Masterplan.</p> <p>As acknowledged in the Masterplan, the possible closure of the ferry could provide an opportunity for redevelopment around the terminal area which is also a TfL landholding.</p>


ID	Full Name	Organisation	Comments
			<p>Therefore, depending on the future operational requirements of the business, there may be an opportunity to discuss the future redevelopment of the site.</p> <p>A key objective of the Government's Planning Policy Statement 1', emerging 'Planning for Growth' paper, Mayoral Policy and the Royal Borough of Greenwich Unitary Development Plan and the emerging Core Strategy is the delivery of economic growth. Development on the sites will contribute to meeting this objective whilst complementing surrounding land uses and t as a catalyst for further development in the area. The delivery of residential development on the sites will contribute to meeting the Borough's annual residential target of 2,595 units as prescribed in the London Plan.</p> <p>The sites are in close proximity to public transport nodes and therefore development on the sites aligns favourably with the Mayor's and Borough's policy objectives which seek to promote development in areas with a high PTAL whilst reducing the need and reliance to travel by private car.</p> <p>Again, TfL Property welcome discussions regarding the development aspirations for the above sites, in particular land use and density whilst also discussing other TfL land holdings in the Borough. However, we would advise that the development of the above sites will be dependent on the viability of the proposals brought forward.</p>
38	Mr Dick Allard	Westcombe Park Society	<p>The following are the comments of the Westcombe Society on the Master Plans for the Royal Borough of Greenwich. Our comments relate mainly to Charlton Riverside, Peninsula West and Woolwich but the more general points also apply to Eltham.</p> <p>Transport</p> <p>The Master Plans concentrate on creating an environment which is visually attractive and conducive to community development, and on the economic and social contribution of various elements to local development. These are clearly crucial issues. However, despite some welcome discussion of the need to promote sustainable forms of transport, there is no discussion of the impact that the proposals will have on the transport system and the harmful impact that high traffic levels have on pollution, noise and thus on quality of life. Currently there is a high level of congestion on both our roads and public transport so it is hard to see how the Master Plan proposals in their current form can have anything but a negative impact on an already congested transport infrastructure. The document gives inadequate consideration to transport infrastructure beyond making some suggestions about possible extensions to the DLR and river transport as well as the cable crossing. In terms of public transport, we regard it as essential (even as part of the Vision) to indicate any part of the proposed development which (to avoid unacceptable levels of crowding on existing facilities) would be dependent on the DLR extension, or on other upgrades.</p> <p>Greenwich Peninsula is a very narrow neck of land surrounded on three sides by water with limited access routes. Charlton</p>

ID	Full Name	Organisation	Comments
			<p>Riverside is adjacent to the peninsular and also suffers from significant congestion. It is therefore hard to take many of the proposals seriously, especially the proposal to create a 40,000 seat outdoor sports and leisure facility. The plan admits that there is very little scope for further parking and yet public transport fails to cope adequately with events at the O2 and the roads become congested not only on the peninsula itself but also in the approaches. There is no consideration of the effects of the proposed development on the areas adjacent to the peninsula.</p> <p>To achieve high quality developments, any proposals within the Master Plan, residential, industrial or leisure should be subject to the over-riding constraint that it is consistent with an overall reduction of road traffic within the Borough, and that any increase in demand for public transport is made contingent on increased provision. In respect of road use, this means that any anticipated increase in traffic from new developments (for people or goods) has to be small enough to be fully compensated by reductions in demand from existing developments. Additional road capacity, such as the proposed Silvertown Tunnel, will not help, as they will simply induce corresponding additional traffic unless accompanied by other measures to restrain traffic.</p>
39	Mr Philip Binns	Greenwich Conservation Group	<p>Support the proposal to create a conservation area in the Bathway Quarter whose boundary should be extended to include the terrace of Grade 2 listed cottages in Market Street opposite the Magistrates Court. The preparation of the necessary documents (character appraisal and management strategy) could, if staff resources are available, be undertaken as a priority. Much of the background material has already been produced by English Heritage in its survey of the area. Support also the proposal to create a linking conservation area taking in Powis Street and Hare Street but urge that any development proposals for the south side of Woolwich High Street reflect the historical significance of the vernacular buildings (Nos. 108-132 (cons.)), as well as the Callis Yard area immediately to the east. Perhaps an extension of the conservation area proposed for Powis Street/Hare Street would go some way to ensuring this. Support the proposal for retaining the Art-deco Coop building in Powis Street and refurbishing it for an alternative use. Question whether further approaches should be made to English Heritage with a view to listing the building. Although acknowledging the wish to open up the view of the river from Hare Street, this can only be achieved through the demolition of the Waterfront Leisure Centre. Is this a sustainable approach to development? Even if the Council proceeds on the demolition route, this presupposes that another more central site has been made available on which to build the new facility prior to demolition of the old. The documents do not address this point. The development proposals for the Spray Street Quarter (site 4) must ensure that building heights are restricted to medium level and that towers, such as those approved for the Crossrail above-station development are avoided. Similarly, the extensive mixed-use residential neighbourhood development planned for the area to the east of the Royal Arsenal (Site 3) should be of an even lower height so that it is more respectful of the general built form on the approaches into Plumstead. This is not an appropriate place for iconic buildings for which approval has been granted in the Warren masterplan. We question to what extent have the service providers/statutory undertakings been involved in the preparation of the document. The amount of new buildings proposed can only put a strain on the existing facilities - sewers, water supply etc. The plans are understandably vague about the Woolwich Ferry given TfL's intention to create a new ferry crossing downstream</p>

ID	Full Name	Organisation	Comments
			linkingThamesmead with Beckton. We would argue that a ferry crossing at Woolwich should be retained perhaps restricted to lighter traffic, cyclists and pedestrians - and to complement the foot tunnel. Page 84 of the document should be adjusted to reflect the fact that the Edwardian Post Office (and Sorting Office) no longer exist and thereferenceto Bell View Gate on page 78 should be corrected to Bell Water Gate. These observations are in support of and supplement the comments made by the Woolwich & District Antiquarian Society.
40	Chris Smith	Greenwich Borough Liberal Democrats	<p>We welcome plans to further regenerate Woolwich Town centre and improve links to the river while protecting the historic buildings near the centre. Emphasising culture and leisure at the rail hub end of the town and retail at the west end builds on what is already happening and, as the report points out, large areas already have planning permission.</p> <p>Jobs and a vibrant local economy must underpin this scheme in particular. Attracting in local investment by making this a more attractive place to live and work is to be welcomed but this is a challenging area to develop without more money in the hands of local people.</p> <p>We would also like clarification on zoning in this plan. The masterplan appears to show units that are quite new being demolished to make way for residential use. The original development plan was for a mixed use community at Woolwich arsenal and in 2008 there was an LDA statement to the effect that the employment zone had been finished in this area. How does this fit together with the new plan?</p> <p>The very difficult transport network is mentioned - the legacy of splitting communities with large roads must not be allowed to happen again.</p>
41	Mayor of London	Mayor of London Greater London Authority	<p>Thank you for your letter consulting the Mayor of London on the draft stage of Charlton Riverside; Peninsula West; Woolwich and Eltham Supplementary Planning Documents (SPD). The Mayor has afforded me delegated authority to make comments on his behalf on emerging SPIDs. The GLA welcomes the opportunity to consider the documents at this draft stage. These comments are officer —level only and do not preclude any further comment the Mayor may make on future consultation phases of the Council's Local Development Framework.</p> <p>The following comments relate to all of the documents:</p> <p>Overall transport</p>

ID	Full Name	Organisation	Comments
			<p>The masterplans are very high level and 'visionary'. Although TfL has no objection to boroughs producing such documents, they must have been developed with an appropriate consideration of current and potential transport provision, in line with London Plan policies 6.1 (strategic approach) and 6.3 (assessing the effects of development on transport capacity). These four masterplans appear not to have been assessed for current and future transport accessibility and capacity, as required by the London Plan, and assume transport schemes that are not being actively planned and do not appear in the London Plan, Mayor's Transport Strategy (MTS) or east London Sub Regional Transport Plan(SRTP). Adopting the masterplans as supplementary planning documents (SPD) is therefore considered to be premature.</p> <p>As SPD, the masterplans will carry more planning weight than is considered appropriate for the level of assessment undertaken to develop them. Publishing before consideration of strategic transport impacts, capacity and requirements via for example the preparation or updating of Opportunity Area Planning Frameworks (OAPFs), also seems inappropriate. In the case of Eltham town centre, there is no OAPF, so the masterplan itself should be subject to further strategic transport assessment. If the masterplans are to be adopted as SPD, they should be heavily caveated along the lines of:</p> <p>'This masterplan is subject to assessment of its strategic impact on transport and other infrastructure, achieved as appropriate through the OAPF/masterplan process. In addition, individual planning applications should, as per local and London Plan policy, be accompanied by a transport assessment'.</p> <p>The masterplans also raise the following specific concerns that could conflict with London Plan and MTS policies and could have implications for transport operations. These concerns are outlined in more detail below, along with highlighting factual errors. TfL is making a separate response to RBG in respect of its development and commercial land holdings.</p> <p>Overall Strategic Industrial Land release</p> <p>The Mayor's Draft Land For Industry and Transport 2012, which is currently out for consultation, sets out that there is no capacity for employment land release in Greenwich for the period 2011 - 2031. However Greenwich is still in the limited transfer category</p>

ID	Full Name	Organisation	Comments
			<p>and as such there is some flexibility for release if this is backed up by robust local evidence.</p> <p>On a sub-regional basis within the South East London sub-region the actual quantum of industrial land release (54 ha) has been higher than the recommended 2010 Benchmark figure of 33 ha. The majority of this release has been in Greenwich and Southwark. While these rates of release are slightly higher than the comparative benchmark period figures, they are within the overall Benchmarks release timeframe release figures of 2006 to 2026 (which equates to 146 ha release in South East London).</p> <p>Overall energy</p> <p>Consideration should be given to the development of a district heating network. Comments on each of the documents are set out below:</p> <p>Woolwich town centre</p> <p>The SPD sets out the following objectives:</p> <p><i>-Expand the offer of the town centre to grow into a metropolitan centre; designate a site for anchor retail at the western end of Powis Street; improve links to the riverside from the town centre; animate the riverside through active uses and enhanced public spaces; identify area for leisure, community and cultural uses within the town centre; identify opportunities to improve links and accessibility to the surrounding residential areas, particularly across the A206 and A205; establish development sites that can deliver further retail within the town centre; identify sites for residential use within the town centre and maintain its fine grain urbanism; develop a strategy for building heights and urban form within the town centre."</i></p> <p>Principle</p> <p>The London Plan 2011 sets out that Woolwich Town Centre has the potential to grow into a metropolitan centre. The objectives set out for the SPD, including industrial land release, are broadly in line with London Plan policy and are an appropriate response to the DLR extension and Crossrail. Further discussions are welcomed on the details, in particular the proposals for individual sites.</p>

ID	Full Name	Organisation	Comments
			<div>  <div>Transport</div> </div> <p>Woolwich town centre is experiencing great change and the DLR extension has transformed accessibility. Crossrail will provide another step change in transport capacity and connectivity from 2018. It is therefore appropriate that the vision for the town centre is bold and growth-led, taking into account this future transport capacity. The London Plan and MTS support intensification and diversification of town centres and promote improved transport, particularly better public transport, cycling and pedestrian links. The masterplan asserts that the town centre is 'reasonably well connected' (page 96) when in fact it already has the highest public transport accessibility level (PTAL) of 6.</p> <p>A key issue identified in the masterplan is the severance caused by the A205, part of the Transport for London Road Network (TLRN) and A206, part of the SRN. It will be important to consider the impact on traffic flow of any proposals to reduce this severance, in line with London Plan policy 6.11. For example, the masterplan refers to 'reappraising the status' of these roads, introducing 'traffic calming' and more specifically 'shared surfacing' for Woolwich High Street. Proposals such as these would require detailed assessment of traffic, air quality and carbon emission impacts, weighed against benefits for pedestrians and cyclists.</p> <p>It is possible that, with introduction of the proposed ferry 2, to Gallions Reach and potential, consequent closure of Woolwich ferry, traffic on the A205 and A206 could be reduced and congestion at the Woolwich Ferry roundabout eased. This could provide an opportunity for improved pedestrian and cycle facilities, as identified in the masterplan, but must be subject to further modelling and assessment. The foot tunnel to North Woolwich should be retained in any redevelopment and access thereto improved.</p> <p>The masterplan text states "proposed Gallions Reach Ferry and Bridge will potentially lessen the need for the Woolwich Ferry and therefore reduce traffic on the A206". Current proposals are for a ferry only, although the MTS does not rule out a bridge option.</p> <p>As acknowledged in the masterplan, possible closure of the ferry could provide an opportunity for redevelopment of the terminal area, which is also a TfL landholding.</p> <p>As per the Charlton Riverside masterplan, the Woolwich town centre masterplan references GVV, but in this case more</p>

ID	Full Name	Organisation	Comments
			<p>specifically as a project to be delivered in the future. As above, it would be more appropriate for the masterplan to refer to 'improvements to bus services'. In addition it is suggested that in particular the proposed routing through the Woolwich Arsenal site is not shown unless or until operational issues have been assessed and to avoid concerns about impact upon adjoining property.</p> <p>Also, as per the Charlton Riverside masterplan, there is no clear statement on the vision for future sustainable access to the town centre, for example mode share aspirations consistent with those set out in the SRTP, making better use of the river for passenger transport and approach to parking. The latter is particularly important when considering the balance of availability of public town centre parking against public transport accessibility and directly affects level of traffic on the A205 and A206.</p> <p>Again, a statement of funding sources and approach to CIL/s106 should be included in the delivery chapter. This is particularly important in the context of existing s106 funding for Crossrail, which will continue at least during 'Phase 1' (2012-2017) of delivery of the masterplan.</p>
42	Metropolitan Police Authority	Metropolitan Police Authority	<p>I write on behalf of our client the Mayor's Office for Policing and Crime / Service (MPA/S) with regard to the above draft documents. They have been reviewed by CgMs on behalf of the MOPC/MPS, mindful of relevant national and local planning policy, and we therefore make the following observations and recommendations.</p> <p>The MOPC/MPS provide a vital community service to the Royal Borough of Greenwich and policing is recognised within the 2011 London Plan as being an integral part of social infrastructure. It is essential that the MOPC/MPS are well represented within the emerging LDF documents and these masterplans in order to ensure that the impact of new development upon policing can be mitigated.</p> <p>Context to Represent tions</p> <p>The provision of effective policing is of crucial importance across London to ensure safe places to live are created as part of a sustainable community consistent with planning policy. I therefore refer briefly to relevant policies regarding the consultation masterplan documents below:</p> <p><i>National Policy</i></p>

ID	Full Name	Organisation	Comments
			<p>The MPA are mindful that PPS1 states that Councils should prepare development plans which promote inclusive, healthy, safe and crime free communities Also Circular 05/05, paragraph B9, advises that developers may be expected to pay for or contribute to the cost of all, or that part of additional infrastructure provision, which would not have been necessary but for their development.</p> <p>— One of the objectives of the Draft National Planning Policy Framework (NPPF) July 2011 is to deliver the right community facilities, schools, hospitals and services to meet local needs (para 124).</p> <p><i>London Plan Policies</i></p> <p>At strategic level, paragraph 1.40 of the London Plan (July 2011) states '<i>a growing and increasingly diverse population will create demand for more social infrastructure</i>' which, by definition, includes policing and other criminal justice or community safety facilities.</p> <p>This is reflected in Policy 3.16 Protection and Enhancement of Social Infrastructure which states that '<i>London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population</i>'. Paragraph 3.89 further notes that existing or new developments should, wherever possible, extend the use of facilities to serve the wider community, especially within regeneration and other major development schemes.</p> <p><i>Local Policy</i></p> <p>In addition, policies SCI and CI of Greenwich's Unitary Development Plan provide overall support for community services and facilities and Annex G of the Planning Obligations SPD (Adopted September 08) strongly support the provision of policing facilities in the borough.</p> <p>Given the support for policing within the national and regional planning policy context, it is therefore appropriate to ensure that the needs of the MOPC/MPS are reflected within the masterplan documents.</p> <p>General Representations</p> <p>In line with the overarching policy, it is key for the emerging masterplans to be supportive of policing and the provision of policing.</p>

ID	Full Name	Organisation	Comments
			<p>Key to this is the provision of new policing facilities in line with development growth in the four masterplan areas. The MOPC/MPS are mindful that significant additional development is likely to come forward within the four masterplan areas through the introduction of new uses and the intensification of existing uses. The scale of development will increase demands on police resources and the MOPC/MPS request that this impact upon policing be regarded as a material consideration during application determination process and that this is reflected within the emerging masterplans. This would ensure the masterplans are in accordance with London Plan Policies, in particular 3.16, and policies SCI and CI of Greenwich's UDP. Additional wording in each masterplan supporting the provision of contributions towards policing would address the issue.</p> <p>Safety and security through good design is key in ensuring crime reduction. Secured by Design is an important initiative promoted by the Metropolitan Police to ensure a safe and secure environment is created within development proposals. Section 16 of PPSI states that plan policies should deliver safe, healthy and attractive places to live. The inclusion of Secured by Design (and other similar measures) in the emerging masterplans is required.</p> <p>It light of both points above, it is requested that the MOPC/MPA are consulted in relation to all major applications in the masterplan areas.</p> <p>Woolwich Police Station, located within the masterplan area, is earmarked as a 'building for refurbishment/renovation'. It is planned to retain this building as a police station.</p>
43	Janet Goulton	Planning and Development Manager London City Airport Limited	<p>We would like to thank you for your email inviting London City Airport to comment on the Masterplans in place for Charlton Riverside, Woolwich Town Centre, Greenwich Peninsula West and Eltham Town Centre.</p> <p>Aerodrome safeguarding ensures the safety of aircraft and their occupants when in the vicinity of an aerodrome by controlling potentially contentious development and activity around it. London City Airport has a very specialised set of safeguarding surfaces which surround the airport, approved by the CAA, to ensure that building heights do not interfere with safe aircraft operations.</p> <p>Our support for development and regeneration in London is complimented by our approach to aerodrome safeguarding and consequently we would like to draw your attention to the Civil Aviation Authority's (CAA) documentation entitled CAP 738 <i>Safeguarding Aerodromes</i> and specifically <i>Appendix C London Tall Buildings Policy</i>. This document specifies the CAA's policy with regard to future buildings or other constriction developments and the need to maintain the safe and efficient use of airspace over London.</p>

ID	Full Name	Organisation	Comments
			Whilst London City Airport in principle supports the proposals put forward and is keen to assist with the sustainable development of the area, it must be stressed that early consultation on the above issue in conjunction with the CAA's London Tall Buildings Policy is vital, and we actively encourage developers to bear this in mind throughout the planning stages.
44	Carmelle Bell	Planning Administrator Thames Water Plc	<p>As you will be aware from previous representations, Thames Water are the statutory water and sewerage undertaker for the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2004 (as amended in May 2008). The provision of water and waste water infrastructure is essential to any development.</p> <p>We have the following comments on the consultation document:</p> <p>Waste Water/Sewerage and Water Infrastructure</p> <p>A key sustainability objective for the preparation of the new Local Development Framework should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 5.1 of PPS12 relates to other Development Plan Documents (DPDs) and states:</p> <p><i>“ LPAs should consider the following criteria when determining which DPDs other than the core strategy they produce:.....In considering these questions, the following issues should be considered:</i></p> <p><i>- the requirements of utilities/infrastructure providers... ..”</i></p> <p>Policy 5.14 of The London Plan, July 2011 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and states:</p> <p><i>“Strategic</i></p> <p><i>A - The Mayor will work in partnership with the boroughs, appropriate agencies within London and adjoining local authorities to:</i></p> <p><i>a) ensure that London has adequate and appropriate wastewater infrastructure to meet the requirements placed upon it by population growth</i></p>

ID	Full Name	Organisation	Comments
			<p>and climate change</p> <p>b) protect and improve water quality having regard to the Thames River Basin Management Plan</p> <p>Planning Decisions</p> <p>B - Development proposals must ensure that adequate wastewater infrastructure capacity is available in tandem with development. Proposals that would benefit water quality, the delivery of the policies in this Plan and the Thames River Basin Management Plan should be supported while those with adverse impacts should be refused.</p> <p>C - Development proposals to upgrade London's sewage (including sludge) treatment capacity should be supported provided they utilize best available techniques and energy capture.</p> <p>LDF preparation</p> <p>E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel."</p> <p>Policy 5.15 of the London Plan relates to water use and supplies.</p> <p>It is unclear at this stage what the net increase in demand on our infrastructure will be as a result of the proposed development. However, the masterplans need to consider the net increase in waste water and water demand to serve the development and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.</p> <p>The list of issues covered in the masterplans should therefore make reference to the provision of sewerage and water infrastructure to service development. This is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.</p>

ID	Full Name	Organisation	Comments
			<p>To accord with PPS12 and the London Plan text along the lines of the following section should be added to the framework:</p> <p>“Water Supply & Sewerage Infrastructure</p> <p><i>It is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.</i></p> <p><i>Further information for Developers on water/sewerage infrastructure can be found on Thames Water’s website at: http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm</i></p> <p><i>Or contact can be made with Thames Water Developer Services</i></p> <p><i>By post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY;</i></p> <p><i>By telephone on: 0 845 850 2777;</i></p> <p><i>Or by email: developer.services@thameswater.co.uk ”</i></p> <p>Thames Water would also welcome the opportunity to work closer with the Local Authority to better understand the proposals as they evolve with time.</p> <p>Other Comments</p> <p>We would also like to draw your attention to the following issues with regards to the draft AAP:</p>

ID	Full Name	Organisation	Comments
			<p>Tree Strategy and Planting –</p> <p>Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system and water supply infrastructure. In order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.</p> <p>Access –</p> <p>Thames Water will require 24 hour vehicular access to any pedestrianised area to undertake emergency works. Access to the sewerage and water supply infrastructure must not be impeded by street furniture. This will enable Thames Water to operate the network with as little interruption to the service as is possible.</p> <p>7 Catering Establishments –</p> <p>Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in properties suffering blocked drains, sewage flooding and pollution to local watercourses.</p>
45	Ms Anna Townsend	Greenwich Environment Forum	<p>SUMMARISED FROM ORIGINAL HAND WRITTEN RESPONSE</p> <p>1. Agree that significant drivers are already beginning to regenerate the town centre of Woolwich but believe too much has already been lost and undervalued. Determination of Council to encourage development of tall residential blocks of largely one and two bedroom flats without paying adequate attention to encouraging new technology companies to bring their enterprise into the Borough, and allocating former industrial land and river wharves to do this has been a fundamental mistake and has resulted in a lack of skills and employment</p> <p>2. While population loss has been a part of this change, the new population occupying the spaces and dwellings of those who have moved elsewhere are of different origins and culture. New frameworks will be required if the carrying capacity of Woolwich are to</p>

ID	Full Name	Organisation	Comments
			<p>maintain social well being and acceptability in the future.</p> <p>3. This is barely touched on in this masterplan, which clearly indicates that the town is seen as a future powerhouse to the Borough. Significant omission of sustainability</p> <p>All 3 of the riverside masterplans, - Charlton Riverside, Greenwich Peninsula and Woolwich - lack a sustainable development approach even though this is a critical part of the planning system (Planning Policy Statement 1). We seek changes to the vision and objectives of all 3 masterplans so that environmental, economic and social sustainability are brought to the centre of the documents.</p> <p>Environmental sustainability</p> <p>The vision and objectives should engage wholeheartedly with waterside issues, and draw attention to the value and importance of protected wharves and facilities.</p> <p>The objectives should include:</p> <ul style="list-style-type: none"> - To maximise the potential for freight transport by river, the aim is to safeguard all wharves providing access points for freight along the riverfront. - A presumption against tall buildings along the riverside, given their seriously

ID	Full Name	Organisation	Comments
			<p>negative effect.</p> <p>The riverside is a very green area, so it is surprising that the vision and objectives do not give a high priority to the protection and enhancement of green space, including natural habitat.</p> <p>The proposed developments will increase traffic, and measures need to be taken to protect air quality. These should be stated as objectives, including Low Emission Zones.</p> <p>We would like to understand the impact of development on carbon emissions and there should be a commitment to carbon accounting.</p> <p>Economic sustainability</p> <p>Some of the objectives - for example for Charlton Riverside - have a lot to say about employment, but the vision in each document is to relocate (at best) existing businesses and industries, to delete some of the strategic industrial locations and to use employment land for residential development. Even the proposed Charlton Garden City is characterised by its residential function, ignoring the important economic base that</p>

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			<p>informs the Garden City model.</p> <p>In the London Plan, these areas are set a target for employment growth, ranging from 1,000 new jobs at Charlton Riverside to 7,000 new jobs at Greenwich Peninsula.</p> <p>Therefore, the vision for all 3 must include the aspiration to achieve employment growth, clearly stated as a net increase in jobs. To be sustainable the vision should also be towards a low carbon economy.</p> <p>Several objectives will assist in the delivery of more jobs and a low carbon economy.</p> <p>There must be reference to higher education growth, high tech industries, investment in engineering and architecture. But this is the high end and there is also the need - and this is the part that is missing - to really address low wages and poor conditions in retail, catering, cleaning, personal care, repair and maintenance. There must be reference to the London Living Wage, to training opportunities, and to economic diversification .</p> <p>The objectives should be proposing a variety of green jobs, and there should be recognition of the voluntary sector contribution to the economy, including social</p>

ID	Full Name	Organisation	Comments
			<p>enterprises. A vision of local sourcing, local procurement of services, support for local shops, businesses and street/covered markets would also help promote more sustainable local economic activity.</p> <p>Social sustainability</p> <p>The vision should be for a lifetime neighbourhood and a walkable community, where all amenities and services are within walking distance. This includes local shops, play areas and community meeting spaces as well as local education and health provision. These are all very important social infrastructure which must be explicitly mentioned.</p> <p>The objectives should also make clear that affordable family housing is the highest priority</p> <p>We note the deficiencies in the consultation on these masterplans and we expect there will be a far more collaborative approach to the production of the Core Strategy submission document. We look forward to discussing with you how sustainable development can be at the heart of the Core Strategy.</p>

ID	Full Name	Organisation	Comments
46	Andrew Bullivant	Shooters Hill local history group	<p>SUMMARISED FROM HAND WRITTEN RESPONSE</p> <p>Introduction page 7 - para beginning 'Woolwich town centre is strangely isolated' - fourth sentence, the residential suburbs are to the south, not the north</p> <p>Page 8 - discussion on future of the ferry. South circular does not run through Woolwich town centre but forms its western boundary. If a new ferry is sited at Gallions Reach, all the traffic will travel through the town centre on the A206 unless a new road was built say through Oxleas Wood. Is that what you are proposing? Not much of the traffic on the A206 is currently ferry traffic.</p> <p>Proposal to move the leisure centre - should the plan not identify a replacement site for the leisure centre? Cannot easily be resited. Maybe part of Site 4 or Site 12 would be suitable. On the site of the existing leisure centre, was a 17th century Woolwich stoneware pottery kiln which still remains at the Greenwich Heritage centre, but not on display</p>
47	Mrs S Bullivant	Woolwich & District Antiquarian Society	<p>SUMMARISED FROM HANDWRITTEN RESPONSE</p> <ol style="list-style-type: none"> 1. General Gordon Square - now mainly bare and concrete and used mainly by skate boarders. This will become a nuisance when people want to sit quietly. Planting of flowers is dull and featurless. 2. Beresford Square Market - anxious that the metal sculpture of 'the Great Harry' be replaced and resited 3. Site of Bathway Quarter - suggest it be called the civic centre. Bathway itself is a small street outside the baths. Applaud proposal for a conservation area 4. Site 6 Wellington Street - care should be taken to retain the remaining Victorian and Edwardian buildings at the lower end of Wellington Street as well as the listed terrace on Thomas Street 5. Site 1 Glass Yard - welcome a new river vista but concerned at the loss of a fairly new leisure centre. Old buildings in Woolwich High Street should be protected 6. Woolwich ferry - important that this stays in Woolwich continuing historic cross-river links. Would not object to having an

ID	Full Name	Organisation	Comments
			<p>addiitonal ferry at Gallions Reach</p> <p>7. Site 4 Spray Street Quarter - would be an excellent site for a new leisure centre and would urge the council the purchase this for it</p> <p>8. Indoor Market on Plumstead Road - historic market with its unique roof structure should be brought back into use. Needs refurbished</p> <p>9. Site 9 114-120 Powis Stret - important corner site - needs good architectural detailing. Welcome a new shopping area looking to the river with sitting out areas for cafes. Welcome the conservation areas proposed</p> <p>10. Travelodges, Powis Street - applaud the new use for this building</p> <p>11. Site 10 Art Deco RACS building - delighted that this will not be demolished and put to new uses</p> <p>12. Site 12 Beresford Street - should be representation or reminder of the 'ropewalk' used in naval rope walking, which was the origin of this long street</p> <p>13. Royal Arsenal - river transport should be more publicised and commuter traffic extended</p> <p>14. Crossrail - regret the structure planned, which will obscure views from Plumstead Road</p> <p>15. Site 14 DLR station - overstation development is too high. Route of the DLR itself involved the loss of many locally listed buildings. This could have been avoided if a different route had been chosen</p> <p>16. Tesco Love Lane development - this large development will lead to loss of trade locally in Powis Street and to small shops and will not improve Woolwich</p> <p>P6 78 - Bell view gate, should be Bell Water Gate</p>

ID	Full Name	Organisation	Comments
48	Miss PM Perrin	U.K.I.P	<p>SUMMARISED FROM HANDWRITTEN RESPONSE</p> <p>Pleased to learn about a new travellers style hotel in Woolwich centre.</p> <p>Would like to know how it is proposed to integrate the various distinct parts of Woolwich ie. the Market, Powis Street, the Arsenal Site and areas of offices and housing up the hill</p> <p>Consultation has been inadequate. Time allowed was too short and failure to recognise those that can't read from a computer screen. Alternative was expecting people to visit a library to read the documents.</p>
49	Ashleigh Marsh		<p>I have not found it as easy to separate emotion from reason as the masterplan seems to. My feeling for Woolwich comes from a long association with the area, having been to workshops at Greenwich Young People's Theatre as a teenager, having swum and taught at the old Eaglesfield School, having done a lot of my shopping there over the years, being reliant on the Free Ferry and foot tunnel to visit my friends and family and being an occasional and enthusiastic user of the Waterfront skatepark and the leisure centre, and hanging out in jazz clubs..</p> <p>My first concern has been that the Woolwich masterplan does not provide as well as at present for public recreation space. There is a clear duty to provide this in the London Plan. The area of most intense recent residential development, largely East of Woolwich Arsenal, has already been designated as a Public Open Space Deficiency Area. The Woolwich masterplan should have considered this local need, at least with as much priority as retail and residential development. Intense built development has historically caused problems in areas where active play space has been limited, especially where there is economic challenge. Paved and landscaped concrete plazas do not fully fill this function.</p> <p>I asked at one of the public presentations why the redevelopment of the Warren Lane Waterfront Park had not been mentioned in the masterplan. I was told that since planning permission had already been granted for building this was not relevant. How can this be? This park of a few acres is the only large play space for the whole riverside from Woolwich Dockyard to Thamesmead. I have an inkling from reading the masterplan that significant play space would not be considered suitable for the site of the existing Leisure Centre, which is presented as a potential corridor from Hare Street to the River rather than a park.</p> <p>There is no site identified for a new Leisure Centre either. The Leisure Centre is a large building and serves a large community, There is simply no other site in the area large enough for it. It takes up more floorspace than the new Tesco, doesn't it? (It is a little hard to calculate as the plans only shows maps after the proposed development.) Is there anything wrong with the Leisure Centre</p>


ID	Full Name	Organisation	Comments
			<p>building, apart from that it is by the river? This wasn't thought to be a big problem when it was built there recently to serve the community.</p> <p>Then we have the sorry state of the circle skatepark. I skateboard often, and am pretty shocked both that replacing this outdated, hard to maintain facility - dangerous at times - is relegated by the masterplan to 'phase 4'; and that the plan doesn't guarantee a free public skatepark on a suitable scale for Greenwich - the largest London Borough, with a rapidly expanding population, in a relatively deprived area.</p> <p>If the circle skatepark really can't be brought up to standard for whatever reason then a quality replacement is needed nearby, which must be:</p> <ul style="list-style-type: none"> - Soon - in time for the Olympic legacy - Free to use - Large enough - at least 1000 square metres - Well designed and built by specialists - In a visible location, not behind locked gates - Accessible by all - the skatepark community is multigenerational and thrives on skill sharing and peer mentoring <p>We currently have two inadequate skateparks in the borough, built by people who did not understand the needs of wheeled sports enthusiasts. Wheeled sports provide a creative outlet for people, often but not always young, who may not enjoy more regulated sports opportunities. The masterplans do not address at least 3 of the above points, and fail to learn from experience. I am sure a little more communication with people in the council work for the community in Parks and Open Spaces, and Sport, as well as Youth and Community Policing, could have provided good advice here.</p> <p>I am also frankly mystified by the almost casual mention of the Free Woolwich Ferry, with the emphasis on Free. Not only is this part of our heritage, it is a vital river crossing. If more traffic flows to a downstream or upstream alternative this will have an impact on the riverside that needs to be strategically considered. How many commuters use the Free ferry to get to East London? I always worry when vague suggestions (like closing the Ferry) are made in a consultation document like this. If there is a chance the Ferry will be closed then it is a bit daft not to fully research the impact it would have on this plan.</p> <p>As for culture and shopping, the bits of Woolwich I like to be in are the bits that the plan wants to make more like the bits I don't like. I guess this is what it means by 'comparison retail'. Basically I like the less regulated bits, where small businesses can afford to</p>

ID	Full Name	Organisation	Comments
			<p>trade. Obviously Woolwich has suffered economically since Thames Polytechnic became The University of Greenwich, moved up the road, and changed its technical engineering focus to a more business orientation. Is this business focus now coming back to haunt us with big ideas but less local knowledge? It is safer to have low rent shop space that will not run the risk of blight by market overload. Let the new expanding population generate retail development slowly and sustainably, without wiping out existing small shopkeepers who are earning a living, providing jobs and selling things that local people want. These folk have stuck by Woolwich through the hard times and are ready and willing to move forward with local needs at heart - true gentry.</p> <p>Culture-graft or evolution? This is the question for Woolwich town centre. Allies and Morrisons wax lyrical over the quality of local architecture. They are mentally pricing everything except the value of continuity. There is a lot of public housing in the area. When many of our estates were built they seemed ugly and it took decades for communities to take root. We thought density, high rise and lack of amenity space were the problems, and the fact that people were suddenly displaced from their social networks and plonked on a new estate. Essentially we were right. Redesigned hallways and public areas are not a universal solution - they have worked on estates where the residents are already settled. The only real differences in modern approaches to housing seem to be that the prices are a lot higher, and sociology follows different fashions. We've had all the rhetoric about redesigning the public realm before with different labels and hemlines. Imposing a designer's vision on an area in one huge swathe is still questionable. There isn't enough scope to learn and make more successful choices during the process. This is not to say don't have strategy. It is to say have a strategy that is well thought out enough to have somewhere to put the leisure centre before you decide to move it, for example, and to build homes where ordinary people can afford to have children without both parents having to work full-time.</p> <p>And while I love a good jazz club, the best ones in Woolwich were the Tramshed and TJs. The Tramshed couldn't stay open without subsidy and TJs was a cheap dive. I think you'll find jazz came out of cheap dives and is still at home there. If you want music to eat your dinner by, that's ok, but ask yourself if the musicians can afford the same fare? If not then what are you looking at?</p>
50	Dagmar Ventures Ltd	Dagmar Ventures Ltd	<p>In response to the draft SPD, I comments as follows:</p> <p>We are grateful for the opportunity to comment on the Council's emerging Woolwich Town Centre Masterplan SPD. This comment is submitted on behalf of Dagmar Ventures Limited who have an interest in the Art Deco Co op building at the western end of Powis Street (ie Site 10 of the draft SPD).</p> <p>We welcome the Council's re-stated objective to attract redevelopment to this end of Powis Street, in a bid to</p>

ID	Full Name	Organisation	Comments
			<p>extend the retail offer further down Powis Street and further west than it currently extends and also to attract more life and vitality to this end of, what is, the main shopping street in Woolwich town centre. This objective has been an aspiration of the Council for over a decade and we fully support the Council's decision to continue to pursue it as part of this most recent policy document.</p> <p>Regarding the Art Deco building itself, we fully support the Council's preference that any scheme of redevelopment retain (and refurbish and/or convert and/or extend) the building. It is locally listed and clearly held in local affection and retention/conversion/extension (as opposed to demolition and replacement with a new building) is the optimum redevelopment solution.</p> <p>Regarding the potential uses of Site 10, we endorse the Council's stated over all aim to create a flexible strategy that can respond to the many initiatives coming forward in Woolwich at the moment. We also support the Council's preference to see uses introduced to the ground floor (potentially including retail, restaurant and café uses) that complement the use of the upper floors. The ground floor space in the Art Deco building, however, would lend itself to a single occupier (as an alternative to smaller units) and there seems to us no planning reason why the building should not accommodate one unit and still achieve the goal of attracting people and activity to this end of Powis Street as a result.</p> <p>As regards the Council's preference to see residential use accommodated within the upper floors, we support that goal. Again, however, the SPD should allow for some flexibility and there is no reason why other uses (such as student accommodation, hotel space, serviced apartments, other related-residential use(s), etc.) could not also potentially be accommodated and achieve the goal of bringing vitality to this end of Powis Street and also complement the ground floor uses listed above.</p> <p>We support the timeframe within which the Council are keen to see redevelopment come forward on Site 10 (i.e., namely, within the first Phase (2012 – 2017). If the wider objective as regards extending the retail offer along the western end of Powis Street is to be achieved, in view of the fact that (1) Travelodge are building out their recently consented scheme on the opposite side of Powis Street currently and (2) TK Maxx are taking space in the building on the junction of Hare Street and Powis Street, just several yards from our site, there is an undeniable logic to bringing forward redevelopment of Site 10 in tandem with the current redevelopment activity being carried out.</p>

ID	Full Name	Organisation	Comments
51	Nick Raynsford	MP	<div data-bbox="584 209 981 252" data-label="Image"></div> <p>I am writing to give my views on the three Masterplan consultations tiRerway for three locations in the Greenwich and Woolwich constituency: Woolwich town centre, Charlton Riverside and Peninsula West. The fourth Masterplan, for Eltham Town Centre, is of some interest to me but I will not comment on it here as it is outside the constituency.</p> <p>General comments</p> <p>I understand that the four Masterplans are draft Supplementary Planning Documents (SPDs) and form part of the Royal Borough's Local Development Framework (LDF). They follow the council's agreement of a Kidbrooke SPD in 2008 and a Thamesmead and Abbey Wood SPD in 2009.</p> <p>I welcome the consultation, but the process seems to be somewhat rushed. I understand that the timetable did not allow any time for stakeholder discussion ahead of the publication of the Draft Masterplans in mid-February.</p> <p>The council's website says "Work on these documents began in 2011 with initial public consultation taking place later in the year. Adoption of the document is expected in 2013." This suggests that plans were in place for a consultation starting in 2011 and running into 2012 — a far longer period than the four-week period of consultation currently underway. The documents were not available on the council's website until Friday 10th February and consultation closes at 9am on Friday 9th March — just four weeks later.</p> <p>Usually, consultation on such planning documents lasts at least six weeks, not four. Consultation on the Core Strategy (the overarching part of the Local Development Framework) took place over 12 weeks, starting in November 2010 and ending 5</p>

ID	Full Name	Organisation	Comments

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			 <p>February 2011. I note that the Thamesmead and Abbey Wood SPD had a consultation period of six weeks (31 January to 13 March 2009), as did the Kidbrooke SPD (24 October until 5 December 2007).</p> <p>Residents have contacted me to say they are concerned that the current consultation on four Masterplans is taking place over just four weeks. While several workshops have been held (which are welcome), these have been arranged at very short notice.</p> <p>It is not clear why the consultation process did not start earlier or continue later: electoral purdah ahead of the London Mayoral elections does not start until 29 March. The final deadline for these SPDs to be consulted upon is not until this summer, when final submission of the Core Strategy is proposed.</p> <p>I will now comment on each of the three Masterplans in my constituency in turn. I Woolwich Town Centre</p> <p>Many of the themes in the Masterplan are familiar, and have been a common feature of planning frameworks for Woolwich over many years:</p> <ul style="list-style-type: none"> • reduction in the severance caused by the A206; • strengthening the retail offer in Woolwich, particularly at the east end of Powis Street (where a Hotel is already being created in the old 1903 Co-op building and TK MAXX have already confirmed they are due to open across the road); • better links to, and more active uses on, the riverfront; • long-term redevelopment of the "collar" of mono-tenure council housing around the town centre (although these estates are outside the Masterplan area, which defines the town centre very tightly) <p>The report restates the very ambitious goal of making Woolwich a "Metropolitan centre" — in the current London Plan there are only two of these in southeast London (Bromley and Croydon) and only nine others in the London suburbs (Ealing, Harrow, Hounslow, Kingston, Ilford, Romford, Sutton, Uxbridge and Wood Green). This would imply Woolwich becoming a more important retail centre than Bexleyheath, Eltham, Lewisham or Canary Wharf.</p> <p>One other new proposal is to seek redevelopment (in Phase 3 of 3, 2022-27) of the recently built, but poor-quality low-rise</p>

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			<p>industrial sheds to the east of the Crossrail station site (around Middlegate House, the GLL offices), with a new primary school there. The area would be predominantly residential but with some office and other employment uses.</p> <p>There are some interesting proposals buried away in the report: I am pleased to read that the National Children's Museum, Eureka!, is apparently looking for a London base to complement its home in Halifax, and the Royal Arsenal is a possibility. I would appreciate more detail on this and what stage the discussions have reached.</p> <p>The other key proposal is for a conservation-led solution to Powis Street and the core of the Town centre, with a new conservation area for Powis Street/Hare Street</p>

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			<p>(including the Art-Deco Co-Op building, which is recommended for conversion into flats) alongside the one already proposed for the civic buildings around the Town Hall (now known as the "Bathway Quarter") which has not yet been instituted despite being recommended several years ago. The report suggests that the council should seek temporary uses of buildings in this area to try and revive these streets ahead of any long-term conversion to Housing (seen as the dominant likely use in the area) or new institutional uses.</p> <p>Concerns</p> <p>1. On Thomas Street and Wellington Street, Victorian buildings on either side of the burnt-out Wetherspoons pub are proposed to be retained and refurbished, rather than the wholesale redevelopment of that part of the town. In the context of new developments on adjoining sites, this may not prove an entirely satisfactory outcome.</p> <p>2. The plans contain one big new proposal: relocation of the Waterfront Leisure Centre to another site in the town centre by 2021, releasing this site for a new Riverfront residential quarter and extending Hare Street up to the river. This is all very welcome in my view, provided the council achieves best value from the disposal of the current waterfront site, and its redevelopment is of high quality. The Masterplan report adds that the Ferry terminal site next door could be included, as the Ferry could be obsolete by 2017 if a new Thames crossing at Gallions Reach is open by then, which seems unlikely. Would the council be seeking to relocate the Waterfront leisure centre irrespective of whether the Ferry continues or not?</p> <p>3. The Masterplan reports that the Tesco development is underway but contains little assessment of its impact in terms of parking, footfall, or retail competition. The Masterplan envisages a steep increase in retail floorspace in Woolwich, on top of the huge Tesco already being built, with new retail uses on Hare Street, Powis Street and Plumstead Road (as part of the "Spray Street quarter"). It remains to be seen whether the arrival of Tesco will or will not help drive more retail uses in the town centre. There is also little acknowledgement of the threat posed to Woolwich by regional shopping centres such as Bluewater and Westfield in Stratford. With reports emerging of landlords offering rent reductions to tenants on Hare Street to get them to stay in Woolwich, whether such a large increase in retail floorspace is feasible has to be questioned. Has the document been informed by a commercial property agent or consultancy, and if so what is their view?</p>

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			<p>The Plan says that "There is a need to intensify the uses surrounding the Crossrail station and specifically there is an opportunity for major mixed-use development over the station, which should be pursued in order to begin the intensification process. The station locality will become a key driver for change for Woolwich. In addition, the areas in close proximity to the station will form a major focus for redevelopment." This is surprising, as the site already has planning permission for an above-station development, as a map in the report acknowledges.</p> <p>5.</p>

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			<p>In some areas the Masterplan seems to have been overtaken by events. The old Gala Bingo hall is suggested for conversion back to a cinema: whatever the merits of this, it seems more likely to have planning permission granted for conversion to an evangelical church, so any further document will need to be updated to reflect changing circumstances of such sites.</p> <p>6. The "Spray Street Quarter" (the land between the DLR station and Plumstead Road) was proposed for a major development by Chinese architect Ken Yeang a few years ago. Now it is proposed as a mixed "refurbishment and redevelopment area" with a "fine grain approach" favoured, and key historic buildings retained. While there may be some buildings of historic value here, the majority are not, and the report does make some dubious claims, for example The covered market adds interest to the area with its wide-span roof structure which is an early example of the 'Lamella System'. It is not clear why this "interest" outweighs the benefits of redevelopment. It is not clear how a piecemeal approach will succeed better than wholesale redevelopment to improve the prospects and appearance of this key site directly across the road from the Crossrail station.</p> <p>7. The report defines the "Bathway Quarter" in a bizarre way — as shown on a map it does not include the Town Hall itself, or the listed cottages on Market Street, or the religious buildings on Calderwood Street (now the Sikh Temple), which would logically be included in any new conservation area</p> <p>8. The report says that the car parks on Monk Street and Calderwood Street can be re-clad and possibly have residential units put on top. This is not a convincing proposal, given their age and poor appearance. It would surely be better to seek short-term cosmetic measures, and redevelopment in the medium term. Oddly the Masterplan favours the redevelopment of buildings such as Riverside House (as part of the Beresford Street sites) but not these car parks.</p> <p>9. There is a real risk that without robust assessment of Planning applications, Woolwich could end up with lots of poor-quality development on the sites identified in the Masterplan. The lack of any stated commitment to high quality design of new buildings in the Town Centre is worrying. The section on design appears to be dominated by issues of heritage and conservation, but critical to Woolwich's future will be the quality and design of the new buildings that will emerge in the next decade, in just the same way that the focus on high-quality new buildings in the Royal Arsenal has helped ensure its success. Is the council now planning to set up a Design Panel to assess applications — something that many other London Boroughs have?</p>

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52	Ms Claire Craig	Planning Policy English Heritage - London Region	<p>1.1 As the Government's statutory adviser on the historic environment English Heritage is keen to ensure that the historic environment is fully taken into account at all stages and levels of the local planning process. English Heritage therefore welcomes the opportunity to comment on the four Supplementary Planning Documents (SPDs) currently out to consultation for the Royal Borough of Greenwich.</p> <p>1.2 The Royal Borough of Greenwich contains a rich and varied historic environment, including a range of historic structures, townscapes and landscapes, as well as evidential heritage value in historic and prehistoric archaeology both from the Thames foreshore and inland.</p> <p>1.3 Planning Policy Statement (PPS) 5: Planning for the Historic Environment (2010), policy HE 3.1 requires that, in their Local Development Frameworks Local Authorities set out a "positive, proactive strategy for the conservation of the historic environment in their area". English Heritage supports the production of these SPDs which we hope will help guide development and change to support conservation of the historic environment.</p> <p>1.4 Overall we are pleased to see that the historic environment is addressed through these SPDs with relevant historic context sections in the background information sections. However, we have suggested some amendments below which we believe will strengthen them in regard of their compliance with PPS5.</p> <p>2. Building heights and tall buildings</p> <p>2.1 A significant omission in all of the SPDs is clear guidance on building heights and tall buildings. English Heritage/CABE's Guidance on Tall Buildings (2007) and the 2011 London Plan support a plan-led approach to tall buildings to ensure that they are located to maximise opportunities for good urban design and to avoid harm to heritage assets and their settings. While this approach has been established at a borough-wide level, where each of the SPD areas is identified as an area of tall buildings potential, there is an important role for the SPDs to refine this strategic designation through local masterplanning, and based on a more detailed understanding of the environmental characteristics of each area as required by PPS1. This is crucial for areas such as Woolwich where there is a concentration of heritage assets whose settings could be affected. A useful example to follow in this regard might be the London Borough of Wandsworth Site Allocations document.</p> <p>2.2 We suggest that explicit guidance is provided for each of the SPDs regarding building</p>

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			<p>heights, and possible locations for tall buildings which takes into account any impacts on heritage assets, their settings, the townscape skyline and locally important views. This should be supported with clear urban design evidence, including an understanding of the local historic environment.</p> <p>2.3 In each document it would be useful for the policy review to acknowledge that each SPD area is identified as a location of tall buildings potential, which explains the rationale for providing a building heights strategy.</p> <p>3. Archaeology</p> <p>3.1 Each of the SPDs cover areas designated as Areas of High Archaeological Potential yet archaeology has not been addressed as an issue in any of the documents. The banks of the Thames are particularly rich in archaeological findings due to the intensity of historic activity there, while Woolwich and Eltham Town Centres and the entire Peninsula have a long history of settlement and activity which could yield archaeological remains.</p> <p>3.2 Reflecting the Borough's unusually high archaeological potential we understand that it intends to adopt its draft document London Borough of Greenwich: Areas of High Archaeological Potential Appraisal, containing updated boundaries, character descriptions for each area, and short potential aspects for research. This is clearly a useful document for the purposes of strategic planning and decision making, and should be drawn on in each of the SPDs.</p> <p>3.3 We therefore recommend that Areas of High Archaeological Potential designations be identified in each of the SPDs, as set out in the Appraisal (together with a cross-reference to it), and that their sensitivity to development impacts be highlighted, drawing the character descriptions provided in the Appraisal. In addition, we would suggest that, where development proposals are concerned, the SPDs reinforce and encourage assessment of archaeological potential, reflecting the approach outlined in PPS5 and reinforced by the English Heritage London Archaeology Charter. If they fall within a designated area, applications should contain a Heritage Assessment to cover above and below-ground assets and sites outside of the Areas of High Archaeological Potential of 0.4ha or more in area should also be subject to the same process. If archaeology is a minor consideration then a statement in the Design and Access Statement should show that it has at least been considered.</p>

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			<p>4. Consistency with PPS5 terminology</p> <p>4.1 In each document, to avoid ambiguity it is important to ensure consistency with PPS5 when formulating policies to addressing designated heritage assets, ie to seek to conserve their historic significance. For example, the Woolwich Town Centre SPD (page 100) should address designated heritage assets, and cover all asset types, including archaeology.</p> <p>Borough-wide policy framework</p> <p>5.1 For clarity it would be useful to set out, in the introduction to each SPD, the Core Strategy policies which each SPD supplements.</p> <p>6. Design and heritage considerations</p> <p>6.1 We welcome policies to promote public realm enhancements and high quality design. In doing so it is important to explicitly promote contextually-sensitive design, for example, in terms of materials, heights, typologies, heights, street furniture. This is particularly important where there are higher concentrations of heritage assets, such as in Woolwich Town Centre. English Heritage has provided a range of Guidance documents to show how this can be achieved, notably English Heritage/CABE's Building in Context (2001) and our suite of documents entitled Understanding Place (2010).</p> <p>Woolwich Town Centre SPD</p> <p>9.1 Objectives (page 14): – we welcome the objective to establish a buildings heights strategy for Woolwich Town Centre. However, this does not appear to have been followed-up within the document. Please see our earlier comments regarding tall buildings.</p> <p>9.2 Design and Heritage (page 19): we welcome policies to promote refurbishments and public realm enhancements in Woolwich.</p> <p>9.3 Delivery (page 50): we support the intention to designate Powis Street / Hare Street and the Bathway Quarter as Conservation Areas which will give greater protection to their historic character and significance. We would be pleased to advise the Council as necessary regarding the next steps to this process.</p> <p>9.4 Heritage designations (page 64): the historic western core of the former Royal Arsenal should be identified as a Conservation Area rather than a Core Strategy.</p> <p>9.5 Historic development (page 70): we are pleased to see that the SPD is clearly based on a robust understanding of the Woolwich's historic development, as required by PPS5. For</p>

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			<p>completeness it would be worth making the point, at the start of the paragraph entitled “History” that Woolwich was, and still is, a garrison town, and that its connection to the military extends wider than the Royal Arsenal.</p> <p>Designated historic fabric (p.101): the plan showing Woolwich Town Centre’s heritage assets is welcomed, however, it currently contains a significant number of inaccuracies. These should be rectified in consultation with the Greater London Historic Environment Record. It is also important to ensure that the plan shows all heritage asset types, including registered parks and gardens and archaeological priority areas.</p>
53	Mr David Hammond	Planning and Advocacy Adviser Natural England, London Region	<p>Thank you for your correspondence dated 31 January 2012, requesting Natural England’s views and comments on the above consultation documents. Your letter has been passed to me as a member of the Land Use Services Team for response.</p> <p>Natural England is the Government agency that works to conserve and enhance biodiversity and landscapes, promote access to the natural environment, and contribute to the way natural resources are managed so that they can be enjoyed now and by future generations.</p> <p>Natural England is supportive of initiatives to enhance and improve access to green spaces as well as provision of new green open space provision, especially in areas of deficiency for access to nature. Improvements to and realignment of the Thames Path National Trail, where appropriate are also welcomed and supported.</p> <p>The Masterplan proposals seek to encourage and provide new residential and economic opportunities within the selected areas. As part of sustainable development the Council should also seek to provide sufficient leisure and amenity resources also, new parks and green spaces should be considered, along with improvements and enhancements to existing sites.</p> <p>Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. This should be made more explicit in the Town Centre Masterplans and policies included to ensure the borough’s green infrastructure is designed to deliver multiple functions.</p> <p>The council should consider the role of the natural environment as part of a sustainable developmental approach, together with</p>

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			<p>energy efficiencies. As discussed above, incorporating the natural environment into the built environment can significantly contribute to climate change adaptation including through flood storage, reducing rainwater runoff and ameliorating the urban heat island effect. We recommend that the role the natural environment can play in climate change adaptation is drawn out further in the Masterplans, and policies included reflecting this.</p> <p>The potential for new and additional residential provision within the selected Town Centres/Areas can lead to increased pressure on existing resources, including leisure and amenity spaces Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system:</p> <ul style="list-style-type: none"> • No person should live more than 300 metres from their nearest area of natural green-space; • There should be at least one accessible 20 hectare site within 2 kilometres; • There should be one accessible 100 hectares site within 5 kilometres; • There should be one accessible 500 hectares site within 10 kilometres. <p>This is recommended as a starting point for consideration by local authorities and can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some urban areas/authorities than other, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their Borough.</p> <p>Green Grid and Blue Ribbon</p> <p>The use of the existing natural signature of a borough can be used to help deliver Council objectives. Natural signature refers to the underlying landscape of an area, which if drawn out, can make a direct and powerful contribution to 'sense of place' and local</p>

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			<p>distinctiveness. An example of this can be seen in the Wandle Valley Regional Park which has a natural signature of water meadows echoing the meandering course of the river, backed by bands of wet woodlands.</p> <p>Natural England has recently produced the London Landscape Framework which gives further guidance on the 'natural signatures'. We recommend that you refer to this document and ensure that it is reflected in the appropriate section of the Masterplans. The London Landscape Framework can be found at:</p> <p>http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx</p> <p>The Council should also look at the fragmentation of open spaces and the linking of them back to paths and other sites. This would also be in line with the councils aspiration to promote and encourage pedestrian and cycling opportunities for the Town Centres.</p> <p>Below are general comments that may be of use for potential developments and developers in the areas, and are offered as advice.</p> <p>Local wildlife sites</p> <p>If proposal sites are on or adjacent to local wildlife site, e.g. Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) the county ecologist and/or local Wildlife Trust should be contacted.</p> <p>Protected species</p> <p>If representations from other parties highlight the possible presence, or the Council is aware of a protected or Biodiversity Action Plan (BAP) species on the site, the Council should request survey information from the applicant before determining the application. Paragraph 98 and 99 of ODPM Circular 06/2005 and Paragraph 16 of Planning Policy Statement 9 [1] provide information on BAP and protected species and their consideration in the planning system.</p> <p>We would draw the Council's attention to our protected species standing advice, which provides guidance on when protected species may be impacted by a proposal. The advice can be found at:</p>

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			<p>http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/standingadvice/default.aspx</p> <p>Biodiversity enhancements</p> <p>Application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as those mentioned above. The Council should consider securing measures to enhance the biodiversity of sites from the applicant, if it is minded to grant permission for applications. This is in accordance with Paragraph 14 of PPS9. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.</p>

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1	Mrs Suzie Bailey		<p>The most important question I have is why has TUDOR BARN and the WELL HALL PLEASANCE be sidelined in this proposal. Tudor Barn Eltham is a historic site with a Grade II* listed building but has no mention in the proposal about from the fact that it is in the North of the Town Centre. I was clearly told that the Town Centre would be extended to the Well Hall Roundabout and this has not been highlighted in the proposal. Tudor Barn Eltham has played a VERY IMPORTANT part in giving the local community a safe environment to bring their families and friends and we shall continue to do this work HOWEVER we do need to be recognised as being part of ELTHAM! Tudor Barn Eltham is OPPOSITE ELTHAM BR and soon to be new DLR and as much as Eltham palace is an important historic building in Eltham so too is Tudor Barn Eltham. There is also no mention whatsoever about the ROYAL BLACKHEATH GOLF CLUB which is a Grade I listed building and the oldest golf club in the world!</p> <p>Well Hall Pleasaunce is 13 acres of award winning parkland which spaces to accommodate family fun days, markets, events and it already hosts a number of fantastic days and nights out in Eltham. WHY HAS THIS NOT BEEN TAKEN INTO CONSIDERATION???</p> <p>It is clearly evident that the planners have not done their homework as Tudor Barn Eltham is no longer run as a cafe by Greenwich</p>

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			Council and there are lots of shops and works being carried out at this end of Well Hall Pleasaunce which needs to be highlighted in the proposal - not least the new cinema and complex being build by the Cathedral Group, all the lovely little shops along by Eltham Station - the local community should not suffer just becuase they are located on the wrong side of the street.
2	Mr Matthew Johnston		<p>Looks like interesting times ahead for Eltham. I would be interested to find out the future strategy of the DLR coming to Eltham.</p> <p>There seems to be a number of changes where retail units will have residential homes on top of them, will they have parking allocations, or will they have to fight for parking spaces? What happens to the current town centre whilst the high street gets turned into a building site? Will the works adversely affect Eltham's economy? What mitigations are being put in place so that the current transport links are not adversely affected during works in the high street?</p> <p>I understand that there will be a new multi-storey car park is to be built. Will the capacity be sufficient, particularly with the potential introduction of charging to park on the high street as I can imagine a lot of vehicles will not park there and will seek alternative free places. I cannot say for sure, but I imagine that charging to park on the high street may impact the shops on the high street from those "just passing" customers. If a payment by mobile scheme was to be introduced could a scheme whereby the first 15/30 minutes be free and then a charge be made? That way, those customers wanting to stop, grab and go would still park there and the local traders would not be impacted.</p> <p>I look forward to reading more material and programmes as they become available and will welcome new developments (just hope they don't stall because lack of funding - like the grove development)</p>
3	Mrs Lorena Walpole		<p>The phone and park scheme has not been well thought out.</p> <p>Firstly you assume everyone has a mobile phone and that a signal can always be obtained. You assume people will happily pay for a phone call and a parking charge, effectively being charged twice. You cite that this idea will encourage people to park within restriction times and visit local shops more. You could not be more wrong. Nearly all the areas marked up for these Phone/Park bays are currently free parking, with a time restriction for how long you can park. I work in Eltham town centre and can confirm the current system works well. This is purely a money making exercise, where revenue will be created from a previously free parking area. You will need to invest money in enforcing this system, using computerised checking, which will create expenditure. You will alienate local shops because the cost of a quick stop to shop will double the price of the newspaper you were stopping to buy! Give this more thought, it is not the way forward and a poor idea which will have a knock on effect because people will bypass local shops to go to supermarkets, if you're going to pay that much to park you might as well drive past the local shop and</p>

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			head for the supermarket carpark where it's easier to pay with coins.
4	Mr Marcus Luck	Tudor Barn Eltham	<p>Underwhelming, best describes this effort. Imaginative, dynamic and insightful it is not. The vision for the development of Eltham Town Centre suffers from a frustrating vagueness and reliance on jargon together with the adoption of unexplained assumptions. A vision for the future of Eltham Town Centre requires a really confident grasp of the present and I did not feel that the writers had adequately displayed this element of the brief.</p> <p>The initial artist's impression of the future High Street shows no attempt to separate cycle traffic from other vehicles. Given that one of the stated aims is to encourage walking and cycling I would have thought such separation to be fundamental to any vision of the future.</p> <p>The key aim is to "reveal and reclaim (the) history, and emulate the structure of the historic urban grain..." I think that the second part of the 'Key Aim' must be architect talk; I have no idea what they mean to convey.</p> <p>The Town Centre is more than the High Street it is also about the parades of shops and the environment leading up to it. It is the proliferation of small shops and businesses and green spaces that make shopping in Eltham so interesting. The High Street is dominated by the big players, Lidl, Marks and Spencer, Debenhams, Iceland and at one remove Sainsbury's. That situation is unlikely to change and the fact is that the small independent shops that make such a contribution to the diversity of offer in the town centre are struggling and too often closing. The preponderance of charity shops, bargain and pound shops is a universal feature of modern high streets. So the confidence with which the writers proclaim that the "future Eltham town centre will feature a revitalised shopping offer with a wide range of quality retailers. There will be an improved range of cafés and restaurants, supporting a stronger evening economy in the town centre" is a mystery to me. How do they know? It is good that we should aspire to such a vision but this document needs to be based on and in reality and assertions backed up by evidence. We require a vision not a fantasy. (I note that Dwell appears in the illustration of the Arcade but my understanding of operations such as Dwell is that they appear consistently in shopping malls like Lakeside not suburban high streets).</p> <p>The idea that the Arcade will consist of small independent retailers and creative sector 'start up' businesses I find unconvincing. Yes I would love to see that happen but Second Floor Studios and Cockpit Arts are doing that right now and creating markets in their immediate environments. These creative industries developments do not just happen they grow organically from specific entrepreneurial activity and over time produce 'clusters' of similar businesses.</p>

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			<p>Eltham seems to be quite well served with a healthy selection of independent cafes and lunch time eateries. I do not see any particular trend towards top end restaurants and delicatessens though I should welcome them. Fast food outlets and takeaways are as likely to figure in the future of the town centre as an "improved range of cafes and restaurants". It also lacks good quality hotels and guest house accommodation, no mention.</p> <p>Car parking is to be 'reconfigured'. I remain unclear just what reconfiguring will amount to. Clearing parked cars from one side of the High Street and parking them on the other side in 'chevron parking' is part of the suggested solution. But won't that result in a narrow pedestrian area on one side of the street with a disproportionately large area on the other? What about removing cars from the High Street entirely and providing adequate parking facilities elsewhere. Sainsbury's car park, always full, will be made smaller which I suspect is an example of how they intend to 'reduce the presence' of cars. I question whether that is appropriate. I too would like to see more people using public transport but when I do it is not always a pleasant experience and if I am going shopping I convince myself that I need the car. Selfish but a not uncommon attitude.</p> <p>The reclaiming of the history of Eltham is centred almost exclusively on the Palace. I am not clear whether Eltham turned its back on the Palace or the Palace on Eltham but it does seem to be a somewhat dysfunctional relationship. However, the long and distinguished history of Eltham encompasses far more than the Palace so it is rather ironic that this document that expresses a concern to manifest and celebrate those connections is so narrow in its outlook. Apart from passing historical references to the Tudor Barn there is no inclusion of the Well Hall Pleasaunce and the remarkable Tudor Barn. Well Hall Pleasaunce may not be strictly part of the town centre but it is almost directly opposite the bus and railway station that it is envisaged will give many visitors their first impression of Eltham. Together the Pleasaunce and the Barn constitute a potentially huge visitor attraction, not even a mention of some signage on the railway station platform, bus station stands or on the street. A medieval walled garden and moat with a 500 year old Tudor Barn all set in tranquil award winning gardens and home of the Railway Children to boot, definitely constitutes an attraction to locals and visitors alike. So let's celebrate them and integrate them into the plan.</p> <p>I do baulk at the suggestion of designing street furniture for a 21st century townscape themed on the 1930s. One feels that the writers may have slightly lost the plot here in that the glory of the 20th century extension to Eltham Palace was precisely that it was a remarkable and tasteful celebration of the 'Modern'. Had Allies and Morrison been the architects it would almost certainly have been a mock Tudor or 20th century Gothic extension. Just because we are a Royal Borough does not mean that we have to adopt the architectural values of the Prince of Wales. God bless the Courtauld's and their rare combination of fabulous wealth and good taste but a mosaic version of the round carpet in a dreary shopping arcade NO!</p>

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			<p>What makes Eltham so unique are all those little shops that sell wedding dresses, musical instruments, sort furnishing, décor and the like. They are the 'quality' retailers and their proprietors live locally and probably have done for their entire lives. They know, love and value Eltham, its people, its history and they are passionate about its future. Unfortunately they are struggling in the current economic climate so they are unlikely to be enjoying the 'evening economy'. I assume that the 'evening economy' is people going out for a social drink and to eat but judging by the adverts in the local papers I may have the wrong end of the stick here. It certainly appears that some historic professions are continuing to experience a boom in trade.</p> <p>Car parking will be 'reconfigured' and the High Street will be pedestrianized, well sort of. Links to the train station will be improved by laying more expensive paving. This will incentivise people to walk and use bicycles. Why? How? Safe cycle paths don't get a mention which is surprising because it is a big issue in London right now and will be until someone comes up with an answer.</p> <p>There are in truth many cogently presented cases in the document and as a discussion document it is to be welcomed. But there is so much more that they could have put in and a more radical approach in a draft document would not have gone amiss. I am all for planting trees, where possible, and sustainable transport gets my vote any day but I want more, much more for Eltham.</p> <p>Marcus Luck</p> <p>Director, Tudor Barn Pleasaunce Ltd</p>
5	Mr Patrick Blake	Highways Agency	<p>Thank you for your email on 31 January 2012 inviting the Highways Agency (HA) to comment on the Masterplan Consultations for Woolwich Town Centre, Eltham Town Centre, Charlton Riverside and Greenwich Peninsula West. The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. We have reviewed the Masterplans and do not have any comment at this time.</p>
6	Mr John Webb		<p>ELTHAM TOWN CENTRE CONSULTATION: SUBMISSION</p> <p>The town centre needs radical and ambitious change to fulfil its potential and bring it up to the expectations of current-day</p>

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			<p>shoppers.</p> <p>It currently neither makes a sufficiently good environment to attract a wider range of shops nor creates a hospitable social space. There is insufficient encouragement for shoppers to linger to enjoy the experience.</p> <p>The major barrier to these aspirations is the predominance of motor transport.</p> <p>While there is no alternative to the two-way passage of vehicles, great improvements can be made by addressing the question of parking.</p> <p>There is parking on both sides of the road for its entire length, punctuated by bus stops and pedestrian crossings.</p> <p>The problems this causes are:</p> <ul style="list-style-type: none"> - unsightliness; - danger - congestion - difficulties for those with genuine access needs - hold-ups for buses. <p>The current parking regime is dangerous to:</p> <ul style="list-style-type: none"> - pedestrians;

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			<ul style="list-style-type: none"> - cyclists; - passing vehicles; - the parkers themselves. <p>It promotes dangerous car manoeuvring, reversing and frequent 180 degree turning; pedestrians weaving between parked cars; motorists opening car doors, alighting into busy traffic and parking cars holding-up free passage of vehicles</p> <p>It is largely indiscriminate, with only five bays allocated for disabled parking, most High Street parkers well able to walk the relatively short distances from nearby car parks; and it prevents easy collection and delivery of goods from shops. It comes with signage clutter.</p> <p>The use of substantial strips of the wide road for parking also prevents the widening of the pavements.</p> <p>Wider pavements would allow</p> <ul style="list-style-type: none"> - easier pedestrian movement; - pavement displays by shops; - pavement cafes; - seating; - kiosks; - performance space;

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			<ul style="list-style-type: none"> - trees, shrubs and flowers - informational signage - association space. <p>In short, the existing parking regime prevents a positive softening and transformation of the space which is at the heart of the community. All shops stand to benefit from the improved environment; the cafe culture which is a growing factor in town centre shopping (and is one good/service that can't be provided on-line, also a future growth area) is held back, rather than encouraged by the current arrangements.</p> <p>There would be better access to and movement of buses. Properly enforced pick up/drop down areas could be provided for those with access issues and for taxis.</p> <p>How can we cope without High Street parking?</p> <p>There are only around 70 parking spaces on the High Street between Well Hall crossroads and Christ Church. This equates to a small car park; for example the modest-sized Marks and Spencer car park holds 110.</p> <p>Parking on the High Street is opportunistic. Nobody coming to Eltham could be planning to get a space alongside their chosen shop. The main attraction currently is that it's free and perceived as being convenient, as opposed to circumnavigating Sainsbury's or potentially queuing in Orangery Lane.</p> <p>The possible loss of low-value 'drop by' shoppers spending less than 30 minutes in town will be more than made up for by people coming to the town for longer periods to enjoy the better environment for higher-value trips.</p> <p>Parking on the High Street is mainly used by younger, more mobile motorists. Older people and those with access issues are generally intimidated by the dangerous manoeuvres involved in parking there and exiting to the pavement, and prefer the more user-friendly locations in car parks.</p>

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			<p>Poor parking provision is a major discouragement to people wanting to visit the town. Using the off-street car parks currently involves cramped manoeuvres and queuing (e.g. the nightmare that is Sainsbury's car park, Eltham Centre) and limited and unco-ordinated capacity (Lidl/M&S and Orangery Lane). All these are fairly strong negatives for people seeking to have a lengthy visit to Eltham as a shopping centre.</p> <p>The provision of just 70 more spaces in a nearby location adjacent to the High Street would be sufficient to make good the numerical deficit caused by ending High Street parking. The provision of, say, 500 new parking spaces adjacent to the High Street would take the parking capacity worries out of the 'visiting Eltham' equation.</p> <p>These could be provided by:</p> <ul style="list-style-type: none"> - an extra storey on Sainsbury's; one variant on this would allow the store to expand by extending its current frontage onto park of the existing car park; - an extra storey on Orangery Lane/Lidl/Marks and Spencer with a complete integration/rationalisation of these sites. A possible re-routing of Orangery Lane to run to the north side of the site; - development of the office building recently vacated by the council's social services staff (proposed day care centre) possibly on two/three storeys. This option would allow close and safe pedestrian access to the High Street, coming out at Clinton's. It also allows for major provision, on the level, for a substantial disabled parking provision at its High Street end. <p>Access to Orangery Lane</p> <p>It's proposed in the plan to re-locate Roper Street school to create better access. I personally think that the sight of young children playing in the central location is beneficial for the ambience. Young people don't need to be tucked away from commerce. It helps the 'family Eltham' atmosphere.</p> <p>Possible compulsory purchase of one or two houses to create better access road would be cheaper, quicker and easier.</p>

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			<p>St Mary's Community Centre</p> <p>The Centre would benefit significantly. It would allow the centre to be allocated the wider pavement space in front of the building for seating/association/information/refreshments/stalls.</p> <p>Few visitors to St Mary's currently expect to be able to park on the High Street in the vicinity of the building in the day time as few spaces are available at any one time; in the evening, Sainsbury's is a level and convenient option.</p> <p>Presentation</p> <p>It is recognised that the proposal will require mind-set shifts from local interest groups and the motoring public. Therefore, it is important that the potential benefits of the idea are presented up-front by attractive mock-ups and sketches, also a clear exposition of how parking would become easier with adequate off-street options.</p> <p>JOHN WEBB 3 March 2012</p>
7	Ms Michelle Wyer		<p>11. I think that it is wrong to charge £1 an hour on the high street. It will discourage people from parking to 'pop in' to one of the shops which happens a lot now, we do it occasionally. Indeed the council might want to think about encouraging people into Eltham by making the parking free or very, very cheap.</p> <p>2. I am really angry that there are plans for the sorting office to be taken out of the town centre. At the moment I only really have Saturdays to collect items as I work long hours in central London. Now I will have to get in a car - which is bad for the environment and travel at additional cost to me, [I currently walk or use public transport on my way for a swim on Saturday lunchtimes]. Currently the sorting office is in a good central location for most Eltham people to get to.</p> <p>3. I'm not sure that widening the pavements is necessary. At the moment we do get a lot of traffic through Eltham Town Centre but that's because it is a very well used road. If you take it away the alternative roads will become even more congested than they are at</p>

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			<p>present. I like the current 'old fashioned' High Street feel. I think that pedestrianisation will change that.</p> <p>4. I hope that you won't be removing the access from the back of M&S, by the Orangery, to Well Hall Road. My husband and I currently use that a lot and would be disappointed if it disappeared. It will be nice to see a feature made of the Orangery though as it is a beautiful piece of architecture and currently wasted.</p> <p>5. My main concern, however, is that we've been waiting for ever for the area by the HSBC Bank to be re-developed and nothing has happened. It took ages for the Coronet to be redeveloped - will this redevelopment a] actually happen and b] happen to time - I can't help having my doubts!</p>
8	Mr Gerald Mason		<p>This is an interesting document in terms of giving a bit of history to the area, and some light commentary on the buildings. However, I do have a number of concerns.</p> <p>Firstly, is it a requirement that Greenwich Council have to do this? If not, it certainly seems a rather extravagant exercise.</p> <p>Secondly, I think the document should be clearer about what it is - a vision with absolutely no guarantee of being implemented. This is because I am sure it would be quite nerve-wracking for some to read of their child's school being located, or a multi-storey car park being build behind their home.</p> <p>Thirdly, the document wholly fails to address, even lightly, the economic hurdles that would need to be overcome in order to deliver the vision. Without even a cursory analysis of this it seems hardly credible.</p> <p>In summary, nice pictures, nice read, but just a dream. I hope not a penny more was spent on this than was absolutely necessary to meet the legal obligations of Greenwich Council.</p>
9	Mr Richard Johnson	Beadles Car Showroom	<p>Page 14 of the Eltham plan says "The car showroom and petrol filling station create a poor gateway to Eltham, and are a particularly poor foreground for the Parish Church when approaching from the west".</p> <p>I don't disagree with the sentiment but this 'car showroom' is a full franchised dealership employing 37 people. The plan goes on to suggest that new development of this site is a foregone conclusion; this is particularly worrying for the employees, the site owners and our customers. As site owners we would like to know what time span our current occupation/ownership has and how you</p>

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			intend to acquire the site.
10	Mrs Marion Langham		<p>As we all know, the ageing population is a growing one. I notice a great number of mobility impaired older people in the High Street.</p> <p>I am one of them. Please remember us when making plans for Eltham. I see that plans are afoot to widen pavements in the High Street.</p> <p>I hope that this means that buses will continue to run the whole length of the High Street. More seating would be welcome with notices to the effect that preference be given to elderly and disabled people. I look forward to an even better Eltham.</p>
11	Newman		<p>There is insufficient free parking in Eltham High Street at the moment.</p> <p>I do not support the introduction of pay parking on Eltham High Street.</p> <p>The maximum length for free parking should be 1 hour.</p>
12	Mr J.K. Banner		<p>Any problems with the current parking arrangements are caused by lack of space, which could only be addressed by provision of more car parks, which is probably impossible.</p> <p>I do not agree with the introduction of charging for parking in the High Street; charged parking is available in the Sainsbury carpark.</p>

ID	Full Name	Organisation	Comments
			<p>I do not have a view on the restriction of parking to 1 hour in the High Street.</p> <p>I think the suggestion of making payment exclusively by mobile phone deplorable. All people who use the High Street do not have, nor wish to have a mobile phone.</p>
13	Chris Hunt		<p>I am writing to object to these plans. We should not build any more housing of any type in Eltham. We do not have infrastructure to cope with more people. Our schools are full, our hospitals too, the Post Office is struggling and we have too many cars. We do not need flats because we do not need or indeed want more people. Reverse the massive rise in immigration and resultant massive birth rate rise amongst these areas. Do a proper census of people here and the truth will out. It's like a third runway. By the time it's built we will have realized the railways are a better option and not need any of it.</p>
14	Ms Judy Smith	Old Page Estate Residents Association	<p>On behalf of this Association I write with comments on the Eltham Masterplan.</p> <p>We have always favoured and supported sensible and realistic improvements to make Eltham High Street a more viable shopping centre, and there is much in the masterplan that has the potential to achieve this. We would, however, make the following comments:</p> <ul style="list-style-type: none"> • Eltham High Street development must retain the 3 to 4 storey height already in place. • We would support the redevelopment of the line of single storey shops, but would ask that if it cannot be achieved quickly, the balustrade is replaced urgently to improve the look of that parade. • We must aim for quality design and commend the Mothercare and Next buildings. • We would support a 'Civic Trust' type review to encourage improved shop frontages. • Improvement/extension of Passey Place to make it more of a town square would be good, subject to the Eltham Town Sign being retained. • We need (in effect) a replacement of the Co-op department store to provide 'white goods' (washing machines, fridges, freezers etc), household goods, furniture and carpets so that we don't need to travel out of Eltham to see and purchase them. • In any redevelopment, we need some small outlets at low rents so that Eltham can build up a 'niche' market - eg people come to Eltham because we have specialist shops such as a craft shop, an artists materials shop, a china shop, a picture framer etc., that other retail centres don't have. We used to have all of these, lost to rent increases. • Whatever proposals are put forward for the High Street parking and bus stops, there needs to be through traffic, ie traffic

ID	Full Name	Organisation	Comments
			<p>not held up every time a bus stops (the masterplan talks of bus boarders, which are a build out of the pavement, and that could result in only one line of traffic including the bus).</p> <ul style="list-style-type: none"> • If there is residential development, we need houses, not flats. • If we are to improve the evening economy, we need restaurants, not cafe/take-aways. • We do need better links with Eltham Palace to encourage visitors to the High Street. • Eltham is proud of its history, so any proposals to change Philipot Path and Eltham Church of England School must be considered very carefully and fully consulted on. • If the masterplan is to be successful we will need a proactive, not reactive, planning department. <ul style="list-style-type: none"> • It is very important to improve information at Eltham transport interchange (rail and bus) and it should be remembered that there are two ways to approach the High Street - Archery Road and Well Hall Road. <ul style="list-style-type: none"> • Success with any redevelopment or improvement proposals will depend on ensuring the support of residents, and this will only be achieved by making information available on a regular basis and with full consultation on new proposals, which in effect means more than the statutory planning level of consultation. <p>This Association is a member of South Greenwich Forum, and through the Forum, and as an individual Association, is always ready to take part in discussion of ideas, and ensure there is wide publicity for proposals as they develop.</p>
15	Mr Roger Simmons		<p>Most of the comments are a set of objectives set by a public body involving many private organisations.</p> <p>The report could have been a lot clearer had all the present land holders been identified & their willingness to sell / move been indicated.</p> <p>02 Vision states</p> <p>"The dominance of the car will be reduced and there will be increased space for pedestrians,"</p>

ID	Full Name	Organisation	Comments
			<p>Where are all the cars going to go?</p> <p>Very much a wish list. Who is going to pay for it all.</p> <p>04 Car Parking</p> <p>"..... Royal Borough's depot to the north of the High Street potentially providing a multi storey solution. Is the depot still available?</p> <p>Removing bus lay-by's and bus build outs</p> <p>What happens to other traffic when busses stop at build outs?.</p> <p>Havoc and traffic chaos through the rest of the streets through Eltham when they try to divert. Thus creating further problems.</p>
16	Alan Ekland		<p>This is an objection to the Masterplans Supplementary Planning Document which proposes the erection of a decked car park with integrated residential or office development within Site A, Orangery Square, Eltham SE9 - Phase I - Eltham Town Centre Regeneration.</p> <p>I see from the illustrative Masterplan (Eltham Town Centre Draft Masterplan SPD - Dated February 2012) that a residential or office development will be placed directly behind my property (32 Dobell Road, SE9 1HE) and those of my neighbours in Dobell Road and Archery Road. What I am unable to see from the proposal is the height of the development, however I can see that the illustrations show this to be of a similar height to the Marks & Spencer building. I was unable to visit the library in Eltham to see plans which</p>

ID	Full Name	Organisation	Comments
			<p>were publicly shown on Saturday 3rd March 2012 as I was not aware of this development at this time. I have not received any documentation or correspondence from Greenwich borough council informing me of such development. I became aware of the Eltham regeneration from a neighbour and the implications this would have to us.</p> <p>This has already begun to have an effect, causing stress to myself and family, therefore I would like to object to this proposal and set out my concerns below.</p> <p>The proposal:</p> <p>1. would have an unacceptable dominant and overbearing visual impact on the view from the rear of our property 2. will adversely cause a loss of light, over-shadowing of our property, which will have a negative effect on our demeanor and thus be detrimental to our health 3. would have adverse noise and disturbance impacts, including cumulative impact 4. will overlook our property and severely cause loss of privacy both in our garden and property with bedroom, bathroom, kitchen and living room facing the development 5. would increase pollution to the local environment - which in turn have a significant impact on our health, and the stability of surrounding natural life 6. would have a very negative effect to our property, both financial and our own amenity values 7. would cause security problems for our property due to closeness of the development 8. we already have teenagers which loiter in the car park and feel this would have an increase effect in disturbance 9. construction work would be stressful on our health and well-being due to the closeness of proposed plans</p> <p>The development plans are very vague, the illustrations show the construction to be very close to our property - on the boundary of our back garden, I am sure you can understand we are highly concerned with the implications this will cause us and our neighbours. I would like to register the strongest possible objection to this proposal.</p>
17	Clive Dodd		<p>I am writing to express my concerns at the proposed plans for the development around Orangery Lane.</p> <p>I consider that the proposal to build a multi-story development, including flats, in the area which is currently a car park at the bottom of my garden will reduce my enjoyment of natural light, be an eyesore and take away the privacy which I currently have.</p> <p>When I purchased my property one of its greatest attributes was the fact that it is not overlooked at the rear and I believe that the building of this development will fundamentally change the setting in which my property rests and will have a detrimental effect on its value.</p> <p>Consequently I trust that the views of local residents are properly taken into account when these proposals are being formally</p>

ID	Full Name	Organisation	Comments
			considered.
18	Ms Rose Freeman	The Theatres Trust	<p>The Theatres Trust is The National Advisory Public Body for Theatres. The Theatres Trust Act 1976 states that '<i>The Theatres Trust exists to promote the better protection of theatres.</i> It currently delivers statutory planning advice on theatre buildings and theatre use through the Town & Country Planning (General Development Procedure) (England) Order 2010 (DMPO), Articles 16 & 17, Schedule 5, para.(w) that requires the Trust to be consulted by local authorities on planning applications which include ' <i>development involving any land on which there is a theatre .</i> '</p> <p>We only have a few comments to make concerning future entertainment provision in these four areas.</p> <p><i>Eltham</i> : Site D – we note the suggestion for the Roper Street School site to incorporate gallery space with theatre use or a community centre (which could also provide theatre use). Please keep us informed and consult us if a theatre function is planned.</p>
19	John Babb	Vice Chairman Eltham Park Residents Association	<p>The Eltham masterplan presentation was very good. But my association was concerned of some of the future proposals.</p> <ol style="list-style-type: none"> 1. The proposed future of the site of Eltham sorting office. This prepares and delivers letters to Eltham and Lee. Also used for parking of Royal Mail vans. 2. The future buildings in Eltham High Street should be no higher than two storeys high, example Next and Mothercare 3. Concern of further wider pavement, could lead to traffic problems (hold up) in Eltham High Street 4. It was also stated of more restaurants in Eltham at presents it is becoming there is more restaurants than shops 5. Concern of the high rents, shops has to pay. In the past, shops have been forced out because of the high rents (butchers, halss chine and stationary shops) 6. Before any of the masterplans for Eltham come into force, perhaps the Grove Market Site and the future plans of this site should be completed. Building plans has been agreed but no action taken. This site is a eye sore. 7. It was mentioned to travel from Eltham station to Eltham Palace could be hardship for pensions and disabled people. I would like to point out it is only 10 to 15 minutes walk to the palace and there are many buses from the station to Eltham church and few minutes walk to the palace. 8. I did not quite understand the future of Gaumont at Eltham or the future of the site of Cooperative in the High Street. If these sites in the future will be on for residential home. <p>There was many positive ideas for the future of Eltham, improvements of Passey Place, future shops adjacent to Sainsburys.</p>

ID	Full Name	Organisation	Comments
			The chappie who presented the masterplan was very good and concise. In my opinion the presentation time of one hour was not long enough and not enough time for discussions.
20	Mr Paul Webbewood		<p>Thank you for inviting comments on this document. It is good to see Greenwich Council giving so much attention to Eltham and the Masterplan is certainly an impressive and stimulating document. However before I make any substantive comments I have a couple of grumbles:</p> <ul style="list-style-type: none"> • It is a great pity that the Council has refused to make hard copies publicly available. I suspect that I am not the only person who prefers to work from a paper document rather than on-line and the lack of this may inhibit comments from residents. I would not have objected to being charged a reasonable amount for a hard copy. • Richard Dawkins is unlikely to read the document. It is therefore safe to call Eltham Church of England Primary School by its proper name rather than the euphemism of "Roper Street". <p>Objectives</p> <p>I agree with all the objectives listed on Page 9. My support for the objective of increased density is conditional on no building fronting the High Street being any higher than the Alders building.</p> <p>I would add another objective, that of supporting small and medium-scale office development within the Town Centre. People working in these will be potential customers for Eltham's shops and restaurants.</p> <p>Traffic</p> <p>I do not believe that the car is unduly dominant in the High Street. The relationship between car and pedestrians is in fact rather well balanced at present with pedestrians easily being able to cross the road safely. There may be a case for an additional set of traffic lights east of the Fire Station.</p> <p>Page 40 of the document rightly identifies one of Eltham's strengths as being the amount of accessible and easy to use car parking close to the main shops. It is important not to jeopardise this by restricting the amount of short- term free car parking on the High Street. I would oppose any proposal to narrow the High Street and I do not feel that narrowness of pavements is a major problem.</p>

ID	Full Name	Organisation	Comments
			<p>This is my major area of disagreement with the document.</p> <p>Development Framework - specific locations</p> <p>This section is a very interesting read and none of the proposals are outrageous. In some places though I feel the document risks throwing out the baby with the bathwater.</p> <p>Some of the current activities which are proposed for expulsion from the Town Centre - Bingo Hall, Petrol Station and Car Showroom, BT Offices, Royal Mail site - either provide employment or provide a needed service or both. In particular it is greatly in the public interest that people can pick up packages from the Royal Mail facility in the Town Centre rather than having to drive to an out of town depot. It would be interesting to count how many people use this facility, especially on Saturday mornings, many of whom might not otherwise come into Eltham.</p> <p>I find the western aspect of Eltham Church quite attractive, the garage and car showrooms don't impinge on it unduly. In contrast the shacks on the Well Hall Rd side could usefully be removed, thus improving the Church's eastern aspect.</p> <p>The picture on Page 22 of how the Arcade might look is slightly alarming. Although the Arcade might well require some refurbishment it shouldn't be gentrified to such an extent where the landlord feels able to increase rents to a level which deters small and new businesses.</p> <p>One location which is not discussed is the "Water Board" site towards the eastern end of the High Street. The aerial map on Page 4 shows just how large this is. It contributes little to the Town at present. I do not know whether it would be feasible to relocate it but the site is ideally suited for low rise housing.</p> <p>Eltham Regeneration Board</p> <p>The document says (page 24) that this body will have an important role to play in the future of Eltham. The Board is currently rather secretive and over- dominated by property developers. It needs to expand its membership to include local businesses, ward councillors and community groups.</p>

ID	Full Name	Organisation	Comments
			<p>Bus Services</p> <p>The document states (page 40) that the bus services are very good. This is partly true but it should be pointed out that links to the north are less good than in other directions. There is no direct service to Plumstead or Thamesmead and there is no route taking the most direct route between Eltham and Woolwich.</p>
21	Mr Francis Eastwood		<p>If this plan is to go ahead it is essential that the provision of parking is addressed comprehensively and in the early stages. It is no use pretending that the car doesn't exist, and that shoppers will not want to use this method of transport. Everyone, Council and businesses alike, need to be doing everything in their power to encourage shoppers into our local town centres, and discouraging shoppers who drive is not the way forward. The recent (temporarily withdrawn) consultation on parking charges in Eltham is a magnificent example of the Council's complete lack of understanding of, and sympathy for, the needs of the businesses in Eltham, and smacks of a cynical effort to drive up revenue at the cost of even more empty shops in and around the High Street. (One of the main reasons cited was lack of enforcement of the current system of 30 minute free parking. I have an easy and cheap solution - ENFORCE the current system, which works well!!!) All of the businesses in Eltham are doing their part to encourage shoppers in whatever way they can. Come on Greenwich - live up to your motto of "We govern by serving" and work WITH the locals rather than against. Talk to the business owners and treat them like adults - you may be surprised to find that most of them are intelligent human beings who could offer constructive help. Many of them live in the locality as well as work there, and have a love and passion for the area.</p> <p>Francis Eastwood</p> <p>Owner - Normans Music</p> <p>I am all in favour of improving the High Street and making the environment and the shopping experience more pleasant for everyone, but parking must be tackled in a fair and sensible way as a foundation for the future, not an afterthought in five years time.</p>
22	Mrs		The idea of a plan to revitalise shopping with high quality retailers is excellent, but reducing car access will not encourage shoppers

ID	Full Name	Organisation	Comments
	Lesley Corti		<p>to Eltham, and hence will not encourage retailers. While it is a good thing in principle to encourage people to walk, use the bus or cycle it doesn't work for shoppers. They want a convenient way of carrying their purchases home – and walking, cycling or public transport doesn't offer this. If there are high parking charges and limited parking, people will go to Bluewater where the parking is free and large. We need to increase car parking spaces and reduce the price, particularly at key times like Christmas. With increased usage the revenue will increase whereas putting the price up merely reduces the number of people who come into Eltham, thereby reducing car park revenue and impacting on the shops' revenue. It is simply a case of diminishing returns.</p> <p>Eltham needs to concentrate on niche shopping; help should be given to encourage independent retailers through lower rents/rates and more rather than less free parking available. The existing free parking for half an hour is fine as the limited time encourages increased footfall and more people to use it. The free parking is widely used (it is not always easy to find a space) and encourages shoppers. Restricting the number of charity shops, “bargain” shops and gold/pawnbrokers would also help Eltham, but rates and rents need to be lower to help new businesses start. How many businesses have closed/moved out of Eltham in recent years because of the high level of rents/rates?</p> <p>Leisure, cultural and community – there is already a Community Centre (St Mary's in the High Street) plus the Eltham Centre. Does the High Street need more?</p> <p>Why is there no mention of the theatre in Eltham? There should be good signage and encouragement of this local facility, particularly when mentioning evening economy. Encouraging good quality restaurants for the evening is good but not to the extent reducing space for shops – but again, reducing charity shops and pawnbrokers would free up some outlets.</p> <p>Similarly, there is no mention of opening up accessibility to Well Hall Pleasaunce and the Tudor Barn, both major historical sites in Eltham.</p> <p>There is much talk of building flats and increasing the residential areas within the High Street. Whilst housing has its place, this seems to go beyond that and the High Street should be a place primarily for shops and services. The better a shopping centre is, the more people will use it – the 'virtuous circle' - and the opposite is equally true. A 'better' shopping centre is one that offers more and varied shops and easy accessibility.</p> <p>Increasing the number of residents in an area significantly over a short space of time also changes the ethos of the town and it</p>

ID	Full Name	Organisation	Comments
			<p>becomes a “new” town rather than building on the strengths and history of the existing one.</p> <p>Relocating the primary school seems contrary to retaining the history of the town – it has been in existence for a very long time and also encourages footfall in the High Street.</p> <p>Open Spaces – yes, it would be nice to have somewhere for a larger market, but I do not agree with widening the pavement and restricting the width of the High Street for traffic, the resulting bottleneck will just deter people from coming into Eltham at all. There is no viable alternative to using the High Street both for access to the shops and for through traffic, and reducing the road width will merely cause increased congestion. There are already enough crossings and adequate current width for people to feel safe shopping and crossing the High Street.</p> <p>One suggestion in the plan is making the junction of Well Hall and the High Street a “gateway” - this isn't the start of the shopping – there are many good shops down Well Hall Road, ditto down Court Road and past the Church downs as far as the White Hart pub and then back up certainly as far as Footscray Road, if not up to Southend Crescent. No mention has been made of these and how to integrate them.</p> <p>The sketch plan for St Mary's Place looks good, but seems to imply that the shops opposite are rebuilt as are the existing shops in St Mary's Place.</p> <p>I am concerned that the Masterplan for Eltham concentrates solely on the High Street – Eltham is far wider than that and the plan should include all the smaller shopping parades and consider how they can be helped, rather than leaving them to struggle alone in these uncertain economic times.</p>
24	Mr David Poole	Manager Royal Mail	<p>We are instructed by our client Royal Mail Group Ltd (referred to herein as ‘Royal Mail’) to submit representations to the above Eltham Town Centre Draft Masterplan SPD.</p> <p>I. BACKGROUND</p> <p>Royal Mail, formerly Consignia Plc, is the successor to the former statutory corporation, The Post Office. Although its management operates independently, Royal Mail is wholly owned by the Government through the Secretary of State for Business, Innovation and Skills. Its services are regulated by Ofcom. Its letters business, Royal Mail, is the operator of universal postal service functions through the Royal Mail letter post delivery and collection services handling</p>

ID	Full Name	Organisation	Comments
			<p>letters, postal packets, and high value (registered) packets. Royal Mail Group also operates Parcelforce Worldwide, which is a parcels carrier. Post Office Ltd (a wholly owned subsidiary of Royal Mail) operates the national network of post offices and sub post offices.</p> <p>The United Kingdom letter post business has been fully liberalised since the Postal Services Act 2000 and Royal Mail now operates in a highly competitive market place. As such, it effectively operates like any other business and is continually seeking to find ways to improve the efficiency of its business (e.g. increased automation) and respond to the changes in communications technology (e.g. email and internet). Put simply, the nature of the mail industry has and continues to change and Royal Mail's real estate needs to respond accordingly.</p> <p>Royal Mail have a number of sites within the administrative boundary of the Royal Borough of Greenwich. Our representations relate specifically to Royal Mail's Eltham and Lee Delivery Office (DO)/ Franchise Post Office (FPO) located at 31-33 Court Yard, London, SE9 5DD. It should be noted that the aforementioned site is operational. As such, should any of the properties surrounding Royal Mail's site be redeveloped, it would be vital that any new uses be designed and managed so that they are both cognisant of and sensitive to Royal Mail's operations.</p> <p>2. REPRESENTATIONS</p> <p>Royal Mail generally supports the Council's vision and strategic objectives to transform Eltham Town Centre in to a "quality and liveable neighbourhood" and to revitalise the High Street.</p> <p>2.1 Eltham and Lee DO/ FPO</p> <p>We note that Royal Mail's Eltham and Lee DO/FPO is identified as development opportunity site 4 within the Masterplan. We note the proposals for the development opportunity site include the following:</p> <p>"The site is appropriate for residential development, with elements of retail and other mixed use along the parts of street frontage relating to the High Street and Philipot Path. Any redevelopment of the site should also encompass the provision of small rear gardens for the terrace of houses which run north south within the area down Elizabeth Terrace and presently have their gardens in front of them, across a public lane. This normalisation would in turn help to unlock a more significant remodelling of the adjoining Argos block".</p> <p>Whilst we recognise the realistic development opportunity presented by our client's site and support the designation of the Eltham and Lee DO/FPO for residential-led mixed use</p>

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			<p>development, it is essential that the Council recognises that Royal Mail's site is operational. We would also like to inform the Council that it is not currently the intention for Royal Mail to vacate their site.</p> <p>The site currently provides a sorting office. It operates between 05:00 – 14:00 Monday, Tuesday and Saturday, 05:00 – 20:00 Wednesday and 05:00 – 14:30 Thursday and Friday, providing a postal service to east London covering SE9 postcode areas.</p> <p>As such, should Royal Mail's site be brought forward, the re-provision / relocation of Royal Mail's operations will be required prior to redevelopment of the site. This will ensure that Royal Mail's operations will not be prejudiced and they can continue to comply with their statutory duty to maintain a 'universal service' for the UK pursuant to the Postal Services Act 2000.</p> <p>Furthermore, we note that in order for Royal Mail's site to be brought forward for redevelopment, relocation will need to be viable for and commercially attractive to Royal Mail. The proceeds from the disposal of their site will need to yield both sufficient value to fund the purchase and fit-out of a new site and the relocation of their operations thereto. There will also need to be commercial attractiveness that would incentivise the business to relocate the operations. In addition, it would be essential that any new facility is provided prior to the demolition of the existing and/ or suitable temporary accommodation provided, if necessary, to ensure the continuity of service.</p> <p>We therefore request that the Council includes Royal Mail's Eltham and Lee DO/ FPO site within the Eltham Town Centre Masterplan for residential-led mixed use development, supported by an appropriate flexible policy requiring the re-provision/ relocation of Royal Mail's operations prior to redevelopment.</p> <p>2.3 Policy Considerations</p> <p>The requests set out above accord with:</p> <ul style="list-style-type: none"> ■ Para 10 of Planning Policy Statement 3 (PPS3): Housing, which states that the planning system should deliver "a flexible, responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously-developed land, where appropriate"; ■ Para 36 of PPS3, which states that "in support of its objective of creating mixed and sustainable communities, the Government's policy is to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure. This should be achieved by making effective use of

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			<p>land, existing infrastructure and available public and private investment”;</p> <ul style="list-style-type: none"> ■ Para 44 of PPS3, which identifies that “in developing their previously-developed land strategies, Local Planning Authorities (LPAs) should consider a range of incentives or interventions that could help to ensure that previously-developed land is developed in line with the trajectory/ies. This should include...considering whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development”; ■ Para 54 of PPS3, which requires sites to meet the following tests: <ul style="list-style-type: none"> ▪ Suitable: The site would offer a suitable location for development and contribute to the creation of sustainable mixed communities on previously developed land; ▪ Available: The site would be available for development within the plan period, subject to the suitable re-provision/relocation of Royal Mail’s operations; and ▪ Achievable: Development could be delivered on the site within the plan period; ■ Planning Policy Statement 4 (PPS4): Planning for Sustainable Economic Development, which details that LPAs should plan positively and proactively to encourage economic development, in line with the principles of sustainable development. In particular, PPS4 states that LPAs should develop flexible policies which are able to respond to economic change and notes the need for co-ordination with infrastructure and housing provision; and ■ Para EC.2 (d) of Policy EC2 (Planning for Sustainable Economic Growth) in PPS4, which states that LPAs should “seek to make the most efficient and effective use of land, prioritising previously developed land which is suitable for re-use”. <p>Further, we note the Government’s draft National Planning Policy Framework (NPPF), which is the most up-to-date statement of national policy, albeit in draft form. In particular, we note that it:</p> <ul style="list-style-type: none"> ■ states that development management should “foster the delivery of sustainable development, not hinder or prevent development”; ■ requires investment in business “not to be over-burdened by the combined requirements of planning policy”; ■ requires local planning policy to “have a clear understanding of business needs within the economic markets operating in and across their area”; and ■ requires LPAs to “avoid unnecessary conditions or obligations, particularly when this would undermine the viability of development proposals”.

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			<p>We reserve the right to amend or supplement these representations at a later date if necessary. We look forward to receiving confirmation that Royal Mail's representations have been received and duly registered. In addition, Royal Mail would welcome the opportunity to meet with the Council to discuss the future of the site and be most grateful if the Council would keep us updated as to the progress of the Masterplan SPD.</p>
25	Sandie and Andrew Scott		<p>Thank you for giving us the opportunity to comment on the masterplan for Eltham Town Centre. We took the opportunity to attend the very interesting presentation in the Ettham Library last Saturday and have some views that we would like to voice.</p> <p>As residents of Eltham we are very excited about the new development and love the idea of an increase in cafes, restaurants and better shops and the improvement of the great historical sites that we are so lucky to have on our doorstep and are not currently not shown off to their best.</p> <p>However as we live in Dobell Road we will be affected by the Orangery development, we see that there is a plan to build flats in the existing car park at the end of our garden. We would like to seek assurance that both height and design of the build are taken into consideration when it comes to planning. We currently have a lovely outlook and are concerned that if the buildings are too high, it will affect the light and view of our garden and we certainly don't want to be overlooked.</p> <p>Whilst we appreciate that the plans are in the very early stages, we would like to our points to be considered and for us to have assurance that we will be consulted throughout the process.</p>
26	Ms Judith Cooke	Planning Liaison Officer Environment Agency	<p>Thank you for consulting the Environment Agency on the draft Eltham Town Centre Masterplan Supplementary Planning Document dated February 2012. We support your vision to reduce the dominance of the car and to improve sustainable transport links and public open space.</p> <p>The key issues and opportunities for the Environment Agency in this location are as follows:</p> <ul style="list-style-type: none"> § sustainable drainage; § groundwater protection and contaminated land; § improvement of walking/cycling links;

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			<p>§ provision of green open space.</p> <p>We have set out our detailed comments and provided further sources of information in the following sections appended to this letter:</p> <p>Section 1 – Detailed comments</p> <p>Section 2 – Sources of information</p> <p>We hope our response is constructive and clear. Please contact me if you have any questions or if you would like a meeting to discuss our response or any other issues.</p> <p>Yours sincerely</p> <p>Miss Judith Cooke</p> <p>Planning Liaison Officer</p> <p>Direct dial 020 7091 4002</p> <p>Direct fax 020 7091 4090</p> <p>Direct e-mail judith.cooke@environment-agency.gov.uk</p> <p>Section 1 - Detailed Comments</p> <p>Sustainable drainage</p> <p>It is important that SUDS are considered on a master planning scale if better opportunities are not to be missed. We would ask that</p>

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			<p>the London Plan and London Plan Sustainable Drainage SPG as well as the Greenwich SFRA is built upon to achieve best practice surface water drainage for Eltham considering the Suds hierarchy</p> <p>The Flood and Water Management Act 2010 will introduce far-reaching requirements for SUDS on future construction work. When the commencement order takes effect, applicable construction works will not start until drainage systems have been approved by 'Approving Bodies' in line with national standards for SUDS. The existing right to connect surface water drainage systems to public sewers (under Section 106 of the 1991 Water Industry Act) will be restricted to those approved under the new regime, i.e. appropriate SUDS.</p> <p>Approving Bodies (the local planning authorities) will be obliged to adopt all approved drainage systems except those on single properties and public highways. Road drainage will be adopted by Highways Authorities, as now, but design, construction and maintenance must be in line with the new national standards. This will therefore impact on how development in the town will be implemented.</p> <p>The Act applies to any construction work that creates a building or other structure, including "anything that covers land (such as a patio or other surface)", that will affect the ability of land to absorb rainwater. In other words all new buildings, roads and other paving, whatever the size, type or scale of the project, will be affected – as well as alterations that have drainage implications</p> <p>The Flood and Water Management Act 2010 requires that all new sewers/lateral drains are adopted by the Water Companies. Existing private drains and sewers were adopted from 1 Oct 2011. Developments with new sewers are now required to enter into an adoption agreement under the Water Industry Act 1991.</p> <p>Developers are expected to produce detailed drawings, manhole schedules and sections together with drainage calculations to the Unified Build Standard issued by DEFRA. This standard is expected to be incorporated into the forthcoming Sewers for Adoption 7th Edition which will also cover pumping stations.</p> <p>Sewers should include adequate clearance from adjacent buildings to allow for future access for maintenance and structural integrity of the sewer. Careful routing of the drainage network would minimise the requirements for Easements and Building-Over agreements.</p> <p>Groundwater protection and contaminated land</p>

ID	Full Name	Organisation	Comments
			<p>The presence of a shallow groundwater table in the underlying aquifers (exploited historically for the Eltham Palace water supply) demonstrates that there needs to be careful consideration of sustainable drainage designs for some of the proposed developments. The Environment Agency has a duty to prevent the direct discharge to groundwater of both hazardous substances and polluting concentrations of non-hazardous substances. By ensuring that major developments in this area place responsibility on developers to manage drainage sustainably, this Masterplan can positively influence local groundwater quality and manage risks of surface water flooding.</p> <p>Whilst the nature of historic development has limited the risks of contamination of land there are some sites mentioned in the Masterplan that will need particular attention in order to address potential groundwater contamination risks. These are the Royal Mail sorting office site, and the former car showroom and petrol filling station at the Eltham Hill site. Both will need to be accompanied by appropriate levels of contamination assessment to ascertain what risks are posed to groundwater in local aquifers and what remediation may be necessary to allow sustainable development.</p> <p>Improvement of walking/cycling links</p> <p>The Masterplan offers an opportunity to improve and promote cycling and walking by:</p> <ul style="list-style-type: none"> • Promoting the Green Chain Network as a cycling and walking route. There is need to seek and secure improvements and new links to the network as part of new development and regeneration. • Exploring ways to reduce pedestrian and cycle congestion • Promoting walking across the town centre with new signposting e.g. with distance and average times to key destinations. For example during suspension of underground services pedestrians are often unaware of walking routes and short distances between destinations. • Securing “first class” facilities and storage to encourage cycling <p>Provision of green open space</p> <p>We see development as an opportunity for the green spaces to become a major educational and community resource. Providing new and attractive green grid style development, improving entrance ways and knowledge of parks, enhancing and possible extension of the existing green spaces, would be welcome development.</p>

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			<div>Section 2 – Sources of information</div> <p>We collect key evidence for information and influencing plans. This information covers a wide range of environmental issues and opportunities and can be used to influence the policies and implementation of local plans.</p> <div> <div>Sustainable construction</div> <div> http://www.environment-agency.gov.uk/business/sectors/136252.aspx </div> </div> <div> <div>Environment Agency State of Environment Report for Greenwich</div> <div> <p>Highlights environmental facts and data for Greenwich (November 2011)</p> http://www.environment-agency.gov.uk/static/documents/Research/Greenwich_2011.pdf </div> </div> <div> <div>Environment Agency Adapting to Climate Change strategy</div> <div> http://publications.environment-agency.gov.uk/pdf/GEHO0709BQBW-e-e.pdf </div> </div> <div> <div>Environment Agency Creating a better place Strategy</div> </div>

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			http://publications.environment-agency.gov.uk/pdf/GEHO1109BOXG-e-e.pdf
			<p>Other useful strategies</p>
			<p>Drain London Project</p> <p>Drain London will aim to manage and reduce surface water flood risk in London by improving knowledge of the surface water drainage system and identifying areas at greatest risk of flooding.</p> <p>http://www.london.gov.uk/drain-london</p>

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27	Berkeley Homes	Senior Planner Berkeley Homes (Urban Developments) Ltd	Subject / Site / Page: Vision (page 9)	Topic: <p>‘In the future Eltham town centre will feature a revitalised shopping offer with a range of high quality retailers. There will be an improved range of cafés and restaurants, supporting a stronger evening economy in the town centre.</p> <p>The town centre will benefit from an enhanced High Street with an improved public realm and streetscape.’</p> <p>‘Links to the train station will be improved to encourage the use of public transport, along with a possible new DLR station.’</p> <p>‘Through the enhancement of the public realm, the provision of new housing, and the consolidation of commercial and community uses, Eltham will thrive as</p>	Berkeley Homes Comments: Berkeley Homes supports the vision in general.

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				an attractive neighbourhood in an accessible suburban location in south-east London.'	
			Development Principles (page 10)	<p>Residential:</p> <p>Residential uses within the town centre will be encouraged in order to intensify its use.</p> <p>Leisure, Cultural and Community:</p> <p>The offer of leisure, culture and community uses within the town centre should be widened and sites should be identified for these uses where possible.</p> <p>Intensification:</p> <p>At present, Eltham town centre is relatively low density. Where appropriate, the density should be increased, to intensify its use whilst respecting the scale and character of the historic environment. This will help provide opportunities for more residential</p>	<p>Berkeley Homes supports this approach.</p> <p>Berkeley Homes supports this approach.</p> <p>Berkeley Homes supports the</p>

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			<table><tr><td></td><td>development in the town centre, as well as increased employment opportunities.'</td><td>aspiration to intensify the town centre.</td></tr><tr><td>Best of Eltham (page 40)</td><td>Leisure and health facilities: The opening of the Eltham Centre was an improvement to the provision of leisure facilities in the town centre and is an asset for Eltham.</td><td>Berkeley Homes supports this recognition.</td></tr></table>		development in the town centre, as well as increased employment opportunities.'	aspiration to intensify the town centre.	Best of Eltham (page 40)	Leisure and health facilities: The opening of the Eltham Centre was an improvement to the provision of leisure facilities in the town centre and is an asset for Eltham.	Berkeley Homes supports this recognition.
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Best of Eltham (page 40)	Leisure and health facilities: The opening of the Eltham Centre was an improvement to the provision of leisure facilities in the town centre and is an asset for Eltham.	Berkeley Homes supports this recognition.							
28	Spencer Drury	Councillor - Greenwich Council	<p>Vision (02)</p> <p>We would like to see a stronger emphasis on encouraging independent retailers into the town centre. At present the vision seems to us to suggest a focus on chains and we would like to see specific mention of micro or small businesses.</p> <p>At present we consider that the DLR station mentioned is highly unlikely to exist at any point in the future and believe that a more realistic plan has to be developed if this is to become a reality.</p> <p>Objectives (03)</p> <p>Some areas of concern exist around the precise details with regard to the consolidation and reconfiguration of the backland parking sites. Usage has fallen currently as the prices have risen, which might well be the deciding factor here.</p> <p>The idea of the Orangery becoming a cultural focal point is one which we would fully support. This is a much underused landmark (treasure some might say).</p> <p>Eltham Conservatives have serious concerns about the objectives related to increased density on the High Street with its aim to add more residential accommodation in taller buildings (with the reference to 'building heights are currently lower than average'). We</p>						

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			<p>consider these two objectives should be removed from the master plan as they are not widely agreed upon within the community.</p> <p>I am concerned that the comments about Philipot Path are unclear. What is the intention here.</p> <p>The move of the primary school requires much wider consultation than this document. Have the school been spoken to about this objective? If not it should be withdrawn or a specific comment sought from them as part of this consultation process.</p> <p>Development Principles (04)</p> <p>As mentioned previously we disagree fundamentally with the sections on residential and intensification. While our town centre does have a range of problems, in our view none of them would be addressed by increasing the number of houses/flats or tower blocks.</p> <p>The welcoming gateways section raises an interesting point. There used to be five gateways to Eltham which the current Council have allowed to decay. Reinstating and restoring these is essential if Eltham is to be presented to visitors in the best possible light.</p> <p>On car parking, there can be few town centres around the country who plan to “reduce their (<i>car parks</i>) presence”. This seems to us to be a perverse aim, which may well have the impact of reducing the accessibility of the town centre and so undermine whatever aims exist to help business in the High Street.</p> <p>We absolutely support the development of more sustainable modes of transport, especially bicycle, which the lanes of Eltham may well be suited to supporting.</p> <p>While we do understand the idea of increasing the width of pavements, we do have concerns that this will result in the removal of parking from the High Street itself, which will reinforce the difficulty cars might have in parking in our town centre.</p> <p>We are disappointed that the maps of the town centre on pages 11 and 12 do not include the small parade of shops just beyond Westmount Road and fail to include the redeveloped Eltham Conservative Club, which has ambitions to act as a conference centre in addition to its traditional role. We believe that the Westmount Road shops and Eltham Conservative Club should be included as part of this plan.</p>

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			<p>Development Framework (05)</p> <p>On the specific sites mentioned in your development framework, I think it is important to state that we are concerned that the ideas are too doctrinaire and the removal of Argos, Mecca Bingo and the Royal Mail sorting office would all be to the detriment of the town centre and should be discouraged rather than actively planned for.</p> <p>To go through the sites in order:</p> <ol style="list-style-type: none"> 1. Mecca Bingo – The idea that this should only be a residential development should Mecca Bingo go seems too restricting and we would like to see a more open-minded approach from the Council rather than a simple determination to simply build more flats. 2. Eltham Hill – The newly refurbished petrol station is one of the few in the area and is regularly packed. To remove the petrol station will remove an important facility which draws customers to shops at the western end of the High Street. Similarly I am not sure what discussions have taken place with the car showroom, but they should be specifically asked to contribute to this consultation. We suggest that instead the plan treats the Yorkshire Grey roundabout as the gateway to Eltham and aims to revitalise that rather than move these two businesses. 3. Eltham Palace – We broadly agree with this section (although please note our previous comments on the DLR). 4. Royal Mail Sorting Office site – If this facility should become available, we consider that the vision described here is too focused on residential development. Might this be a space for the market area which it was suggested Eltham needed in the vision? A more creative use for this site than more flats should be considered. 5. Argos Block – Has this been discussed with Argos? I hope that they will be approached to make a specific contribution to this consultation. 6. Passey Place – Some sensible points here, but once again, there needs to be some specific consultation with the businesses in Passey Place. A lot of their current business relies on cars stopping, popping in to the shops and leaving again. Will this be possible if it is pedestrianised? Also as our Group Leader was once a resident in the flats above the shops, he would like to

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			<p>know which parking spaces would be allocated to those residents?</p> <p>7. Eltham High Street – The parking strategy described seems likely to substantially reduce the amount of parking available and (together with the bus build outs) may well cause congestion on the High Street. Residents in Archery Road, North Park, Gourock Road, Blunts Road and other adjacent streets will need to see clear analysis of the impact of the narrowing of the High Street before it could go ahead. Similarly, I am sure that the Eltham Town Centre Partnership will be interested to comment on a more detailed design in this case.</p> <p>8. Orangery Square – This is a very complex set of plans which probably require a separate planning document in their own right, rather than a page in this plan. There is no disagreement with the general statement of the problems existing in this area, however, we have serious concerns about the solutions/vision proposed.</p> <ul style="list-style-type: none"> a. Once again the focus on increased residential seems to be mistaken to us, and the plans for a decked car park (multi-storey I think they used to be called) are mistaken. Removing the Council car parks would be a mistake and would have a detrimental effect on the number of people visiting the High Street. We oppose this sections proposals, with the exception of the ideas for the Orangery itself. b. We consider that yet more flats on the BT site reflects a limited, some would say lazy, vision for the town centre and we would like to see a much broader set of idea for the site, properly integrated into plans for the Orangery site. c. We are interested in these proposals, not least as we were not aware that the Council owned all of these shops. Once again the suggested height of buildings is a concern, but the idea itself of having bigger units here is an acceptable one. d. As mentioned previously this appears to be a big upheaval for the school which needs to be fully consulted on the proposal. In honesty for the very broad, general vision described for the site, we do not consider even the general idea of moving Roper Street school as worthwhile. A more detailed, inventive plan is required to link the Eltham Centre with the Orangery as a space and with pedestrian or bicycle flow through. This plan does not achieve that and does not seem worthwhile as a result. <p>9. The Arcade – Broadly agreed as this is a much undervalued and underused resource which could and should be improved.</p> <p>10. St Mary's Place – Some interesting ideas here but it is hard to envisage precisely what is being described in the plans. I think</p>

ID	Full Name	Organisation	Comments
			<p>more detail could be needed, but as a general statement of intent, these plans are not completely objectionable. Once again the businesses and residents directly affected should be approached to ensure they respond and inform this consultation process.</p> <p>Delivery</p> <p>As we disagree with large chunks of the plans, we consider that the delivery schedule must be faulty and needs to be reviewed. We are also interested to note that the 'Eltham Regeneration Board' will play an important role in delivery, which is a concern as it is currently called the Eltham Regeneration Agency and the minutes of its meetings are not available since November 2011. It is also the case that the Council has redesigned this agency to give it a much broader brief. We doubt that it will be fit for purpose as it has seldom seemed to be anything more than a talking shop with little or no impact on the actual functioning of Eltham's town centre.</p> <p>General comment</p> <p>On a more general level we consider it may be worth mentioning that roads such as Court Road are nearing their full capacity, according to a TomTom survey Court Road is the 8th most congested road in Greater London. We do not believe that the roadnetworkcould take an 'intensification' of Eltham, unlike Woolwich or the Peninsula it simply does not have the capacity to expand the road network.</p>
29	Ms Sheila Field		<p>This is to say that I approve of the overall vision contained in the draft, even though the text is poorly written, with lapses of coherence. There aren't many officer reports as bad. In the main, though, I can look past the lapses. After visiting some of the sites and considering the proposals, there are three points I'd like to make.</p> <p>(1) Site 10: The Co-op Site</p> <p>The proposed change of use of the Co-op site from retail to entertainment, is exciting and has my support. For one thing, I go to the cinema occasionally to see new releases. I don't always want to wait for the DVD — six months is a long wait.</p> <p>Secondly I enjoy disco dancing and hope I can persuade you all to envision a disco nightclub in Eltham, on this or another site. If not this site, which one? If the decibel level were restricted, and sound insulation built in, the club would be fairly civilised and would even attract families. I learned from a past campaign to move the Rave Disco at Nathan Way, Thamesmead, that discos appeal to</p>

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			<p>parents as well as teenagers. Conceivably the nightclub might attract three generations of the same family. Certainly I as a grandmother would attend a disco nightclub in Eltham, if only there were one. My former neighbour in Kidbrooke, older than myself, also wants to attend a disco nightclub in Eltham. As for the sound level, a lot of church bands these days play loudly in the Sunday service....and I mean LOUD.</p> <p>At the moment I have to disco dance on my own at home, usually to a BeeGees CD. Perhaps you may not know that jive dancing exercises most of the muscle groups in the body and is as good as going to a gym. It removes arthritic body pain. Besides this, it is a form of self- expression mercifully not requiring words.</p> <p>Please think about this.</p> <p>(2) Site 10: The Sainsbury's Extension</p> <p>T also support the plans for bringing the Sainsbury's front door forwards. An extension of the store's floorspace is long overdue.</p> <p>(3) Site 3: The Palace Pedestrian Link</p> <p>On page 15 of the glossy brochure, there is a lapse of coherence which I cannot ignore, as it camouflages an inexplicable error of judgment on the part of the consultants. I attach the wording of page 15 with the relevant portion highlighted. I also attach a diagram of the relevant area, around the junction of Court Yard with Court Road. I hope the diagram shows clearly what the problem is. A visit to this area will soon make it clear what I am describing.</p> <p>The "large" area of planting referred to by the brochure, is not large — in truth it is barely large enough for the function it needs to fulfil. The last thing anyone needs is for this planting to be removed.</p> <p>The planting referred to is two adjoining flowerbeds in the pavement just north of the Court Yard junction. These beds are five-sided and bordered by a low brick surround. The planting consists of a small amount of mixed hedging, such as viburnum, laurel, senecio, which has been carefully trimmed by the Parks Dept to a neat squarish shape, and cut more or less horizontally on top, to a height of 5ft above pavement level. These small beds north of the junction are matched by a similar pair of hedging beds south of the</p>

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			<p>junction.</p> <p>The problem is as depicted in the attached diagram. The consultants deem that the northern hedging beds are a liability in that they allegedly obscure an attractive view southwards up Court Yard, and another attractive view northwards to the traffic lights.</p> <p>The truth is that these modest hedging beds are an asset, not a liability. This is because the views they allegedly block, are hardly attractive at all. In both directions, what the hedging does is to partially screen against the sight of an ugly queue of stationary vehicles, as well as the equally unwanted sight of vehicles moving in the road.</p> <p>As a visitor walks south towards Court Yard, with the hedging in front of him, the hedging partially hides a row of up to 16 parked vehicles and a motorbike, on the left kerb of Court Yard; this row of vehicles starts where the double yellow lines stop. This parking is in place Mondays to Fridays and has two main causes. Drivers visiting the big, two-group medical practice in Court Yard, can only park in its car park if they are disabled. Secondly, drivers visiting the Post Office or Sorting Office down the road, can't always park outside the Post Office, and know to park in Court Yard instead. Furthermore, vehicles on the move out of Court Yard, are obscured by the hedging as they wait to enter Court Road.</p> <p>In the other direction, as a visitor returns from the Palace northwards, the same brave hedging partially hides an ugly view of the long tailback of cars waiting at the traffic lights. It also mitigates the unwanted sight of vehicles moving southwards away from the lights.</p> <p>A visit to this area on a weekday will show all this very quickly - no need to wait to see the phenomena I have described. Since the brochure misrepresents what really happens at this site, and inverts the positive value of the hedging, I would be most obliged and grateful if you would get the error corrected in the text and remove the threat to the hedging before the text is adopted. Hedging is more environmentally friendly than cars, and softer on the eye. Many thanks.</p> <p>The Station-Palace Link generally</p> <p>Generally what needs to be done along the station-Palace pedestrian link, as everyone agrees, is to add a little signage here and there. I spoke to the postman who delivers along Court Yard. He keeps getting stopped - in Court Yard -- by visitors looking for the Palace. I spoke to a resident about where some signage could be put, and we concurred that a good spot was where I have</p>

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			<p>marked an X in the attached diagram - namely just near the end of the double yellow lines in Court Yard.</p> <p>A sign could be put there to read something along the lines of</p> <p>ELTHAM PALACE (plus an arrow) Straight on and to the right</p> <p>I hope these comments are helpful. Many thanks for the Eltham vision generally</p>
30	mr paul hadfield		<p>I would like to make the strongest possible objection to the proposals for major development on Orangery Square.</p> <p>Issue 1 : The new development on the Orangery Lane Car park is too close to existing residential properties at the top of Archery Road and along Dobel Road. The blocks of new residential are positioned right up against the rear fences of these existing properties. The drawings indicate that these new blocks of flats will be 3 or 4 stories high. This will significantly block out light and the new development will have an overbearing visual impact on these properties. The existing residential will be overlooked and views will be blocked even if the position of the blocks of residential is moved further away from the fence and the height of these new blocks is reduced to 2 stories high. The new properties will also overlook the existing residential properties. This will be extremely intrusive.</p> <p>The developments would result in a fundamental change of the setting on which the surrounding residential properties sit. It will have a detrimental impact on the value of these properties adjacent to the car park.</p> <p>The increase in the density of the population in the area will change the character of the place. It will add noise pollution and traffic pollution to an area which was designed for quiet residential usage.</p> <p>Issue 2: Access to Orangery Square</p> <p>The only point of access for vehicles to Orangery Square will be via Orangery Lane. Orangery Lane is already very congested with shoppers and deliveries to retail. Currently lorries start delivering to Lidl and M and S starting from 5am in the morning and keep residents awake at night at the top of Archery Road. If the development of Orangery Square goes ahead it would significantly increase the amount of traffic both from new residential and deliveries to additional commercial activity. It is not appropriate to have this level of congestion so close to residential properties, particularly those properties at the top of Archery Road which will suffer the most from increases in noise and pollution. Archery Road and Dobel Road are already extremely congested and these roads are used as a rat run to avoid Eltham High Street. An alternative access routes should be considered. One route could be to Well Hall road.</p>

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			<p>Issue 3 : Car parking</p> <p>The amount of car parking in Orangery Square is likely to increase due to additional residential and retail. What size will the multi story car park be? The footprint on the plans for the car park in Orangery Square is very small and probably unrealistic. A transport study should be undertaken to establish demand.</p> <p>General Comments</p> <p>Is it realistic to expect to get more retail on the ground floor units of new developments in Orangery Square.</p> <p>There has been little information provided to local residents on these proposals. Residents of properties adjacent to the developments were not sent letters informing them of the master plan.</p> <p>How are local residents and businesses represented on The Eltham Regeneration Board?. I am concerned that the Board may be dominated by the views of developers who are more concerned with the profits that can be realised through residential development than the needs of local residents and businesses.</p>
31	Mr Bill Ellson	Secretary Creekside Forum	<p>Dear Sirs,</p> <p>Thank you for the opportunity to comment on the Eltham Town Centre Masterplan.</p> <p>Such a document should be drafted in accordance with the Borough's Core Strategy, but in that the Core Strategy is yet to be finalised, we are not clear that it is. Furthermore it would be far better if the document was produced in an easy to use and print format preferably A4 portrait.</p>
32	Mr Ed Randall		<p>I have lived in Eltham for over twenty five years and know Eltham High Street and adjacent areas very well. I am acutely aware of the history of planning and development (should that be non-development) in Eltham, most particularly in relation to Grove Market and The Orangery. It is for that reason that I couldn't help but be struck by the disconnection between the sections of the SPD dealing with vision on the one hand and delivery on the other.</p>

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			<p>I share what appears to be a general concern about the way the authority has gone about the consultation. The SPDs, not just the plan for Eltham, appear to have been produced in haste and the consultation process - given the timescale for realising the different elements of the 'plan' [phased from 2012 through to 2027) - has been unnecessarily truncated.</p> <p>The SPD is essentially a wish list. Most elements of the wish list:</p> <ul style="list-style-type: none"> • Improved retail quality in the town centre • Improved evening economy in the town centre • Improvements to public spaces and pedestrian environment • Planting of street trees where possible • Improved parking arrangements • Increase density - where appropriate - on the High Street, if this is a means to achieving planning objectives that have clear public support • Increased provision of residential accommodation in the town centre/very close to it • Improved environment/ alleyways leading to and from the high Street • Commitment to promote, wherever possible, installation of attractive shop fronts and more mixed retail uses in the town centre <p>are all likely to attract a broad base of support.</p> <p>However, a plan isn't (shouldn't be) simply a wish list. It needs to link aspiration with realistic assessments about what can be achieved. It is noteworthy that key site owners and users, who have commented here, have make it clear that they have not been part of the process of developing the plan and many of them are clearly concerned about what happens next. It would be interesting to know why Allies and Morrison didn't make contact with: Richard Johnson and David Poole. The contrast between Bob McCurry of Berkeley Homes contribution and theirs is striking, unsurprising and, from a local point of view, not very encouraging.</p> <p>Given what is more a sketch than a plan it seems to me that the future of Eltham calls for an extended conversation in which the Eltham Regeneration Board/Agency plays an active and engaging part in a process that helps us to move on from the sketch to something that is more strongly rooted and connected with what can be delivered on the ground.</p>

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			I have read each of the SPD's that are currently open for consultation. I welcome many of the general ambitions they contain for the development of the Borough but note that those ambitions have yet to be matched by detailed plans and proposals.
33	Mr and Mrs C Scott		<p>Having attended the presentation in Eltham Library last Saturday, we are appalled that a document deemed to be 'so important' was given such little publicity. It smacks of trying to get something 'in on the quiet'.</p> <p>It is fine to have a 'vision' for the future. However, that 'vision' should have input from the residents of Eltham and not be designed as a 'desk exercise' by consultants. The consultants stated at the presentation that they had not spoken to any of the businesses or landowners mentioned as potential development areas or indeed existing ar park owners ie Sainsburys, Lidl's, Marks and Spencer. What is the point of presenting something without foundation?The Council has, no doubt, paid a lot of money to the consultants for this work.However, their vision is but 'one view' of what could be done. My wife and I, given the same remit, could come up with another vision of what could/should be done and, maybe be more realistic given our local knowledhge of Eltham of 60 years+. Why should their vision be better than one we could propose?? At least give residents a choice rather than a 'fait a complis'.One of our concerns with this piece of work by the consultants is that is seems to directly conflict with developments and schemes approved or implemented by the Council and it's officers. For example, the suggestion regarding 'opening up' of the area around the St Mary's Centre and removing the small arcade of shops could have been done when Sainsburys was built. That scheme was perfectly acceptable to all and we have buildings which all match and are not intrusive. Equally the suggestion of widening the pavements and not having buses stopping in the High Street conflicts with the current design implemented by the Council's Highway Department which reduced width of pavements in the High Street and designed the bus stop locations.Just because the consultants are saying it in their report doesn't mean they are right.!Just because Eltham is relatively low rise, this is not a reason to increase heights of buildings. Eltham's size is part of it's character and history. We do not in our view want that changed. The consultants have proposed a multi-storey car park behind Marks and Spencers and the artists impression shows 4 storey buildings on the land currently Orangery Lane Car Park and Lidl's car park. This is completely unacceptable . The existing car parks of Orangery Lane, Marks and Spencers and Lidl's all meet the needs of the shop owners in terms of their charging policy and Council in terms of revenue. Certainly the Council car park needs maintenance to make it more attractive but that is simply down to a lackof investment by the Council.There are proposals that could be implemented tomorrow - better signage from Eltham Station to Eltham Palace for example. How about refurbishing the toilet buildings outside the church so at least 'the vision' has one set of working public toilets in Eltham?There are variousother ideas in the proposals that are best described as 'kite flying'.We could comment upon and take issue with numerous points and statements within the draft proposal but this does not seem to be the appropriate stage to comment in such detail.We would urge the Council to simply 'note' this work and proposal as being just 'one vision' for Eltham and not the definitive solution. Further we would ask that the Council heeds the comments of residents and ensures that any developments in the Orangery Lane area that may be considered in the longer term are kept to a low level single storey nature.</p>

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34	Laurie Baker	Secretary Eltham Society	<p>I am writing on behalf of the Eltham Society with comments on the draft Supplementary Planning Document for Eltham Town Centre. Whilst the consultation period has not been long enough to have a considered discussion, we offer these comments in the hope that proposals will come forward that will be acceptable to people who live, work and shop in the area.</p> <p>First, we welcome the publication of the draft masterplan as a contribution to guiding development in Eltham over the next 15 years. I set out below comments on each section of the draft masterplan.</p> <p>Vision and objectives</p> <p>We agree with the high level Vision set out in section 2 and, generally, the Objectives in section 3. Whilst not disagreeing with increasing density In Objective 7, the Society would not wish to see building heights significantly increased.</p> <p>Obviously, achieving these objectives will require concerted action and investment over the 15 years. Even in these difficult financial times, the Royal Borough will have to commit resources to their achievement.</p> <p>Development principles</p> <p>Retail: improvements in the town centre should include a wider variety of non-food shops such as shoes, clothing and “white-goods”. Provision of shop units that will encourage smaller retailers of all types, food and non-food would help to diversify and enliven the retail provision.</p> <p>Residential provision is supported to help make the town centre sustainable and increase the night-time activity. Provision above shops should be encouraged and at certain locations at the back of the high street.</p> <p>Increasing leisure, cultural and community activities would be supported in certain circumstances, particularly facilities for local groups to perform.</p> <p>Evening economy: increasing the provision of restaurants would help but not by further take-aways and daytime cafes.</p> <p>Open spaces: we would support enlarging the pedestrian area of Passey Place and around St Mary’s Community Centre. The area around St John’s Church could also be opened out as a green open space; greater activity here would deter anti-social behaviour.</p> <p>Employment: we support the provision of small office and workshop units at locations around the town centre; buildings adjacent to the Arcade and at the Orangery site are particularly amenable to this use.</p> <p>Intensification: whilst supporting intensification in principle, this must not be at the expense of the current scale and character of the town centre. Buildings taller than the general heights of the area would not be supported because of the adverse effect on their surroundings and, because Eltham town centre is on a ridge, they would dominate the wider area.</p> <p>Gateways, links and alleys: we support the need for a sense of arrival at this historic centre to be embodied in the approaches to the town centre. The links to railway station and major historic attractions such as Eltham Palace and Well Hall (Tudor Barn) need to be made attractive and signage improved. We support the development of alleyways as important walking environments and to make them interesting places with more activity.</p> <p>Car parking: a parking strategy is very much supported that would involve a reduction in on-street parking and replacement by the development of more intense off-street parking (bearing in mind our reservations about high buildings). This would reduce the</p>

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			<p>dominance of the car but not eliminate the need for servicing and very short-term parking on-street. Parking needs to serve the town centre not dominate it.</p> <p>Streetscape and urban design: the Society has long advocated the removal of unnecessary street clutter and was pleased to have seen the recent removal of much of the guard-railing. However, there is much more to do to improve the street scene and this is one area that the council, with local groups, should be proactive to make the area attractive for people to invest in. There should be a softening and transformation of space to provide a benefit for shops and shoppers alike.</p> <p>Again, we would support guidance being prepared to help ensure high quality urban design. Development framework for specific areas</p> <p>The Society very much supports the statement that “all new development should be of an appropriate scale and massing for its context and of the highest possible design quality”. Whilst, generally, development companies invest in such sites, we would expect the council to be hard negotiators to get the most appropriate and sympathetic development for Eltham as, indeed, for the borough as a whole, and not be driven down to poor proposals by such developers.</p> <p>1. Mecca Bingo site</p> <p>If the site became available we consider that it could be updated as a concert, film, and conference centre. It is a fine example of work by Andrew Mather (1938), who also designed the Coronet (originally Odeon) at Well Hall. The circle is still complete and an experienced architect could sympathetically enhance and extend the art deco interior style which is so popular with visitors to nearby Eltham Palace. It might also be a useful building for the adjacent Eltham Hill School and could form an important place for local orchestras, concert bands and choirs to showcase their repertoire.</p> <p>2. Eltham Hill – should read Eltham High Street (to Sherard Road)</p> <p>Whilst sympathetic to the view of the church approaching from the west should be improved, there are few petrol stations in the Eltham area so losing one would lessen the competition; likewise car showrooms and repair facilities. While developers might be keen to replace the Eltham C of E School site at Archery Road we do not consider that this site is a good option as it would suffer from noise and pollution of high street traffic particularly when it tail backs from the traffic lights at Well Hall Road/Court Yard.</p> <p>3. Eltham Palace and station approach</p> <p>Any positive scheme would be a good contribution to improving the access and streetscape for visitors to the palace, and for local residents. Removal of unnecessary street furniture and the flower beds at Court Road/Yard would be supported. When originally installed they contained flowers – council financial cuts reduced the grown environment to shrubs that are now unsympathetically maintained by the council.</p> <p>4. Royal Mail sorting office</p> <p>The loss of this facility would shift job opportunities from Eltham and the spending power of the postal staff in the local economy. If Royal Mail did decide to vacate the building, some form of mixed development would be welcome including replaceable job creation. A height limit should be made, i.e. three storeys, based on nearby properties and not that proposed for Grove Market Place.</p>

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			<p>5. Argos block The Argos/Boots development took no prizes for architectural design and any improvement to access and/or design would be welcomed.</p> <p>6. Passey Place The area suffers visually from the poor design of the Argos/Boots development. There are no trees and landscaping to soften views – if there are opportunities to extend the pedestrian area such features could be included. Expansion of the pedestrian area would be supported to provide a focal point for a market and an outdoor performing area. It already has our town sign, which should be retained in an expanded area.</p> <p>7. Eltham High Street – public realm These proposals are supported. The judicious widening of pavements, provision of better bus boarding facilities that do not reduce traffic movement but deter anti-social parking and the retention of limited short-stay parking would improve the high street. We would not support chevron parking as that increases potential hazards through poor manoeuvring. Again, a lot of this should be done by the council to increase the attractiveness of the town centre. We, with other groups, have long advocated modest improvements to the traffic and pedestrian conditions in the area and it is now time to resurrect these ideas.</p> <p>8. Orangery Square Site A Many delicate negotiations would need to be entered into to effect change here as there are several land owners. Height of residential development and any multi storey car park should be limited to respect the setting of the Orangery.</p> <p>Site B A new access road from Well Hall Road to a car park should be considered to reduce pressure on Archery Road.</p> <p>Site C Single storey shops, of 1923, could be redeveloped with housing above, and set back, as part of a scheme to redevelop the BT site or even include some form of covered mall to a new car park.</p> <p>Site D We do not consider the proposed relocation of the school to the site near St John's church to be suitable as already indicated. However, unless a suitable site can be found to satisfy the Governors then there can be no movement of this school, which serves an important residential area.</p> <p>9. The Arcade The turnover of shops is quite high except for Avery's Homeware which has been here since the late 1950s. Perhaps if more buses stopped near the entrance it could attract extra customers to make the units more viable. It needs more people to pass through to increase viability. The original Arcade was to be double its size but the economic situation in 1931 precluded further development. Any improvements here would be welcome. Pavement improvements in Pound Place and Elm Terrace would be welcome at the</p>

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			<p>expense of parked cars in the former.</p> <p>10. St Mary's Place</p> <p>The Grade 2 listed St Mary's Community Centre is one of the few non-commercial buildings in the high street and benefited as part of the s106 agreement by Sainsbury's, the owners, when building their store to the rear. Proposed improvements, as indicated on the plans, would necessitate the removal of the St Mary's Place shops with the substitution of an entrance to Sainsbury's which would only work with the diversion of the historic Philipot Path nearer the high street. As mentioned at the Eltham Centre presentation this might give the opportunity to upgrade the area of the path as it joins Pound Place which is now a bit of a mess including some unplanned car parking.</p> <p>The former Co-op building (not of any architectural merit but a useful 3-floor building), now occupied by Poundland, could be used successfully for a larger store or a leisure facility and, if a cinema was viable, we would support it as there are good car parks and public transport in the area.</p> <p>Allied to St Mary's Place improvements, any extension of Sainsbury's towards the high street, reconfiguration of the car park and improvements to Pound Place should see the provision of an off-street taxi pick-up for shoppers. Additionally, the pavement on the high street side of St Mary's could be widened to enhance any new square that will give the building more prominence.</p> <p>Delivery of the Masterplan</p> <p>The Royal Borough has a crucially important role to facilitate improvement of the town centre. Obviously, the SPD is crucial to its role as local planning authority. However, the council must become more "joined up" between planning, the highway authority and regeneration all playing their part.</p> <p>Additional guidance should be developed to support this SPD Streetscape design manual to reflect the heritage of Eltham (comparable to the 1999 Greenwich Town Centre Streetscape Manual), Design principles to guide development Car parking strategy that supports the town centre, Development briefs for specific sites that are likely to come forward.</p> <p>Phase 1 to 2017 should include improvements to the streetscape and Passey Place as "pump-priming" that will add confidence in the town centre and help attract investment.</p> <p>We compliment Allies and Morrison for providing a thoughtful and thought-provoking draft masterplan for Eltham Town Centre. Lastly, there are some mistakes in the historical notes. We are willing to correct them, if required, for a donation to the local hospice.</p>
35	Mr Stewart Christie		<p>This period of consultation should be better publicised and run for a longer period of time.</p> <p>I hope that future detailed proposals are allowed far greater scrutiny.</p>

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36	Mrs Karen Crook		<p>Whilst I fully support any plans to improve the centre of Eltham and celebrate the history of the town, it seems counterproductive to move one of the institutions that has been in the centre of the town and served its residents for nearly 200 years. Eltham Church of England School (formerly Eltham National School but never 'Roper Street School' as referred to in your documents) has been on its current site since 1868. At present, the main entrance to the school opens on to Roper Street, a cul-de-sac off the High Street. If moved to the proposed site, access will be directly onto one of the major roads to Eltham with possible safety implications. (There is currently a crossing attendant on duty morning and evening at the junction of Orangery Road/Archery Road.) There is already congestion on Eltham Hill in the morning with parents dropping pupils off to Eltham Hill Technology College (very close to the proposed site) which is currently undergoing building work and will be increasing its population by opening a Post-16 provision soon. It is naïve to assume all parents/carers will walk their children to/from the new site or use public transport and the High Street will lose the extra business it currently has from families on the way to collect their children or on the way home.</p>
37		London Fire and Emergency Planning Authority	<p>We write in order to make comment n the above named document. Please note that we act on behalf of the London Fire And Emergency Planning Authority (LFEPA) and that this representation is made on their behalf. For your information, the following LFEPA sites fall within the borough:-</p> <ul style="list-style-type: none"> • East Greenwich Fire Station – 325 Woolwich Road, London SE7 7RF. • Eltham Fire Station – 266 Eltham High Street, London SE9 1BA. • Greenwich Fire Station – 4 Blisset Street, London SE10 8UP. • Lee Green Fire Station – 9 Eltham Road, London SE12 8ES. • Plumstead Fire Station – 1 Lakedale Road, Plumstead SE18 1PP. • Woolwich Fire Station – 24 Sunbury Street, Woolwich SE18 5LU. <p>We note that under section 4 'Development Principles' of the masterplan (page 10), sub-heading 'Public Realm & Urban Decay,' that plans to the Streetscape include 'wider pavements and some traffic calming measures to improve pedestrian comfort in the town centre'. Please note that Eltham fire station is located within this area fronting Eltham High Street. Any suggested traffic calming</p>

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			<p>measures or pedestrianised areas, need to take this into account as it is important that fire appliance response times are not impeded in any way. With the exception of the above comment, LFEPA support the masterplan and the objectives that it strives to deal with.</p> <p>We request that we be kept informed of progress with this plus further LDF documents. In addition, we wish to reserve our client's position to submit further representations on subsequent LDF consultations. Please do not hesitate to contact Mel Barlow-Graham should you require any further information or clarification.</p>
38	Mr Dick Allard	Westcombe Park Society	<p>The following are the comments of the Westcombe Society on the Master Plans for the Royal Borough of Greenwich. Our comments relate mainly to Charlton Riverside, Peninsula West and Woolwich but the more general points also apply to Eltham.</p> <p>Transport</p> <p>The Master Plans concentrate on creating an environment which is visually attractive and conducive to community development, and on the economic and social contribution of various elements to local development. These are clearly crucial issues. However, despite some welcome discussion of the need to promote sustainable forms of transport, there is no discussion of the impact that the proposals will have on the transport system and the harmful impact that high traffic levels have on pollution, noise and thus on quality of life. Currently there is a high level of congestion on both our roads and public transport so it is hard to see how the Master Plan proposals in their current form can have anything but a negative impact on an already congested transport infrastructure. The document gives inadequate consideration to transport infrastructure beyond making some suggestions about possible extensions to the DLR and river transport as well as the cable crossing. In terms of public transport, we regard it as essential (even as part of the Vision) to indicate any part of the proposed development which (to avoid unacceptable levels of crowding on existing facilities) would be dependent on the DLR extension, or on other upgrades.</p> <p>Greenwich Peninsula is a very narrow neck of land surrounded on three sides by water with limited access routes. Charlton Riverside is adjacent to the peninsular and also suffers from significant congestion. It is therefore hard to take many of the proposals seriously, especially the proposal to create a 40,000 seat outdoor sports and leisure facility. The plan admits that there is very little scope for further parking and yet public transport fails to cope adequately with events at the O2 and the roads become congested not only on the peninsula itself but also in the approaches. There is no consideration of the effects of the proposed development on the areas adjacent to the peninsula.</p> <p>To achieve high quality developments, any proposals within the Master Plan, residential, industrial or leisure should be subject to the over-riding constraint that it is consistent with an overall reduction of road traffic within the Borough, and that any increase in demand for public transport is made contingent on increased provision. In respect of road use, this means that any anticipated increase in traffic from new developments (for people or goods) has to be small enough to be fully compensated by reductions in demand from existing developments. Additional road capacity, such as the proposed Silvertown Tunnel, will not help, as they will</p>

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			simply induce corresponding additional traffic unless accompanied by other measures to restrain traffic.
39	Chris Smith	Greenwich Borough Liberal Democrats	<p>The wish to make Eltham a more attractive place to visit, increase its status as a hub and regenerate and reorganise its use of land is to be welcomed. We like the emphasis on providing more green space, more trees and improving the access to Eltham Palace.</p> <p>However we are less keen on proposals to redevelop the Mecca Building. This is an important leisure facility for residents and we would want to see much more consultation with residents over this and more evidence of other leisure facilities that would take its place.</p> <p>We are also concerned about the amount of time this is going to take. Parts of Eltham town centre have already had many years of redevelopment work and the prospect of this going on until 2027 seems excessive, despite the inevitable funding challenges.</p> <p>We as a group are very keen on pedestrian, cycling and public transport as an alternative to the car. However the car is still an important part of our developed economy and we need to be very careful as to how hard we squeeze the car driver. The comments that car parking is to be the "revenue generator" in this scheme raise fears that families, the elderly and disabled could be driven away from visiting Eltham should parking charges get out of control.</p>
40	Chris Lewcock	University of Greenwich	<p>This publication is a welcome stimulus to discussion about the developmental issues impacting on Eltham Town Centre. It is handsomely produced - and mercifully short! It identifies some of the key issues and opportunities which need to be addressed. It offers a number of potentially helpful suggestions about how to go forward. The Royal Borough should be congratulated on this initiative.</p> <p>A technical but very important concern is a doubt about the legal status of the document as SPD (Supplementary Planning Document). It is doubtful that it can - as claimed - be used as a material consideration in dealing with planning applications. In this very key respect the document could be worthless. This concern is explored in more detail in an Annex (below).</p> <p>A number of other weaknesses are addressed, in no particular priority order, below. Broad areas for possible improvement are: more systematic identification of problems and opportunities; use of a more robust evidence base; clearer identification of and commitment to implementation mechanisms.</p> <p>Local stakeholders should be engaged in much greater depth in the evolution of the plan. This would tap into their evident</p>

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			<p>knowledge about Eltham and enthusiasm to act upon this. It would also underpin successful implementation.</p> <p>This draft Masterplan is (only) a seed. It is to be hoped that the Royal Borough will provide it with the necessary nutrients of solid evidence and light of public involvement to allow it to develop and flourish.</p> <p>Issues</p> <p>These include; geographical reach; coverage of relevant topics, e.g. sustainability and parking and traffic; townscape proposals; development site selection; parking and transportation</p> <p>Geographical Reach</p> <p>The document is unclear about its necessary geographical reach. For example, stress is laid on the importance of the axis between the Palace and Eltham Station - neither is included on the plans! Similarly, the importance of developing interaction with the surrounding parkland is stressed but the parks are not shown.</p> <p>Coverage of Topics</p> <p>Surprisingly, in light of current concerns with climate change and the Royal Borough's own record in the area, no detailed consideration is given to environmental sustainability. There are passing references to the wildlife interest of St John's churchyard, the planting of trees along the High Street and developing linkages to the surrounding parkland. There is no systematic analysis of the possible focal role of the Town Centre. It might include amenity and waste reduction in developments, promotion of cycle and pedestrian routes, an urban landscape and wildlife assessment etc. etc. Thinking more imaginatively one might see Eltham developing expertise in sustainability retro-fitting to help promote itself as an eco-town.</p> <p>The report presents a very rosy view of the retail future of Eltham Town Centre. This view is supported by the town centre "health checks", the Experian report (published 2009 based on 2006 figures) prepared for the London Plan and the Grimley Eaves retail assessment for Bexley and Greenwich (published 2009 based on 2008 figures). The latter reports confirm Eltham's good record in keeping shops open. This is however a short term view based on relatively "old" data of a sector that is changing very rapidly in terms of regional distribution, technology and shopper preferences. A full assessment, and a plan dependent on it, should be more</p>

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			<p>cautious. The Experian report also drew attention to the long term impact of new developments such as at Elephant and Castle and Stratford East, suggesting a significant decline in Eltham by 2031. The Grimley Eaves report mentioned the rapid growth in internet shopping but didn't factor it into their assessments. They recommended that a further assessment of trends should be made in five years. In developing the Eltham Masterplan greater attention needs to be paid to the analysis of more recent reports, such as those for Dept. of BIS underpinning the Portas review, which lays much greater emphasis on the need to recognise and enhance the non-retail functions of traditional Town Centres. The draft Masterplan does list some of these wider functions, noting in particular the tourism and leisure potential of the town. However, this is not analysed in any depth and the plan is firmly rooted in an assumption of a continuing primacy of a core retail function at levels similar to today. Certain proposals seem to imply a very unlikely expansion of the retail function, e.g. to provide users for an upgraded Arcade and the alleyway frontages. The plan should seriously address the possibility of a significant decline of the retail function over the next decade and provide for sufficient robustness in the plan proposals to respond to this. This would be important for public investment choices and could be reflected in, say, a managed reduction of the length of the High Street retail frontage. Much more detailed analysis is needed of the range of actual or potential cultural and other activities which could contribute to its future viability. It's curious that, for example, the potential of the Theatre has been overlooked.</p> <p>More detailed analysis needs to be made of traffic circulation to, from and around the Town Centre. The report stresses the importance of enhancing Eltham's role as a transport hub. Reference is made to the expensive and improbable extension of the DLR to Eltham. There is, however, a series of more likely and immediate measures which would have plan implications and are not addressed. These might include: coordinating and focusing bus services on the Station so that people can actually interchange there; the development of systematic continuous pedestrian and cycle linkages throughout the Town Centre and into the surrounding Parks.</p> <p>A second traffic issue relates to (a) proposals to enhance the High Street by narrowing it, reducing its carriageway width and limiting car parking and (b) to redevelopment of the existing main car parking areas. Little analysis seems to have been made of the parking requirements across the Town Centre and it is unclear what or where any displacement parking would go. As noted, no consideration has been given to environmental sustainability policies which might incorporate active proposals for reducing car use. Passing reference is made to the use of echelon parking on the High Street - which seems to undermine the objective of improving the appearance of the High Street! - and a hypothetical multi-storey car park. The most likely outcome would be displaced parking on roads such as Dobell and North Park. These would also need to take an increase in traffic avoiding the narrowed High Street. How are local residents likely to react?</p>

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			<p>Another significant issue which has been overlooked is the question of social exclusion. As the draft Core Strategy notes there are still “pockets of deprivation” in Eltham. Thought needs to be given to ensuring that activity in the Town Centre engages all sections of the community so that they buy into its future. Possibly related to this some references are made to the need to or possibility of putting additional housing in the Town Centre. This could be a good thing in that it could mop up (potentially) redundant retail premises and land, increase self-policing and vitality, and provide for local housing needs. It might of course run counter to the passing comment that it is hoped to increase evening activity in the Town Centre. Householders may not appreciate all that goes with the “café society” nowadays? No evidence is provided by which to judge the need for and numbers and type of housing to be provided.</p> <p>Townscape</p> <p>Some insightful remarks are made about under-exploited townscape potential, for example, the historical alleyway network behind the High Street. Helpful comments are made about weaknesses in Eltham’s townscape. Reference is made to some examples of the numbers of relatively low rise buildings which create a series of incongruous gaps in the High Street frontage.</p> <p>However, the townscape assessment has not been carried out (or at least has not been presented) on a systematic basis. There are evident gaps. For example, the potential importance of the Catholic Church complex and surrounding area at the top of the High Street is not mentioned. Although the Station complex is identified as a key entry point to the Town no mention is made of the fact that it comprises some of the ugliest buildings in Eltham squatting between the rest of the town and a main attraction (the Pleasaunce) and should be a priority redevelopment location. Similarly, the Palace is rightly seen as the Town’s major asset. However, no reference is made to the limited public access to the former parkland to the east (the golf course) and the sorry state of the parkland slopes immediately to the west (which has magnificent views across London) both of which would be important complementary assets.</p> <p>A more detailed analysis is also required in the vicinity of particularly sensitive buildings or groups of buildings. For example the group of buildings immediately rear of Costa Coffee could either form a pleasant courtyard leading off an enhanced alleyway network - or be overwhelmed by the proposed new redevelopment next door.</p> <p>Proposals for the physical improvement of the High Street are to be welcomed in principle. (As noted above, there are knock-on effects that have not yet been addressed). Before any detailed proposals for landscaping and tree planting are carried out there is a need for a much fuller detailed appreciation of the High Street townscape. It has an unusual upwardly twisting character which could</p>

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			<p>be significantly enhanced by careful planting etc. Poorly located lines of “lollipop” trees running up both sides of the High Street might obstruct important sightlines and simply obscure rather than frame and enhance the many interesting and attractive buildings. The draft Masterplan suggest that a further guidance document on detailed design work is needed for example for replacement shop fronts. This is slightly puzzling since one point of a Supplementary Planning Document is surely to provide the detailed guidance on design principles - which the present draft Masterplan skates over.</p> <p>The Development Sites</p> <p>It is not at all clear how certain potential development sites have been identified over others. There are many premises in the Town Centre which have relatively low density and/or are coming to the end of their useful life. The under-developed site of the BT offices and the frontage to the High Street is rightly identified whereas, for example, the low-rise development back from the corner of Footscray Road and the High Street is not. Sainsbury’s is considered for redevelopment whereas it seems that Poundland is not. This latter presumably means that the proposed square around St Mary’s Community Centre would have a continuing unsightly service gulch alongside it? A much fuller analysis is required</p> <p>Redevelopment of “tired” premises around the Catholic Church and Fire Station and opening up of the reservoir site could transform the top end of the High Street. As noted above, the Station area (including air space over the A2) should be a prime candidate for redevelopment. Undoubtedly some possible projects have been parked in the “too difficult” zone. That may be so in the immediate future but should it be so for the whole life of an ambitious new plan for Eltham? And should such options be removed from a plan by even before they see the light of public comment?</p> <p>The loss of existing activities on some proposed development sites would be likely to severely damage the viability and vitality of the Town Centre. These include the replacement of the Bingo Hall with housing and the relocation of the Roper Street School to the edge of the town centre. Neither is necessary. Indeed these ideas appear to run counter to the whole thrust of the plan – to increase the vitality of the Town Centre – by eliminating two key premises which manifestly do generate footfall and vitality.</p> <p>It is regrettable that strategic alternative patterns have not been put forward for the redevelopment of sites around the Town Centre. Different levels of parking provision could be shown and the relative merits assessed. Different options for the creation of public spaces and pedestrian and other links around the Town Centre could be put forward. For example a public square might be suggested facing the handsome rear façade of Marks and Spencer – creating a clear focus for redevelopment of that area.</p>

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			<p>Implementation</p> <p>The Plan needs to be underpinned by an assessment of all the possible instruments for implementation. In order to progress many of the proposals in the plan the Royal Borough will need to take a very active approach. As an example, putting together developable sites at the rear of the High Street is very likely to require the deployment of compulsory purchase powers. If the Council is unwilling (especially in straitened economic times) to deploy such powers then it needs to say so now. A much more limited range of development options would then present itself.</p> <p>It is apparent that there is at present existing very weak or non-existent enforcement of the quality of advertisements and shop fronts. This has resulted in avoidable very significant incremental deterioration of the quality of the street scene. Clear and detailed design guidance should be prepared and published at the same time as and to complement the final version of the SPD. Otherwise development control officer faced with future applications will have no defence to the question - but you allowed these other awful buildings, what's wrong with mine?</p> <p>It is very disappointing that local residents and institutions have not been more involved in the preparation of the plan. This is a major lost opportunity to engage those who are most interested in and knowledgeable about the problems and potential of the Town.</p> <p>Annex: Strategic Status</p> <p>The London Plan approved in July 2011 sets out a broad strategic context. The role of Eltham Town Centre is identified in Chapter 2 and Annex 2 of the Plan as a major centre with medium potential for growth “<i>with moderate levels of demand for retail, leisure or office floorspace and public transport capacity to accommodate it</i>”. Broad brush policies are set out e.g. development should “<i>sustain and enhance the vitality and viability of the centre</i>”. The London Plan (Policy 2.15 D) requires Boroughs to “<i>...identify town centre boundaries ... in LDF [Local Development Framework – see below] proposals maps and set out policies for each type of area ...</i>”</p> <p>Greenwich doesn't at present have a Local Development Framework (LDF) and is running on “saved” policies from the 2006 Unitary Development Plan (UDP). These include Policies specifically relating to Eltham Town Centre and reflect the sort of broad brush wording in the London Plan.</p> <p>Greenwich's Local Development Framework is in hand and will be made up of a portfolio of Development Plan Documents (DPD).</p>

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			<p>The Council has already carried out a consultation exercise on a proposed Core Strategy for the Borough and it is hoped to publish a final version in the course of 2012. The draft Core Strategy shows ... Alongside the Core Strategy will be a Site Allocations document which is yet to be published. As the latter name suggests this would show where significant new development should preferably be sited in order to give greater certainty to developers and others. The Local Development Scheme (LDS, a sort of project progress document for the LDF) advises that <i>"The Site Specific Allocations DPD will identify land and individual sites across the Borough which have been allocated for a specific use."</i> This can be expected to include any proposed major development or redevelopment sites in and around Eltham Town Centre. Another document will set out the Council's policies for dealing on a day to day basis with development proposals.</p> <p>At a detailed level the last Eltham Town Centre Development Plan was produced in 1997. The UDP indicated (in 2008!) that it was "under review". It is possible for Greenwich to prepare a fourth type of DPD which would set out more detailed plans for particular issues or areas. The regulations make provision, for example, for the creation of ... and Area Action Plans. An Area Action Plan might be an appropriate vehicle to take the many and varied issues in and around the Town Centre forward. It is perhaps this type of plan that the authors of the London Plan (see above) had in mind. However, there are currently no proposals for any DPDs for Eltham. One difficulty is that all DPDS have to be the subject of rigorous and repeated public scrutiny and may be subject to independent inspection. This would undoubtedly be costly and time-consuming.</p> <p>The Council is also allowed to publish Supplementary Planning Documents (SPD). These require much less consultation and scrutiny. This is what the new draft Eltham Master Plan is described as being. However, the Council itself makes clear in their Local Development Scheme that SPD <i>"Will provide further detail on the implementation of particular policies and proposals contained in a Development Plan Document. SPDs must relate to policies or proposals in a DPD and they may not [the Council's underlining] be used to set out new policies nor to allocate or re-designate land for specific purposes."</i> The draft Eltham Master Plan clearly does set out new policies, and proposals for site redevelopment or reallocation, e.g. the Bingo Hall for housing, the redevelopment of the School. The relevant government guidelines state <i>"Core Strategies can allocate strategic sites ... If it is necessary to allocate sites which have not already been allocated in the core strategy, a DPD must be used to allocate these sites."</i> And, more bluntly, SPD should <i>"...not be prepared with the aim of avoiding the need for the examination of policy which should be examined"</i>.</p> <p>The above might seem a rather abstruse technical argument but it does have important implications. The Council claims that if approved the Masterplan would be a "material consideration" for development control purposes. In other words, if a developer came forward with proposals for a site which is shown for redevelopment then he would be able to claim that the Council had already conceded the principle of development of the site in the Plan. All other discussion would be around the details. But the</p>

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			<p>principles contained in the Eltham SPD would not have been subject to the level of public scrutiny and debate expected by the regulations.</p> <p>Whilst the Council is undoubtedly trying to speed up a rather cumbersome, costly and time-consuming process the unfortunate impression is given of a wish to avoid detailed public debate. Quite apart from the discussion above the SPD has emerged somewhat out of the blue. It wasn't even shown in the pipeline in the latest Annual Monitoring Report. It appears as a surprisingly rushed, top down and exclusionary approach in the era of localism and neighbourhood planning. Nevertheless it could be used as the starting point in an exercise tapping into the knowledge and enthusiasm of local people and their representative societies. This might lead forward into a properly formulated Action Area Plan.</p>
41	L Holt	Marks & Spencers Plc	<p>I am instructed by Marks and Spencer to comment on the Eltham Town Centre Draft Masterplan. It potentially has significant implications for parking, the shopping environment and the operation of the Marks and Spencer store, particularly as it includes a proposal to redevelop the existing Marks and Spencer car park.</p> <p>The objectives of the Masterplan to enhance the town centre as a retail location are supported. Improving the public realm is also welcomed.</p> <p>However, the suggestions in relation to the Marks and Spencer site are of concern. They have not been discussed and agreed with the company and, if they were to be implemented, they would have major implications for customer parking and the operation of the store.</p> <p>Marks and Spencer is a key anchor retailer for Eltham. The company's continuing success will help to ensure that the centre remains attractive to shoppers. It is important, therefore, that proposals do not have a detrimental impact on the store. Indeed, to do so would be contrary to the stated objective of the Masterplan of improving retail provision. The store car park to the rear is an important customer facility supporting the store and providing parking for shoppers visiting Marks and Spencer and other stores in the town.</p> <p>The proposal shown diagrammatically in the Masterplan would result in the loss of much of the existing Marks and Spencer surface car park. A decked car park appears to be suggested in its place. However, this is not an aspiration of the company, it is unclear how many spaces would be provided but it may well result in a loss of capacity, there are no indications of how it would be funded, whether this would be viable and what operational arrangements would be in place. It is not at all clear that suitable parking could be</p>

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			<p>provided within the land along with the new building (offices or residential) that the Masterplan shows on the road frontage.</p> <p>Office or residential development would have its own parking needs and residential may not be a suitable use in close proximity to a decked car park and shop servicing.</p> <p>The Masterplan suggests this would take place as part of Phase I (2012-17) but the basis for such a timescale is not explained.</p> <p>Elements of the Masterplan are very 'broad brush' and highly aspirational. It lacks detail and it is not clear that it has a sound, implementable basis. Key issues such as landownership do not appear to have been considered. It suggests very large scale redevelopment not reflecting development and take-up rates seen the area and it is not clear how this could be achieved at a time of slow recovery from economic recession. Plans and proposals should be realistic and achievable if they are to command support.</p> <p>The proposals the draft Masterplan contains for my client site have not been discussed and agreed with Marks and Spencer. Overall, those proposals could significantly harm the operation of the store.</p> <p>Reference is also made in the Masterplan to potential parking changes on the High Street and elsewhere. More would need to be known about the implications of that suggestion to form a view on whether this would be beneficial to the operation of the shopping area. Similarly the proposal for a development brief for car park areas is not explained and would need to be clarified in terms of objectives and implications in order for it to be established whether this would be a positive proposal.</p>
42	Mayor of London	Mayor of London Greater London Authority	<p>Thank you for your letter consulting the Mayor of London on the draft stage of Charlton Riverside; Peninsula West; Woolwich and Eltham Supplementary Planning Documents (SPD). The Mayor has afforded me delegated authority to make comments on his behalf on emerging SPIDs. The GLA welcomes the opportunity to consider the documents at this draft stage. These comments are officer —level only and do not preclude any further comment the Mayor may make on future consultation phases of the Council's Local Development Framework.</p> <p>The following comments relate to all of the documents:</p> <p>Overall transport</p> <p>The masterplans are very high level and 'visionary'. Although TfL has no objection to boroughs producing such documents, they must</p>

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			<p>have been developed with an appropriate consideration of current and potential transport provision, in line with London Plan policies 6.1 (strategic approach) and 6.3 (assessing the effects of development on transport capacity). These four masterplans appear not to have been assessed for current and future transport accessibility and capacity, as required by the London Plan, and assume transport schemes that are not being actively planned and do not appear in the London Plan, Mayor's Transport Strategy (MTS) or east London Sub Regional Transport Plan(SRTP). Adopting the masterplans as supplementary planning documents (SPD) is therefore considered to be premature.</p> <p>As SPD, the masterplans will carry more planning weight than is considered appropriate for the level of assessment undertaken to develop them. Publishing before consideration of strategic transport impacts, capacity and requirements via for example the preparation or updating of Opportunity Area Planning Frameworks (OAPFs), also seems inappropriate. In the case of Eltham town centre, there is no OAPF, so the masterplan itself should be subject to further strategic transport assessment. If the masterplans are to be adopted as SPD, they should be heavily caveated along the lines of:</p> <p>'This masterplan is subject to assessment of its strategic impact on transport and other infrastructure, achieved as appropriate through the OAPF/masterplan process. In addition, individual planning applications should, as per local and London Plan policy, be accompanied by a transport assessment'.</p> <p>The masterplans also raise the following specific concerns that could conflict with London Plan and MTS policies and could have implications for transport operations. These concerns are outlined in more detail below, along with highlighting factual errors. TfL is making a separate response to RBG in respect of its development and commercial land holdings.</p> <p>Overall Strategic Industrial Land release</p> <p>The Mayor's Draft Land For Industry and Transport 2012, which is currently out for consultation, sets out that there is no capacity for employment land release in Greenwich for the period 2011 - 2031. However Greenwich is still in the limited transfer category and as such there is some flexibility for release if this is backed up by robust local evidence.</p>

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			<p>On a sub-regional basis within the South East London sub-region the actual quantum of industrial land release (54 ha) has been higher than the recommended 2010 Benchmark figure of 33 ha. The majority of this release has been in Greenwich and Southwark. While these rates of release are slightly higher than the comparative benchmark period figures, they are within the overall Benchmarks release timeframe release figures of 2006 to 2026 (which equates to 146 ha release in South East London).</p> <p>Overall energy</p> <p>Consideration should be given to the development of a district heating network. Comments on each of the documents are set out below:</p> <p>Eitham</p> <p>This SPD raises no strategic issues other than that the SPD specifically mentions an extension to the DLR to Eltham Station. This scheme is not identified in the London Plan, SRTP or MTS, or been subject to assessment. As such it is very premature and reference should be removed, or replaced with a more general reference to 'potential improvements to public transport'.</p> <p>As you are aware all local development documents including Supplementary Planning Documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Further discussion is needed on Charlton Riverside and Greenwich Peninsula West SPD's, as well as provision of the relevant corresponding draft submission core strategy policies, before it can be said that these SPD's are in general conformity with the London Plan.</p> <p>This process of aligning strategic and local plan policy would be greatly aided by closer joint working as suggested in representations to previous policy documents. GLA officers were not party to working up the final draft of the SPD's, and whilst Greenwich is entitled to manage this process as it sees fit closer engagement early on in the plan making process is more likely to result in mutually beneficial outcomes. We are keen to explore options around SIL and wharfs with Greenwich but it is difficult to do this if the current approach continues.</p>
43	Metropolitan Police Authority	Metropolitan Police Authority	<p>I write on behalf of our client the Mayor's Office for Policing and Crime / Service (MPA/S) with regard to the above draft documents. They have been reviewed by CgMs on behalf of the MOPC/MPS, mindful of relevant national and local planning policy, and we therefore make the following observations and recommendations.</p>

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			<p>The MOPC/MPS provide a vital community service to the Royal Borough of Greenwich and policing is recognised within the 2011 London Plan as being an integral part of social infrastructure. It is essential that the MOPC/MPS are well represented within the emerging LDF documents and these masterplans in order to ensure that the impact of new development upon policing can be mitigated.</p> <p>Context to Represent ti'ons</p> <p>The provision of effective policing is of crucial importance across London to ensure safe places to live are created as part of a sustainable community consistent with planning policy. I therefore refer briefly to relevant policies regarding the consultation masterplan documents below:</p> <p><i>National Policy</i></p> <p>The MPA are mindful that PPS1 states that Councils should prepare development plans which promote inclusive, healthy, safe and crime free communities Also Circular 05/05, paragraph B9, advises that developers may be expected to pay for or contribute to the cost of all, or that part of additional infrastructure provision, which would not have been necessary but for their development.</p> <hr/> <p>One of the objectives of the Draft National Planning Policy Framework (NPPF) July 2011 is to deliver the right community facilities, schools, hospitals and services to meet local needs (para 124).</p> <p><i>London Plan Policies</i></p> <p>At strategic level, paragraph 1.40 of the London Plan (July 2011) states 'a growing and increasingly diverse population will create demand for more social infrastructure' which, by definition, includes policing and other criminal justice or community safety facilities.</p> <p>This is reflected in Policy 3.16 Protection and Enhancement of Social Infrastructure which states that 'London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population'. Paragraph 3.89 further notes that existing or new developments should, wherever possible, extend the use of facilities to serve the wider community, especially within regeneration and other major development schemes.</p>

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			<p><i>Local Policy</i></p> <p>In addition, policies SCI and CI of Greenwich's Unitary Development Plan provide overall support for community services and facilities and Annex G of the Planning Obligations SPD (Adopted September 08) strongly support the provision of policing facilities in the borough.</p> <p>Given the support for policing within the national and regional planning policy context, it is therefore appropriate to ensure that the needs of the MOPC/MPS are reflected within the masterplan documents.</p> <p>General Representations</p> <p>In line with the overarching policy, it is key for the emerging masterplans to be supportive of policing and the provision of policing.</p> <p>Key to this is the provision of new policing facilities in line with development growth in the four masterplan areas. The MOPC/MPS are mindful that significant additional development is likely to come forward within the four masterplan areas through the introduction of new uses and the intensification of existing uses. The scale of development will increase demands on police resources and the MOPC/MPS request that this impact upon policing be regarded as a material consideration during application determination process and that this is reflected within the emerging masterplans. This would ensure the masterplans are in accordance with London Plan Policies, in particular 3.16, and policies SCI and CI of Greenwich's UDP. Additional wording in each masterplan supporting the provision of contributions towards policing would address the issue.</p> <p>Safety and security through good design is key in ensuring crime reduction. Secured by Design is an important initiative promoted by the Metropolitan Police to ensure a safe and secure environment is created within development proposals. Section 16 of PPS1 states that plan policies should deliver safe, healthy and attractive places to live. The inclusion of Secured by Design (and other similar measures) in the emerging masterplans is required.</p> <p>It light of both points above, it is requested that the MOPC/MPA are consulted in relation to all major applications in the masterplan areas.</p> <p>Eltham Police Station is located within the masterplan area. This forms a key part of the policing estate in this part of the borough.</p>

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			The document indicates that it is an 'existing town centre building'. The MOPC/MPS foresee the retention of this building as a police station and would seek to protect it.
44	Janet Goulton	Planning and Development Manager London City Airport Limited	<p>We would like to thank you for your email inviting London City Airport to comment on the Masterplans in place for Charlton Riverside, Woolwich Town Centre, Greenwich Peninsula West and Eltham Town Centre.</p> <p>Aerodrome safeguarding ensures the safety of aircraft and their occupants when in the vicinity of an aerodrome by controlling potentially contentious development and activity around it. London City Airport has a very specialised set of safeguarding surfaces which surround the airport, approved by the CAA, to ensure that building heights do not interfere with safe aircraft operations.</p> <p>Our support for development and regeneration in London is complimented by our approach to aerodrome safeguarding and consequently we would like to draw your attention to the Civil Aviation Authority's (CAA) documentation entitled <i>CAP 738 Safeguarding Aerodromes</i> and specifically <i>Appendix C London Tall Buildings Policy</i>. This document specifies the CAA's policy with regard to future buildings or other constriction developments and the need to maintain the safe and efficient use of airspace over London.</p> <p>Whilst London City Airport in principle supports the proposals put forward and is keen to assist with the sustainable development of the area, it must be stressed that early consultation on the above issue in conjunction with the CAA's London Tall Buildings Policy is vital, and we actively encourage developers to bear this in mind throughout the planning stages.</p>
45	Carmelle Bell	Planning Administrator Thames Water Plc	<p>As you will be aware from previous representations, Thames Water are the statutory water and sewerage undertaker for the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2004 (as amended in May 2008). The provision of water and waste water infrastructure is essential to any development.</p> <p>We have the following comments on the consultation document:</p> <p>Waste Water/Sewerage and Water Infrastructure</p> <p>A key sustainability objective for the preparation of the new Local Development Framework should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 5.1 of PPS12 relates to other Development Plan Documents (DPDs) and states:</p>

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			<p><i>“ LPAs should consider the following criteria when determining which DPDs other than the core strategy they produce:.....In considering these questions, the following issues should be considered:</i></p> <p><i>- the requirements of utilities/infrastructure providers... ...”</i></p> <p>Policy 5.14 of The London Plan, July 2011 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and states:</p> <p><i>“Strategic</i></p> <p><i>A - The Mayor will work in partnership with the boroughs, appropriate agencies within London and adjoining local authorities to:</i></p> <p><i>a) ensure that London has adequate and appropriate wastewater infrastructure to meet the requirements placed upon it by population growth and climate change</i></p> <p><i>b) protect and improve water quality having regard to the Thames River Basin Management Plan</i></p> <p><i>Planning Decisions</i></p> <p><i>B - Development proposals must ensure that adequate wastewater infrastructure capacity is available in tandem with development. Proposals that would benefit water quality, the delivery of the policies in this Plan and the Thames River Basin Management Plan should be supported while those with adverse impacts should be refused.</i></p> <p><i>C - Development proposals to upgrade London’s sewage (including sludge) treatment capacity should be supported provided they utilize best available techniques and energy capture.</i></p> <p><i>LDF preparation</i></p> <p><i>E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames</i></p>

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			<p>Tunnel.”</p> <p>Policy 5.15 of the London Plan relates to water use and supplies.</p> <p>It is unclear at this stage what the net increase in demand on our infrastructure will be as a result of the proposed development. However, the masterplans need to consider the net increase in waste water and water demand to serve the development and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.</p> <p>The list of issues covered in the masterplans should therefore make reference to the provision of sewerage and water infrastructure to service development. This is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.</p> <p>To accord with PPS12 and the London Plan text along the lines of the following section should be added to the framework:</p> <p>“Water Supply & Sewerage Infrastructure</p> <p><i>It is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.</i></p> <p><i>Further information for Developers on water/sewerage infrastructure can be found on Thames Water’s website at:</i> http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm</p> <p><i>Or contact can be made with Thames Water Developer Services</i></p>

ID	Full Name	Organisation	Comments
			<p>By post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY;</p> <p>By telephone on: 0 845 850 2777;</p> <p>Or by email: developer.services@thameswater.co.uk ”</p> <p>Thames Water would also welcome the opportunity to work closer with the Local Authority to better understand the proposals as they evolve with time.</p> <p>Other Comments</p> <p>We would also like to draw your attention to the following issues with regards to the draft AAP:</p> <p>Tree Strategy and Planting –</p> <p>Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system and water supply infrastructure. In order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.</p> <p>Access –</p> <p>Thames Water will require 24 hour vehicular access to any pedestrianised area to undertake emergency works. Access to the sewerage and water supply infrastructure must not be impeded by street furniture. This will enable Thames Water to operate the network with as little interruption to the service as is possible.</p> <p>8 Catering Establishments –</p> <p>Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle</p>

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			for the production of bio diesel. Failure to implement these recommendations may result in properties suffering blocked drains, sewage flooding and pollution to local watercourses.
46	Ms Anna Townend	Greenwich Environment Forum	<p>SUMMARISED FROM HANDWRITTEN COMMENTS</p> <p>1. Town centre is currently in transition due to demographic change, and gradual economic change. Street structure is more intact. Strong and independent civic involvement. Adapts to changing times. Masterplan timeline demonstrates this</p> <p>2. Much can be done in small incremental improvements as this masterplan successfully demonstrates. Hard edge of new developments has not best shown sensitivity. Historical links are important. Would like to see fields and semi-rural landscape around the palace brought out and strengthened as local green belt</p> <p>3. This masterplan shows the most promise of the four plans to be able to fulfill sustainability criteria</p> <p>All 3 of the riverside masterplans, - Charlton Riverside, Greenwich Peninsula and Woolwich - lack a sustainable development approach even though this is a critical part of the planning system (Planning Policy Statement 1). We seek changes to the vision and objectives of all 3 masterplans so that environmental, economic and social sustainability are brought to the centre of the documents.</p> <p>Environmental sustainability</p> <p>The vision and objectives should engage wholeheartedly with waterside issues, and draw attention to the value and importance of protected wharves and facilities.</p>

ID	Full Name	Organisation	Comments
			<p>The objectives should include:</p> <ul style="list-style-type: none"> - To maximise the potential for freight transport by river, the aim is to safeguard all wharves providing access points for freight along the riverfront. - A presumption against tall buildings along the riverside, given their seriously negative effect. <p>The riverside is a very green area, so it is surprising that the vision and objectives do not give a high priority to the protection and enhancement of green space, including natural habitat.</p> <p>The proposed developments will increase traffic, and measures need to be taken to protect air quality. These should be stated as objectives, including Low Emission Zones.</p> <p>We would like to understand the impact of development on carbon emissions and there should be a commitment to carbon accounting.</p> <p>Economic sustainability</p> <p>Some of the objectives - for example for Charlton Riverside - have a lot to say about</p>

ID	Full Name	Organisation	Comments
			<p>employment, but the vision in each document is to relocate (at best) existing businesses and industries, to delete some of the strategic industrial locations and to use employment land for residential development. Even the proposed Charlton Garden City is characterised by its residential function, ignoring the important economic base that informs the Garden City model.</p> <p>In the London Plan, these areas are set a target for employment growth, ranging from 1,000 new jobs at Charlton Riverside to 7,000 new jobs at Greenwich Peninsula.</p> <p>Therefore, the vision for all 3 must include the aspiration to achieve employment growth, clearly stated as a net increase in jobs. To be sustainable the vision should also be towards a low carbon economy.</p> <p>Several objectives will assist in the delivery of more jobs and a low carbon economy.</p> <p>There must be reference to higher education growth, high tech industries, investment in engineering and architecture. But this is the high end and there is also the need - and this is the part that is missing - to really address low wages and poor conditions in retail,</p>

ID	Full Name	Organisation	Comments
			<p>catering, cleaning, personal care, repair and maintenance. There must be reference to the London Living Wage, to training opportunities, and to economic diversification .</p> <p>The objectives should be proposing a variety of green jobs, and there should be recognition of the voluntary sector contribution to the economy, including social enterprises. A vision of local sourcing, local procurement of services, support for local shops, businesses and street/covered markets would also help promote more sustainable local economic activity.</p> <p>Social sustainability</p> <p>The vision should be for a lifetime neighbourhood and a walkable community, where all amenities and services are within walking distance. This includes local shops, play areas and community meeting spaces as well as local education and health provision. These are all very important social infrastructure which must be explicitly mentioned.</p> <p>The objectives should also make clear that affordable family housing is the highest priority</p>

ID	Full Name	Organisation	Comments
			<p>We note the deficiencies in the consultation on these masterplans and we expect there will be a far more collaborative approach to the production of the Core Strategy submission document. We look forward to discussing with you how sustainable development can be at the heart of the Core Strategy.</p>
47	Beverley Flaxman		<p>As a local resident and parent of children attending Eltham Church of England Primary School, I wish to place on record my strong objection to any proposal to relocate Eltham Church of England Primary School from its current site.</p> <p>The school, known as Eltham Church of England Primary School, previously, Eltham National School, and not Roper Street as referred to in your consultation document, has been on this site since 1868, is a local treasure, and can be credited with educating generations of Eltham children, and to move it would, I feel, be an utter travesty. The school is an invaluable facet of Eltham's history and future.</p> <p>Currently, the main entrance to the school is located in Roper Street, a quiet</p>

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			cul-de-sac, ensuring the children safe access to school. The alternative access, policed by a Crossing Patrol at the Orangery Lane / Archery Road intersection also enables safe access to the children. To relocate the school to an already chaotic junction on Eltham Hill, with the increased roll at Eltham Hill Technology College, and added congestion this will bring, would , I feel, endanger primary school aged children's safe access to school.
48	Miss PM Perrin	U.K.I.P	<p>SUMMARISED FROM HANDWRITTEN RESPONSE</p> <ol style="list-style-type: none"> 1. 4 lane highway forms part of the essential character of Eltham. Side walks should only be widened if 4 lanes can be retained. 2. People are unlikely to want to sit outside in the traffic fumes. 3. By all means encourage a department store onto the High Street 4. Small independent retailers should be encouraged. Should be assisted by 50% reduction in business rates 5. No benefit having supermarkets on High Street. People do their food shopping separately from other shopping 6. If supermarkets are accessed through arcades, allows small businesses to set up cheaper premises behind the main street but still be found 7. The squares and closes could be provide ideal retreats for cafes 8. Royal Mail should be encouraged to stay in accessible central sites. Needs to be convenient

ID	Full Name	Organisation	Comments
49	Ms Claire Craig	Planning Policy English Heritage - London Region	<p>1.1 As the Government's statutory adviser on the historic environment English Heritage is keen to ensure that the historic environment is fully taken into account at all stages and levels of the local planning process. English Heritage therefore welcomes the opportunity to comment on the four Supplementary Planning Documents (SPDs) currently out to consultation for the Royal Borough of Greenwich.</p> <p>1.2 The Royal Borough of Greenwich contains a rich and varied historic environment, including a range of historic structures, townscapes and landscapes, as well as evidential heritage value in historic and prehistoric archaeology both from the Thames foreshore and inland.</p> <p>1.3 Planning Policy Statement (PPS) 5: Planning for the Historic Environment (2010), policy HE 3.1 requires that, in their Local Development Frameworks Local Authorities set out a "positive, proactive strategy for the conservation of the historic environment in their area". English Heritage supports the production of these SPDs which we hope will help guide development and change to support conservation of the historic environment.</p> <p>1.4 Overall we are pleased to see that the historic environment is addressed through these SPDs with relevant historic context sections in the background information sections. However, we have suggested some amendments below which we believe will strengthen them in regard of their compliance with PPS5.</p> <p>2. Building heights and tall buildings</p> <p>2.1 A significant omission in all of the SPDs is clear guidance on building heights and tall buildings. English Heritage/CABE's Guidance on Tall Buildings (2007) and the 2011 London Plan support a plan-led approach to tall buildings to ensure that they are located to maximise opportunities for good urban design and to avoid harm to heritage assets and their settings. While this approach has been established at a borough-wide level, where each of the SPD areas is identified as an area of tall buildings potential, there is an important role for the SPDs to refine this strategic designation through local masterplanning, and based on a more detailed understanding of the environmental characteristics of each area as required by PPS1. This is crucial for areas such as Woolwich where there is a concentration of heritage assets whose settings could be affected. A useful example to follow in this regard might be the London Borough of Wandsworth Site Allocations document.</p> <p>2.2 We suggest that explicit guidance is provided for each of the SPDs regarding building</p>

ID	Full Name	Organisation	Comments
			<p>heights, and possible locations for tall buildings which takes into account any impacts on heritage assets, their settings, the townscape skyline and locally important views. This should be supported with clear urban design evidence, including an understanding of the local historic environment.</p> <p>2.3 In each document it would be useful for the policy review to acknowledge that each SPD area is identified as a location of tall buildings potential, which explains the rationale for providing a building heights strategy.</p> <p>3. Archaeology</p> <p>3.1 Each of the SPDs cover areas designated as Areas of High Archaeological Potential yet archaeology has not been addressed as an issue in any of the documents. The banks of the Thames are particularly rich in archaeological findings due to the intensity of historic activity there, while Woolwich and Eltham Town Centres and the entire Peninsula have a long history of settlement and activity which could yield archaeological remains.</p> <p>3.2 Reflecting the Borough's unusually high archaeological potential we understand that it intends to adopt its draft document London Borough of Greenwich: Areas of High Archaeological Potential Appraisal, containing updated boundaries, character descriptions for each area, and short potential aspects for research. This is clearly a useful document for the purposes of strategic planning and decision making, and should be drawn on in each of the SPDs.</p> <p>3.3 We therefore recommend that Areas of High Archaeological Potential designations be identified in each of the SPDs, as set out in the Appraisal (together with a cross-reference to it), and that their sensitivity to development impacts be highlighted, drawing the character descriptions provided in the Appraisal. In addition, we would suggest that, where development proposals are concerned, the SPDs reinforce and encourage assessment of archaeological potential, reflecting the approach outlined in PPS5 and reinforced by the English Heritage London Archaeology Charter. If they fall within a designated area, applications should contain a Heritage Assessment to cover above and below-ground assets and sites outside of the Areas of High Archaeological Potential of 0.4ha or more in area should also be subject to the same process. If archaeology is a minor consideration then a statement in the Design and Access Statement should show that it has at least been considered.</p>

ID	Full Name	Organisation	Comments
			<p>4. Consistency with PPS5 terminology 4.1 In each document, to avoid ambiguity it is important to ensure consistency with PPS5 when formulating policies to addressing designated heritage assets, ie to seek to conserve their historic significance. For example, the Woolwich Town Centre SPD (page 100) should address designated heritage assets, and cover all asset types, including archaeology.</p> <p>Borough-wide policy framework 5.1 For clarity it would be useful to set out, in the introduction to each SPD, the Core Strategy policies which each SPD supplements.</p> <p>6. Design and heritage considerations 6.1 We welcome policies to promote public realm enhancements and high quality design. In doing so it is important to explicitly promote contextually-sensitive design, for example, in terms of materials, heights, typologies, heights, street furniture. This is particularly important where there are higher concentrations of heritage assets, such as in Woolwich Town Centre. English Heritage has provided a range of Guidance documents to show how this can be achieved, notably English Heritage/CABE's Building in Context (2001) and our suite of documents entitled Understanding Place (2010).</p> <p>8. Eltham Town Centre SPD 8.1 Orangery Square (page 20): we suggest that the illustrative masterplan shown should identify the Grade II* listed orangery whose setting could be affected by proposed development. The corresponding text should highlight the need to ensure that the scale and form of development in the square and its landscaping should be appropriate to the nature and setting of this heritage asset. In addition, we question whether the accompanying visualisation conveys the type of development which would be appropriate to the more intimate character of the Orangery.</p>
50	Mr David Hammond	Planning and Advocacy Adviser Natural England, London Region	<p>Thank you for your correspondence dated 31 January 2012, requesting Natural England's views and comments on the above consultation documents. Your letter has been passed to me as a member of the Land Use Services Team for response.</p> <p>Natural England is the Government agency that works to conserve and enhance biodiversity and landscapes, promote access to the natural environment, and contribute to the way natural resources are managed so that they can be enjoyed now and by future</p>

ID	Full Name	Organisation	Comments
			<p>generations.</p> <p>Natural England is supportive of initiatives to enhance and improve access to green spaces as well as provision of new green open space provision, especially in areas of deficiency for access to nature. Improvements to and realignment of the Thames Path National Trail, where appropriate are also welcomed and supported.</p> <p>The Masterplan proposals seek to encourage and provide new residential and economic opportunities within the selected areas. As part of sustainable development the Council should also seek to provide sufficient leisure and amenity resources also, new parks and green spaces should be considered, along with improvements and enhancements to existing sites.</p> <p>Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. This should be made more explicit in the Town Centre Masterplans and policies included to ensure the borough's green infrastructure is designed to deliver multiple functions.</p> <p>The council should consider the role of the natural environment as part of a sustainable developmental approach, together with energy efficiencies. As discussed above, incorporating the natural environment into the built environment can significantly contribute to climate change adaptation including through flood storage, reducing rainwater runoff and ameliorating the urban heat island effect. We recommend that the role the natural environment can play in climate change adaptation is drawn out further in the Masterplans, and policies included reflecting this.</p> <p>The potential for new and additional residential provision within the selected Town Centres/Areas can lead to increased pressure on existing resources, including leisure and amenity spaces Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system:</p> <ul style="list-style-type: none"> • No person should live more than 300 metres from their nearest area of natural green-space; • There should be at least one accessible 20 hectare site within 2 kilometres; • There should be one accessible 100 hectares site within 5 kilometres;

ID	Full Name	Organisation	Comments
			<ul style="list-style-type: none"> • There should be one accessible 500 hectares site within 10 kilometres. <p>This is recommended as a starting point for consideration by local authorities and can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some urban areas/authorities than other, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their Borough.</p> <p>Green Grid and Blue Ribbon</p> <p>The use of the existing natural signature of a borough can be used to help deliver Council objectives. Natural signature refers to the underlying landscape of an area, which if drawn out, can make a direct and powerful contribution to 'sense of place' and local distinctiveness. An example of this can be seen in the Wandle Valley Regional Park which has a natural signature of water meadows echoing the meandering course of the river, backed by bands of wet woodlands.</p> <p>Natural England has recently produced the London Landscape Framework which gives further guidance on the 'natural signatures'. We recommend that you refer to this document and ensure that it is reflected in the appropriate section of the Masterplans. The London Landscape Framework can be found at:</p> <p>http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx</p> <p>The Council should also look at the fragmentation of open spaces and the linking of them back to paths and other sites. This would also be in line with the councils aspiration to promote and encourage pedestrian and cycling opportunities for the Town Centres.</p>

ID	Full Name	Organisation	Comments
			<p>Below are general comments that may be of use for potential developments and developers in the areas, and are offered as advice.</p> <p>Local wildlife sites</p> <p>If proposal sites are on or adjacent to local wildlife site, e.g. Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) the county ecologist and/or local Wildlife Trust should be contacted.</p> <p>Protected species</p> <p>If representations from other parties highlight the possible presence, or the Council is aware of a protected or Biodiversity Action Plan (BAP) species on the site, the Council should request survey information from the applicant before determining the application. Paragraph 98 and 99 of ODPM Circular 06/2005 and Paragraph 16 of Planning Policy Statement 9 [1] provide information on BAP and protected species and their consideration in the planning system.</p> <p>We would draw the Council's attention to our protected species standing advice, which provides guidance on when protected species may be impacted by a proposal. The advice can be found at:</p> <p>http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/standingadvice/default.aspx</p> <p>Biodiversity enhancements</p> <p>Application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as those mentioned above. The Council should consider securing measures to enhance the biodiversity of sites from the applicant, if it is minded to grant permission for applications. This is in accordance with Paragraph 14 of PPS9. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.</p>

ID	Full Name	Organisation	Comments
51	Joy Leaver		<p>Some comments:</p> <p>1. It is important to have a good range of enterprises in the High Street, in size and quality, in order to retain money in the area instead of people having to go outside (eg. to Bromley, Bluewater or Central London). The vision should therefore concentrate on means to draw useful businesses in - more offices, workplaces, quality as well as cheap shops, for clothing and footwear, repairs including electrical goods, cleaners, haberdashery, stationery and art supplies, quality furniture and household goods. Boutiques and pseudocraft shops are not needed. There is no cinema.</p> <p>2. Parking. It is essential to have easy and cheap/free access on the High Street to shops and offices and facilities including community places, therefore the present arrangement should be retained. If this is lost, there will be additional aggravation in surrounding streets where people will leave cars while shopping.</p> <p>Parking in Passey Place is very well used and essential for use of the shops etc and the veterinary premises and access for taxis to Argos for those taking away heavy goods. It is not a good place for sitting in as it is in a wind gap onto the High Street.</p> <p>3. To increase living accommodation would be good, but there are already a number of former flats above the shops which might be drawn back into living space use and therefore help the High Street be less of a blank space after 5.30 pm.</p> <p>4. Development of 'squares' - it is doubtful if they would be long term success. The Grove Market area illustrates the problem of sites off the main part of the High Street - various developments have come and gone there.</p> <p>Development of the Orangery itself with workspaces nearby would be an asset. Any building higher than ground floor on the carpark at the back of Dobell Road would impact badly on the privacy of those houses. That carpark is not waste space; it is in constant use and only needs more green planting.</p> <p>5. Back lanes to the south and north of the High Street are most useful as quick access to the High Street without having to manoeuvre round crowds of shoppers, lingerers, children and people on their mobiles. The lanes should not be reduced by commercial expansion.</p>

ID	Full Name	Organisation	Comments
			Roper STreet School. The suggestion for redevelopment of the school in the site neighbouring the parish church does not look viable. It is doubted if there is space for both building and the play ground. It places children next to an extremely busy road (which will be even busier if the proposed 'Grove Market' developments take place); and would create a hazard at morning and after noon 'school run'times, on a road running up to a heavily used cross—roads which already creates long delays.
52	Sheila Squire		<p>1. Keep free 30 min parking in High Street</p> <p>2. Don't make pavements wider for 'coffee culture.' Our climate isn't appropriate and it would create a bottleneck for traffic and slow it down even more</p> <p>3. The Beadles site seems quite small to take Roper Street school</p>

Peninsula West

ID	Full Name	Organisation	Comments
1	Mr Paul Green		<p>I think it is interesting but I do wonder how great a demand there would be a second entertainment venue immediately next to 02. I recall that a venue in the Docklands area closed a few years ago as it was unable to compete. Also these large scale developments seem to do little to animate the local area. The developments on the Peninsula at the moment feel like ghost towns much of the time and the 02 mainly encourages people to drop in by Jubilee Line and then leave again without stepping foot out into the local area</p> <p>There does not seem to be any thought as to how the historical value of the area will be integrated into the masterplan. I work closely with local people and many have commented on the blandness of the development at Lovell's Wharf and how it removed some of the features that made the area so interesting. I feel that the historical and industrial legacy needs to be built into the plan.</p> <p>How well will the local infrastructure cope with such intensive development? The roads from Blackwall Tunnel are already frequently congested and this impacts on the very low air quality on nearby Trafalgar Road. After gigs at 02 the weakness of the bus service becomes apparent with people having to wait ages for buses.</p>

ID	Full Name	Organisation	Comments
2		Costco Wholesale	<p>This representation is submitted on behalf of Costco Wholesale UK Ltd (Costco) who operate a number of wholesale warehouse clubs throughout the country, typically located on employment land. Costco operates sui generis membership warehouses and was created to serve the wholesaling needs of the small to medium sized business owner. At Costco, businesses can purchase products at wholesale prices, which are significantly lower than those of traditional sources of distribution. Businesses can obtain most of their inventory needs from under one roof. Each warehouse sells a wide range of products, although the variety within each product range is limited. This enables Costco Wholesale to serve a wide range of businesses, providing a core range of products at low prices.</p> <p>Costco is a reputable employer and would assist Greenwich in achieving their Economic Prosperity objectives. The level of jobs provided by Costco compares favourably in employment density levels to traditional B Class Uses. The company provides local people with a broad range of quality jobs that reflect the unique nature of Costco's operations. In addition there would be indirect job creation through the support given to small local businesses.</p> <p>Overall in the UK, over 90% of the jobs created by a new Costco are filled by locally recruited staff. Throughout the company, staff are encouraged to undertake training and to improve their positions. 85% of Costco's current managers are home grown having worked their way up from hourly paid positions. Positions range from craft and operative jobs for which specialist training is given, to managerial and supervisory jobs and unskilled jobs, which provide a point of entry for those who have little or no qualifications or training.</p> <p>The benefits of a warehouse club such as Costco are that the positive impacts spread throughout the local economy. Costco's target customer is the small and medium businesses and many of these can be found in town centres. They include;</p> <ul style="list-style-type: none"> • Independent Retailers • Food and drink outlets such as restaurants and sandwich shops • Service outlets such as small estate agents, accountants, garages and professional firms • Independently owned hotels, guest houses etc

ID	Full Name	Organisation	Comments
			<p>Costco can therefore make a significant contribution to the health of the local economy and, particularly to small businesses that are otherwise forced to pay a premium for small purchases from traditional wholesale sources. Costco's prices and its range of products are unique in this respect.</p> <p>Costco has been seeking representation within Greenwich for over 10 years and has been unable to secure a site due to demand for housing development or landowner expectations of retail value. The Greenwich Peninsular an area appropriate for Costco due to transport links and the location of businesses, Costco's core membership base.</p> <p>Greenwich Peninsula West is currently allocated as an industrial area, but the emerging Core Strategy seeks to designate the area as a Strategic Development Location. In our opinion the emerging Masterplan does not retain sufficient industrial land to enable genuine employment uses such as Costco to come forward. Suitable uses in Strategic Industrial Locations are set out with the London Plan and include general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities, wholesale markets and other industrial related activities. Costco Wholesale has been found to be an appropriate use for SIL.</p> <p>Greenwich is a Borough which is classified by the GLA Industrial Capacity SPG as a limited transfer Borough. The emerging Draft Core Strategy and the Peninsular West Masterplan propose that the area of land allocated as SIL is significantly reduced. Costco considers that this may further reduce their ability to find a site and achieve representation within the Borough.</p>

ID	Full Name	Organisation	Comments
			<p>Representation</p> <p>Costco Wholesale objects to the Peninsula West Masterplan in its current form and seeks the reinstatement of land allocated for SIL and for the Council to recognise that there is demand for SIL in this location from companies who have the ability to offer significant employment such as Costco. Costco therefore requests that the Council considers the reinstatement of allocations of land for SIL in the recognition that sui generis uses suitable for SIL, such as Costco Wholesale, will provide employment.</p> <p>Costco may offer a suitable land use to provide a buffer between the identified wharfs, which can be noisy, and the proposed residential development. This would also enable the Council to maintain an appropriate level of land allocated as SIL in conformity with the London Plan.</p> <p>It is also questionable whether there is the market demand for a multi purpose complex. The Masterplan should provide for alternative employment uses in the event that there is no market demand for the proposed multi purpose complex development.</p>
3	Mr Patrick Blake	Highways Agency	<p>Thank you for your email on 31 January 2012 inviting the Highways Agency (HA) to comment on the Masterplan Consultations for Woolwich Town Centre, Eltham Town Centre, Charlton Riverside and Greenwich Peninsula West. The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. We have reviewed the Masterplans and do not have any comment at this time.</p>
4	Mr. Siebe Terband	chairman of the board Orange	

ID	Full Name	Organisation	Comments
		Connections Ltd	
5	Joe Aghomi	Environmental Health Tower Hamlets Council	The Greenwich Peninsula Master Plan which is the link below has been reviewed in depth Tower Hamlets Environmental Health will require additional information.i) Detailed Environmental Impact Assessment containing an Environmental assessment.ii) A Noise Assessment from a reputable Acoustic Consultant with adequate mitigation methods so as to overcome Noise Nuisance at all the sensitive residential facades in LBTH.iii) If our previous experience is to go by, then similar assessment was requested for the O2 venue.Until a detailed assessment is provided LBTH Environmental has objections to the open air plan, due noise breakout likely to cause noise nuisance to LBTH residents.
6	Ms Rose Freeman	The Theatres Trust	<p>The Theatres Trust is The National Advisory Public Body for Theatres. The Theatres Trust Act 1976 states that <i>'The Theatres Trust exists to promote the better protection of theatres.</i> It currently delivers statutory planning advice on theatre buildings and theatre use through the Town & Country Planning (General Development Procedure) (England) Order 2010 (DMPO), Articles 16 & 17, Schedule 5, para.(w) that requires the Trust to be consulted by local authorities on planning applications which include <i>' development involving any land on which there is a theatre . '</i></p> <p>We only have a few comments to make concerning future entertainment provision in these four areas.</p> <p><i>Peninsular West : Multi-Purpose Complex</i> – this is an excellent notion which will complement the O2. We are concerned however that public transport to this area will become stretched and suggest, if the scheme goes ahead, that parking provision is increased. Assuming that the proposed amphitheatre may be used for dramatic performances (in the summer) as well as for concerts, we would like to be consulted on the plans at the appropriate time.</p>
7	Ms Lucy Owen	Planning Officer Port of London Authority	<p>Thank you for consulting the PLA on the Greenwich Peninsula West Draft Masterplan SPD. I have now had the opportunity to examine the submitted documentation and would like to make the following comments:</p> <p>The PLA considers that the production of this document is premature given that the final version of the Core Strategy will not be available until Summer 2012. The Core Strategy will then be the subject of an Examination in Public and the Inspector will publish his/her findings. The approach set out in the Core Strategy is a departure from that in the current UDP and there is no certainty that it will be accepted by the Inspector. As highlighted in Chapter 8 The Policy Context of the SPD, "SPD's provide further detail on the implementation of particular policies and proposals contained in the Development Plan. SPD's must relate to policies or proposals in the Development Plan and they may not be used to set out new policies nor to allocate or re-designate land for specific purposes."</p>

ID	Full Name	Organisation	Comments
			<p>As such the PLA would assert that the production of a masterplan document which accords with a draft Core Strategy runs the risk of producing a document which will require substantial changes as the Core Strategy progresses, could potentially confuse members of the public and other consultees and will result in consultation overload.</p> <p>The introduction to the document sets out how the Council is seeking to release a number of land use safeguardings for industrial land and wharves and explains how the SPD will achieve this. Unfortunately the SPD is not based on any sound evidence and neither does it accord with National or <i>London Plan</i> policy or guidance. As such the SPD is fundamentally flawed and unsound.</p> <p>The PLA would dispute the claim that Vic Deep and Tunnel Refineries blight development in the western part of the peninsula by occupying developable land and by affecting neighbouring plots with noise and heavy freight traffic. Safeguarding had to be brought in to stop the steady loss of wharves to non cargo handling uses. Safeguarded wharves play an important role in the sustainable transport of freight by water, thereby taking heavy goods vehicles off of the road network. This approach is fully supported by National and <i>London Plan</i> policy. It has been demonstrated in many locations within London, including within Greenwich, how safeguarded wharves can sit side by side with non cargo handling activities and it is through good design that the potential for conflicts of use and disturbance can be minimised. The Council will be aware of the good working that occurred in relation to the proposed development at Enderby Wharf and how it was designed in accordance with London Plan policy to minimise the potential for conflicts of use and disturbance from Tunnel Wharf. It will also be aware of the good working that is currently taking place in relation to phases 3, 4 and 5 of Greenwich Millennium Village.</p> <p>The PLA would assert that the SPD's objectives are flawed and take a blanket approach to the Peninsula. They do not reflect the requirement of the Opportunity Area to recognise the roles of safeguarded wharves and they do not accord with National or <i>London Plan</i> policy.</p> <p>There appears to be some confusion about what is actually being proposed. The conceptual approach appears to retain the safeguarded Victoria Deep Water Terminal, although its boundary appears to be indicative. Bay Wharf then appears to be removed and replaced by 'entertainment' and the safeguarded Tunnel Wharf is lost to public open space and large waterfront development (which is assumed to mean housing). However other proposals are set out elsewhere within the document. Any proposed development on the Peninsula needs to accord with National and <i>London Plan</i> policy and Guidance.</p> <p>Safeguarded Wharves</p>

ID	Full Name	Organisation	Comments
			<p>The draft National Planning Policy Framework is clear on the subject of wharves and associated storage, handling and processing. It seeks for the safeguarding of existing planning and potential wharfage and associated storage, handling and processing facilities for the bulk transport by sea or inland waterways of minerals including recycled, secondary and marine dredged materials. It also seeks to safeguard “existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.” The London Plan protects existing facilities for waterborne freight traffic, in particular safeguarded wharves should only be used for waterborne freight handling use. This policy framework should be the starting point for the Council’s consideration of what types of development are appropriate and where they are appropriate within the study area. Unfortunately this does not appear to have happened and results in a very confusing document which appears to advocate a number of different things depending on which part of the document you are reviewing.</p> <p>It is only on reaching chapter 11 Key Issues that the 3 possible approaches to the safeguarded wharves are set out in a coherent way. However, it is not clear whether the document is advocating one particular approach or is leaving its options open. Ultimately any proposal advocated in the SPD needs to accord with National and <i>London Plan</i> Policy.</p> <p>The first option in chapter 11 recognises that Vic Deep is currently operational and that Tunnel Wharf is viable but not operational. It highlights the proposed boundary amendment as set out in the Safeguarded Wharves Report. The document considers that if both wharves are retained then the viability of the West Peninsula Site to contain a large event complex would be limited and improving landscaping and potentially a footbridge around the wharves would be essential. Whilst the Council may consider this to be the case, this is the only option that would accord with planning policy and would therefore be the only option that the PLA could support.</p> <p>The second option shows just Vic Deep safeguarded with two smart wharf facilities provided on Vic Deep. Bay Wharf appears to be removed. The document makes reference to a new ‘smart wharf facility at Victoria Deep Water Terminal and it is suggested that Tunnel Wharf is relocated here. However Vic Deep is an operational Wharf, how could the capacity of Tunnel Wharf be relocated and combined with the existing capacity of Vic Deep?</p> <p>The final option looked at is Vic Deep reduced. This option also appears to advocate the loss of Tunnel Wharf and Bay Wharf. Again given that Vic Deep is an operational Wharf, how could the capacity of Tunnel Wharf be relocated and combined with the existing capacity of Vic Deep?</p> <p>It would appear that option 2 and 3 might be seeking relocation of the two wharves onto one wharf because the SPD seeks to</p>

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			<p>remove “unnecessary land based processing.” The vast majority of wharves undertake some on-site processing activity and as highlighted in the Safeguarded Wharves Review “while strictly speaking, separate from the transport function of the site, co-location of these processing activities on the wharf site is generally considered to be critical to the economic viability of both the wharf itself and also the river transport itself”</p> <p>The draft National Planning Policy Framework is also clear on the subject of wharves and associated storage, handling and processing. It seeks for the safeguarding of existing planning and potential wharfage and associated storage, handling and processing facilities for the bulk transport by sea or inland waterways of minerals including recycled, secondary and marine dredged materials. It also seeks to safeguard “existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.”</p> <p>Options 2 and 3 would therefore not be appropriate and would not accord with Planning Policy and Guidance and would result in an unsound plan.</p> <p>The London Plan is also clear when it comes to safeguarded wharves that the redevelopment of a safeguarded wharf for other land uses should only be accepted if the wharf is no longer viable or capable of being made viable for waterborne freight handling. No evidence has been put forward to demonstrate that the wharf is not viable and in fact the SPD acknowledges that Tunnel Wharf is viable. The Safeguarded Wharves Report also considers that Tunnel Wharf is viable. Whilst consolidation/relocation could be investigated and is sought by the SPD, no evidence has been advanced setting out how this could be achieved and how any relocated wharf would have the same, if not better facilities and capacity.</p> <p>Finally, any concourses/riverside walks around Vic Deep should not be located on the wharf itself i.e. it should be located outside of the safeguarded wharf boundary.</p> <p>Support Facilities</p> <p>As the Council is aware, Thamescraft Dry Docking Services Ltd are due to relocate their existing operations to Bay Wharf. This move is as a consequence of the redevelopment of Lovell’s, Granite, Badcocks and Pipers Wharves. Much time was spent by many parties ensuring that a fit for purpose boat yard was provided and it is therefore surprising that the Council is now seeking to lose this important facility to ‘entertainment’ (options 2 and 3 for the safeguarded wharves show the removal of Bay Wharf). As the Council will be aware <i>London Plan</i> policy seeks to protect waterway support infrastructure such as boatyards and research</p>

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			<p>commissioned by the Mayor in 2007 highlighted how there was a particular shortage of boatyard facilities that are capable of inspecting, maintaining and repairing the larger passenger craft on the Thames. The London Plan therefore seeks to promote these facilities.</p> <p>Any loss of Bay Wharf would not accord with planning policy and results in an unsound SPD.</p> <p>Temporary Use</p> <p>Given the status of the document it is questioned why there is reference to temporary uses during the Olympics – by the time the document is published it is likely that the Olympics will have finished. A beach is proposed adjacent to Vic Deep the PLA is in discussions with the Council about this at the moment.</p> <p>Conclusions</p> <p>The PLA would reiterate that the SPD is premature, does not accord with National or <i>London Plan</i> policy or guidance, particularly in relation to the safeguarded wharves and waterway support infrastructure. As such the SPD is unsound.</p>
8	Mr Frank Dekker	Director Peninsula Festival	Great plan, we look forward to working with the Royal Borough and developers as these ideas will progress.
9	Mr Simon Hall		<p>I am a resident of Charlton Riverside, living very close to the border with the area covered by this Masterplan. Most of my comments are covered in my response to the Charlton Riverside plan - and my points regarding the use of the river and piers apply here too.</p> <p>I have two main comments on this Plan:</p> <p>I. I cannot understand why the Council are proposing a new stadium venue. It was not long ago that the Council were instrumental in securing the new Valley site for Charlton Athletic that could certainly have its uses expanded. Having two stadiums so close to each other does not appear to be sensible. The area covering the Valley is outside any of the Masterplan areas, but would certainly benefit from being looked at in terms of development. Please prioritise keeping the Valley and not jeopardising it by having a new</p>

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			<p>venue built extremely close to it.</p> <p>2. The whole of the Greenwich Peninsula suffers from the traffic blight associated with the Blackwall Tunnel. Having the O2 arena there has actually added to this, and as a local resident I am often stuck on stationary buses that have been caught in the gridlock that follows a breakdown in the tunnel or the attendees at an O2 event leaving. I think that the whole issue of public transport has been inadequately covered in the Masterplan. The silvertown tunnel is a TfL proposal that is subject to a separate consultation (and, in my view, will merely add to traffic problem); the DLR extension proposal referred to is inordinately expensive as it involves large stretches paralleling the A102/A2 on stilts and is therefore highly unlikely; the GWT status - for either scheme - is also unclear to me. There was an extra platform with a loop put in to enable further expansion of the Jubilee Line from North Greenwich - and this has not been alluded to here. What are the plans the Council would like to see for that? The DLR could be extended much more cheaply - potentially into Charlton Riverside and through to Woolwich or down to Eltham from there. Lewisham Council also has produced a plan that could extend the Bakerloo Line - and that is never referred to as a potential for this area (Westcombe Park did feature in one of its iterations). This Masterplan needs to address the problems with both car use and public transport on the peninsula for both traffic originating/ending on the peninsula or transitting through it. Please can you address this in the next version?</p>
10	Mr Joel Morris	Lands and Planning Manager Hanson Quarry Products	<p>I am submitting my company's representation to the Masterplan consultation.</p> <p>Hanson own and operate Victoria Deep Water Terminal (VDWT) which forms a significant part of the land which is covered by the Masterplan and would be adversely affected by the proposals. We consider many of these proposals to be flawed and urge rejection of the Masterplan and a complete re-think of the strategy.</p> <p>I. Background</p> <p>Hanson Quarry Products Europe Limited operates an aggregates wharf at Victoria Deep Water Terminal, Tunnel Avenue, London SE10 0QE. This is a Safeguarded Wharf within the Port of London and is a particularly valuable site because it provides 'Deep Water' berthing facilities meaning that the berthing of vessels is not limited by tides. In planning terms, the site has established use for the transhipment of goods and benefits from unrestricted working hours.</p> <p>Various materials are imported including hard stone from Northern Ireland, stone from Scandinavia and marine dredged sand and gravel products. The marine dredged materials are initially received at our Dagenham wharf before being processed in the depot and loaded on to barges for onward shipment to VDWT. The activities carried out at VDWT are one part of a complex operation to</p>

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			<p>bring heavy building materials to the centre of London in a sustainable manner.</p> <p>In addition to the wharf operation, there are a number of secondary activities taking place on the site from the production of concrete to the recycling of concrete and other building materials. All these activities involve lorry and barge movements including loading and unloading on the site and the use of other fixed and mobile plant and machinery.</p> <p>2. Responses to the Masterplan</p> <p>2a. Responses specific to Victoria Deep Water Terminal</p> <p>It is difficult to provide a succinct response to the Masterplan proposals because it seems to have scant consideration of National and Local Planning Policy as far as our site would be affected. The Masterplan has little or no regard for the valuable contribution made by VDWT to the sustainable transport of heavy building materials into central London by river. It correctly identifies Greenwich Peninsula West as having 'unique design and other opportunities' due to its Thameside location. Surely the greatest unique opportunity for riverside land is use as a wharf to encourage sustainable transport?</p> <p>In Section 02 - it is stated that VDWT blights other development by occupying developable land and affecting neighbouring plots with noise and heavy vehicle movements. We categorically refute this baseless broad-brush statement that is presented without any evidence. Development goes on in many locations in close proximity to operational wharves and it is for the local planning authority to ensure, in the case of a safeguarded wharf, that any adjoining development is appropriate and incorporates suitable mitigation measures so as not to adversely affect the economic viability of the wharf operation.</p> <p>In Section 11 - Key Issues, it is proposed that VDWT could be operated more "smartly" thus releasing space which could be used to accommodate other wharf users. The authors appear to be proposing that secondary processes could be undertaken elsewhere thus the aggregates that are brought into VDWT could be loaded on to lorries and transported off to another site where the secondary processes would take place. This would be a wholly inefficient and unsustainable change to the current processes and would undermine the economic viability of the wharf operation. National Planning Policy supports the location of secondary mineral processes at or alongside mineral wharves. Furthermore, VDWT is fully utilised and there is no capacity to relocate secondary processes 'elsewhere' to make space for other occupiers.</p> <p>Therefore, Scenario 2 of Section 11, which proposes two operators 'smartly' accommodated within the boundaries of VDWT, is not</p>

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			<p>viable.</p> <p>Scenario 3, suggests that operations at VDWT could be reduced to accommodate a 'green space'. This does not comply with the Safeguarded Wharf status under the London Plan, so should not even be suggested.</p> <p>2b. General Comments</p> <p>The Masterplan proposes the partial loss (de-designation) of some Greenwich Peninsula West Strategic Industrial Land (SIL) which is at odds with planning policy. Indeed the Greater London Authority has already informed Greenwich Council that such loss does not conform with the London Plan. The land adjoining VDWT is currently SIL and, generally, industry is a compatible neighbour to a working wharf so this land should, therefore, remain SIL and not be de-designated.</p> <p>In section 04 Development Principles, a multi purpose sports/education/leisure facility is identified as a catalyst for future development but no evidence is put forward to demonstrate that there is even any demand for such a facility. It seems illogical to base a masterplan around a concept for which there is no proven demand and to simply state that further research into the feasibility would be required. Later, in section 11, the narrative goes on to explain that if the initial concept were not feasible, in effect, the rest of the masterplan would probably work anyway. This seems a remarkably naive way to guide redevelopment and we suggest it is flawed.</p> <p>It is not clear how any of the schemes could work. We understand that in general, planning policy is to be founded on a basis that it is 'deliverable' i.e. there must be some realistic achievability to the proposals and they should be implementable. As set out above, some of the Masterplan proposals cannot be implemented because, in the case of Victoria Deep Water Terminal, the land is already fully utilised for a purpose that accords with national planning and London Plan policy.</p> <p>3. Conclusion</p> <p>Greenwich Council should be giving more consideration to protecting Victoria Deep Water Terminal from the effects of redevelopment, by ensuring any development is appropriate to sit alongside a working wharf, rather than proposing a reduction to the operation of the wharf to make it fit in with the Masterplan.</p>

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11	Mr Bob Harris		<p>In welcoming the master planning approach and the opportunity to comment on the proposals and in assuming that this masterplan does not revoke any of the established strategic plans of the borough I would like to suggest the following. Peninsula West must be considered in the wider context of the rest of the Peninsula and strategic links to historic Greenwich and Charlton Riverside. Both a personal view and an informal Ravensbourne view would urge that the opportunity to provide space for employment purposes and for the creation of SME's and single handed practices particularly in the digital field and those potential entrepreneurs in creativity. Cognisance should be made to create flexible smart connected reasonable priced workspace perhaps adopting a similar model as the Ravensbourne eco incubator. In building a significant digital cluster move on space will be needed or the right facility and square footage. It is essential to retain the entrepreneurs and innovators being trained in Greenwich Digital Skills to grow and accelerate new creative digital business. In addition the council through its planning incentives should ensure the appropriate digital infrastructure be established to ensure that the area can compete in the 21st century thus providing opportunity for both digital creative practice and for smart manufacturing. Beyond this some further note should be taken to ensure that this master plan stimulates the linkages between Greenwich Town Centre and the wider Peninsula.</p> <p>I believe there is opportunity to describe a 'creative or cultural corridor' celebrating both historic Greenwich and the new international 'modern destination' of the North Greenwich Peninsula as well as stimulate a 'Shoreditch style of digital community' in the East Greenwich area. The area has tradition and classic industrial feel that with care to protect some of the fine industrial archeology and the chance to regenerate could deliver a mixed but more sustainable development. There needs to be a mixture of spaces for employment uses with affordability being a key driver to deliver a creative 'quarter' surrounding the higher value land of historic Royal Greenwich and the Peninsula square. The digital high growth high level skill stimulus of Ravensbourne and Greenwich Digital Enterprise Centre will be a clear opportunity to develop a new economic strand to compliment heritage and tourism and commercial development already established or already planned. Care must be taken not to design out flexibility and a breadth of uses. The need to stimulate innovation and the SME sector is paramount adding prosperity and complementarity to the established business in the Greenwich area and reverse years of industrial decline</p> <p>I would say the same of Charlton Riverside (and would ask this to be registered within that consultation) where there is already an established creative community. A Halo effect stemming from the success of the O2 and Mitre passage with more classic commercial space to be built out needs to be encouraged and planned and designed for building critical mass, a strong brand, high growth and skills and future prosperity.</p> <p>Otherwise I welcome some of the comments and ideas around more potential arena use, the consideration of the use of wharves</p>

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			and the need to continue to enhance public transport linked to North Greenwich Bob Harris
12		Morden College Trust	<p>We write on behalf of our client Morden College in order to submit representations to the draft Greenwich Peninsula West Masterplan SPO dated February 2012,</p> <p>1. Morden College</p> <p>1.1 Morden College (the College) is a long-standing charity which provides residential care in Blackheath, south-east London, The College has been helping the elderly suffering financial hardship for more than 300 years. When it was founded the residents were housed in the College, but today a range of accommodation is provided comprising independent living, sheltered housing, and a Nursing / Residential Care Home. The College is the freehold owner of a substantial area of land on the western side of the Greenwich Peninsula</p> <p>2. Draft Greenwich Peninsula West Masterplan</p> <p>2.1 On the basis that all of the land owned by the College in the western part of the Greenwich Peninsula is covered by the Draft Greenwich Peninsula West Masterplan, we comment as follows:</p> <p>Introduction and Vision — SIL, Safeguarded Wharves and Mixed Use Development</p> <p>2.2 The document sets out in the introduction that, "The Royal Borough of Greenwich is seeking to release a number of land use safeguardings for industrial land and when/es, to create a new and exciting mixed use area which includes leisure, education, employment and housing",</p>

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			<p>2.3 We welcome the ambitions of the Council in relation to the release of Strategic Industrial Land (SIL) currently identified in the draft Core Strategy Proposals Map as part of the Greenwich Peninsula West SIL and the 2011 London Plan.</p> <p>2.4 In addition, we support the proposed release of the safeguarded wharf status of Tunnel Glucose Wharf and the consolidation of safeguarded wharf uses at Victoria Deep Water Terminal, thereby also leaving Tunnel Wharf free from potential safeguarding. This is consistent with our recent representations to the Greater London Assembly in relation to the consultation draft of the 2011/2012 Safeguarded Wharves Review.</p> <p>2.5 Furthermore we welcome the aspirations of the Council for a mixed used approach to the area including leisure, education, employment and housing, but as worded, the range of uses identified in the introduction is not consistent with the full range of uses identified later in the document such as hotels identified on page 36, retail identified on page 40 and 53, and restaurants identified on page 44 and 53. As part of a genuine mixed use scheme, we agree that there may be opportunities for this wider range of uses. We would therefore request that these uses are reflected and clarified in the introduction and vision sections of the document, as these uses could well play an important role in the successful delivery and future regeneration of the area.</p> <p>3. Key Objectives and Themes</p> <p>Sports/Leisure/Education Complex and the Outdoor Event Alternative</p> <p>3.1 We note that in "Objective 1", "Development Framework Key Principle 1" and in the "Urban Form" section, pages 32 to 40, the document identifies the focus for the redevelopment of the masterplan area as a multi-purpose "Sports/Leisure/Education Complex" which incorporates a large event/stadium facility.</p> <p>3.2 Whilst we support a mixed use scheme, we would question the deliverability and financial viability of a concept that appears to be based on an American style model which is unproven in the UK. This is supported by the fact that the College, as landowner, have not been approached by parties who would be in a position to deliver a scheme of the type outlined.</p> <p>3.3 We would therefore suggest that further information needs to be provided on the feasibility and deliverability of the proposal, along with a clearer articulation of the potential leisure and educational institution/university users.</p>

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			<p>14 On page 82, the document identifies an "Outdoor Event Alternative" which would apply if the multi-use "Sport/Leisure/Education Complex" proved to be unfeasible. It is suggested that this alternative would incorporate an elite sports complex or university faculty "in lieu of the large event facility" and additional large scale residential uses in the zone where the large event facility would be located.</p> <p>3.5 Again, further information on the deliverability and financial viability of a facility for an elite sports complex or a university faculty is required. However, given that it is recognised on page 82 that the "Outdoor Event Alternative" would have similar benefit to the multi-purpose "Sports/Leisure/ Education Complex" and would appear to be more deliverable in terms of the mix of uses, we suggest that this is given equal prominence in the document. This could be achieved by bringing forward the information on page 82 of the document to form part of the "Development Framework" section, as well as being referred to in the "Objectives" section.</p> <p>3.6 In either the "Outdoor Event Alternative" or "Sports/Leisure/ Education Complex" option, we would also suggest that more emphasis is placed on flexibility in terms of phasing, uses and deliverability to ensure that changes in the market can be responded to.</p> <p>Large Riverfront Development and "Multi-Use Building Blocks"</p> <p>3.7 The document clearly sets out the ambitions of the Council to incorporate large scale residential riverfront development in the masterplan, and we fully support this land use principle.</p> <p>3.8 We also note that in the "Urban Form" section however, that the residential space is proposed to be delivered via large "U" shaped "multi-use building blocks", which could also include a mix of ground floor uses in a courtyard type format. With regard to this concept, while a "U" shaped solution may be appropriate, we would suggest that more emphasis is placed on flexibility in terms of design, so that any scheme would be assessed in the context of a full design process and is able to respond to appropriate deliverability requirements in terms of phasing, funding and financial viability.</p> <p>Mixed Use / Small Industrial Uses</p> <p>3.9 We welcome the employment led mixed use development identified in the masterplan in the area between the large scale riverfront residential uses and the A102, as this will act a useful buffer between the noise and pollution generated by the A102 and</p>

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			<p>the proposed residential uses on the river front.</p> <p>3.10 We note however that, the mixed use development is proposed at various points in the document to incorporate smaller industrial space, live/work units, housing, smaller workspaces, large format laboratories and engineering workshops. In terms of the proposed mix of uses for this area, we would suggest that the exact mix must be flexible enough to reflect market need. We would therefore suggest that where reference is made in the document to specific commercial uses in this area, this is caveated by inserting "...or other employment generating uses" so that this flexibility can be achieved and the deliverability of the proposed development can be enhanced.</p> <p>Transport and Movement</p> <p>3.11 We note that "Objective 4" in the document is to improve the transport and pedestrian links in and around the masterplan area, and the document states on page 18, that this could be achieved via the DLR extension, new cable car service, Thames Clipper stop at Enderby Wharf, improvement in local bus routes and Silvertown tunnel. We welcome the proposed improvement in multi modal transport services into, through and out of the masterplan area. This is consistent with our representations to the Thames River Crossing Consultation being undertaken by Transport for London.</p> <p>3.12 We also support the current proposals for a road traffic tunnel linking Greenwich and Silvertown, and have submitted representations to the recent Transport for London public consultation on this basis. We note however, that this project is incorrectly identified in the Masterplan on page 18, as a road linking Greenwich and Blackwall, and would therefore suggest that this is corrected.</p> <p>3.13 We also note that the DLR extension shown in the map on page 19, appears to link West Silvertown with North Greenwich. We are not aware proposals for this particular link, but would welcome it as part of a wider package of multi modal transport improvements.</p> <p>Key Constraints</p> <p>3.14 We note that there are a number of significant constraints to the delivery of the proposed masterplan (ie. the uses by Brenntag and Southern Gas Networks), which restrict the ability to develop on large parts of the masterplan area as a result of Health and</p>

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			<p>Safety Executive land policy.</p> <p>3.15 in this regard, Brenntag is a longstanding lessee of the College, and we are committed to work with all relevant stakeholders to deliver an appropriate solution to the future redevelopment of the Western part of the Greenwich Peninsula.</p> <p>4. Summary of key points</p> <p>4.1 We summarise our key points below :</p> <ul style="list-style-type: none"> • Release Strategic Industrial Land — We welcome the proposed release of Strategic Industrial Land designations in order to realise the regeneration and redevelopment of the masterplan area. • Consolidation Safeguarded Wharves — We support the proposed release of Safeguarded Wharf designations that would enable other uses to be developed in the masterplan area • Mixed Use Masterplan — We welcome the aspirations of the Council for a mixed used approach to the area including leisure, education, employment and housing. We would suggest that the flexibility to include retail, hotel and restaurant uses within the masterplan area is made clearer in the document at the outset. • Sports/Leisure/Education Complex and the Outdoor Event Alternative — We question the deliverability and financial viability of the "Sports/leisure/education complex" proposal_ We would therefore suggest that further information needs to be provided on the feasibility and deliverability of the proposal, along with a clearer articulation of the potential leisure and educational institution/university users_ We also believe that the "Outdoor Event Alternative" may represent a more achievable option than the "Sports/Leisure/Education complex" and so the two options should have equal prominence in the document_ • Mixed use area to include Employment Generating Uses in order to respond to the market - In terms of the proposed mix of uses for this area, we would suggest that the exact mix must be flexible enough to reflect market need. We would therefore suggest that where reference is made in the document to specific commercial uses in this area, this is caveated by inserting "...or other employment generating uses" so that this flexibility can be achieved and the deliverability of the proposed development can be enhanced • Greater Emphasis required on the Phased delivery of the masterplan — Given the uncertainty around funding, viability and delivery of the masterplan, we suggest that more emphasis is place on how the masterplan could be phased to ensure flexibility in terms of delivery.

ID	Full Name	Organisation	Comments
			<ul style="list-style-type: none"> • Greater Emphasis on implementation, Feasibility, and Financial Viability — Throughout the document we believe more emphasis should be placed on how the proposed masterplan uses will be implemented, and further information should be provided on the feasibility and financial viability of the proposed uses, in particular the "sports/leisure/education complex" in a UK context. <p>We trust that these comments will be taken into account as part of the consultation process and would be grateful if we could be kept informed and advised of the next stage of the Greenwich Peninsula West Masterplan preparation at the earliest opportunity. Should you have any questions in the meantime, please do not hesitate to contact Graham Bates or Alexander Gillington of this office</p>
13	Dr Pamela Percy		<p>Greenwich Peninsula West Masterplan SPD</p> <p>The Heathway Residents' Association were pleased to attend the Consultation on the above on Thursday 23rd February. We welcome the consultation process and have examined the detail of the Plan with great interest. No doubt you will receive a number of specific comments on these proposals, here we wish to draw attention to the need for borough-wide coherence.</p> <p>The Objectives of the Plan are listed in the document and we note particularly</p> <p><i>4 To improve transport and pedestrian links into and out of and through the area.</i></p> <p>Yet we find little specific evidence of how this laudable objective is to be fulfilled.</p> <p>It is already evident that Trafalgar Road, Charlton Way, Shooters Hill Road, A2 and A102 are highly congested. The plan proposes a number of major projects, including an additional 2000 homes, a sports/leisure/education complex and a large riverfront development. Many of these elements will require parking facilities, especially the sports complex; all these elements will generate traffic to clog already congested roads. There are consequences here for the whole borough. We are particularly concerned about the effects on the tributary routes to the peninsular.</p> <p>We note the possible development of a Blackwall to Silvertown tunnel, but this, when it is constructed, will do little to alleviate congestion and may even attract additional traffic.</p>

ID	Full Name	Organisation	Comments
			<p>We note that according to the plan, a number of existing businesses will have to be relocated, though no indication is given of where this would be.</p> <p>In our view there is a pressing need for greater coherence in the traffic management elements of these proposals.</p> <p>We look forward to further consultation in the later stages of this planning exercise.</p> <p>Yours faithfully,</p> <p>Linda Hodgson</p> <p>Chair Heathway Residents' and Neighbourhood Watch Association</p>
14	Mr John Franklin	Planning Adviser Greenwich Society	<p>The Greenwich Society warmly welcomes the Greenwich Peninsula Masterplan – and congratulates Lifschutz Davidson Sandilands and the Council on this positive and proactive form of planning, and stimulating vision, which completes the planning of the Greenwich Peninsula. The Society offers the following comments:</p> <p>Objectives and Conceptual Approach :</p> <p>These appear fine, with the expanded mix of uses in general to be supported. We wonder, however, whether the proposals for the Peninsula go far enough, and whether perhaps an even broader vision might be considered. For instance, a major problem at the Peninsular, drawn out by these proposals is the divisive nature of the A102, and we wonder whether the possibility of burying some of this has been, or might be explored. This would be costly, but with the construction of the new tunnel which will need to sink down early to avoid carving a huge swathe through the Peninsular East, the opportunity might be there to bury, or at least part bury,</p>

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			<p>a stretch of the existing road. This would open up a real opportunity to properly link east and west parts of the Peninsula, plus giving significant new development opportunities over the tunnel or cut-and-cover. See also our final thought and suggestion below. Apart from this, we are concerned over a number of things, particularly with regard to the scale of proposed new development in the light of the additional effect this would have on the local infrastructure which is already evidently under strain, on open space provision to meet local community needs, and the impact on local primary school needs.</p> <p>Movement :</p> <p>We strongly support the reference to proposals for an additional road link from Blackwall to Silvertown and extension of the DLR – but we don't see how this major infrastructure improvement, if ever achieved, would benefit the local area of the Greenwich Peninsula West or relieve the two main distributor roads Blackwall Lane and Trafalgar Road, which already get very congested at times: nothing is said about the impact of the development proposals on the local roads. The only reference here is with regard to public transport – and here we would query the references to “a successor to the Greenwich Waterfront Transit” (Movement, p. 18 & Transport, p. 36). [Whilst it was understood that funds had been earmarked for this in 2006, we have been given to understand more recently that the Waterside Transit had been dropped owing to the difficulties regarding its route through East Greenwich and along the A206: is this true?] It would appear that the only practicable public transport provision would be just an ordinary bus service along the route shown on the layout plan on pp. 22/23 coming from Christchurch Way. Whilst strategic links are good, we are concerned at the impact all this new development will have on the local roads, particularly the bottlenecks at the junction of Blackwall Lane and Trafalgar/Woolwich Road and Christchurch Way Trafalgar Road. In our view, before the Masterplan is adopted, the extra traffic load on these junctions resulting from the plan should be assessed (with and without the Silvertown tunnel), and remedial measures/alternative routes examined.</p> <p>Development Framework :</p> <p>Key Principles: It is noticeable that the key features of the Masterplan do not include for any primary school facilities. The main layout plan (pp 22-23) indicates an area in the vicinity of the proposed multi-use complex marked for ‘education facilities’, but this is qualified on p.24 to relate to ‘university’ use – this spelt out on pp 40-42. Surely there will be a need to provide educational facilities at the pre-school/infants/junior level, given the number of children that will result from not only the residential elements of this draft proposal but also from the 10,010 new units on the Peninsula. The Millennium Primary school was designed to cater for children in</p>

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			<p>the Greenwich Millennium Village but since the number of units there has grown from the 1,377 originally intended to the a new total of 2,243, as seen in the recently approved completion phases application, it is clear that the Millennium Primary School will be unable to cope. We consider that there is need for the masterplan to address this point</p> <p>Layout plan: [pp 22-23] The layout plan shows a strip marked 'public open space' along the riverfront – this containing the Thames Path. With regard to the latter, it is unfortunate that no attempt seems to have been made to seek to continue the Path along the frontage of “the safeguarded wharf”: it is forced at this point to take a detour inland here away from the river. In our view the plan should make it a priority to find a way of continuing the Path on or close to the river frontage. The plan already envisages reducing current operations at Victoria Deep Water Terminal to accommodate wharfage operations only, with two 'smart wharf' facilities. We question whether this is ambitious enough, for a long-term vision; options should be considered such as a split-level solution, with either a footbridge for pedestrians/cyclists or a conveyor to carry wharfage operations over the Path (as happens further downstream), or, as a minimum, part-time opening of the direct Path route when the wharf is not actually operating. These would need to be pursued with present and future operators.</p> <p>Multi purpose sports/education/leisure complex: This, planned to accommodate “up to 40,000 patrons”, is a very interesting idea, but raises the question as to <i>how</i> the area is to cater satisfactorily for the vehicular and pedestrian movement that would be generated: this is not adequately dealt with. We note the admission, “Analysis of the nearby current and proposed transport facilities is required to assess the feasibility of handling crowds attending larger events.” [Urban Form, Transport p.35]. Whilst unhappy over the scale of this proposal, we would support the development of sporting facilities provided that they are – as stated as intended (p.42) – available to the local community. There is a need for youth facilities in this area, and if this new development can also support this, all to the good – it would be helpful in making Greenwich a better place in which to live. We feel that such a very large venue should really only be contingent on (i) The DLR link being realized (ii). No further parking provision being make available on the Peninsular to ensure that this becomes a public transport only venue.</p> <p>Large Riverfront Development: More information needed; particularly on the number of housing units, and proportions of affordable and family units to be provided. It would appear that perhaps there could be up to 1,000 new dwellings here as a result of the proposals, which would increase the local population by a further 2,380 or so (at the London Plan overall ratio of 2.38 persons per unit). Should the proposed sports/education/leisure complex fail to materialise, the number of new dwellings, on the showing of the “Outdoor Event Alternative” [Key Issues, p.83], is likely to rise to over 2,500 new dwellings</p>

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			<p>Delivery :</p> <p>Implementation: It is stated that “early implementation could take place in the south of the Masterplan area”, but we are concerned that this is too vague: we feel that some indication should be given regarding timing and phasing of the proposed development.</p> <p>Pipeline :</p> <p>Future developments: These include the Hotel and Ballroom facility (within the Greenwich Peninsula Masterplan area) but not Meridian Gardens at the northern end of the area (also within the Greenwich Peninsula Masterplan area), and in particular Plot NO602 for which planning consent has been granted: this, surely, needs to be mentioned.</p> <p>Key Issues :</p> <p>HSE Land Use Policy: Reference is made to the external gasholder possibly becoming a feature of the Masterplan once decommissioned (p 80): but no specific uses are identified, and we wonder why not? We consider that the Masterplan should give some indication, and some examples of possible alternative uses here.</p> <p>Outdoor Event Alternative: We would support the ‘Outdoor Event Alternative’ shown on pages 82-83 – again, provided the facilities are available to the local community; but we note that, in this case, it would mean yet more ‘high density development’, creating even more pressure from traffic on the local infrastructure. We suggest that the area of public open space shown to be provided, alternatively, be provided just north of the Enderby Wharf site in order for it to be better located to serve the developing new local community. Greenwich Peninsula West needs to be considered as an extension of the East Greenwich residential area north of Trafalgar Road. We note that this area is identified in the UDP as an Open Space Deficiency Area. We consider that development of the Greenwich Peninsula West Masterplan area should include the provision of a proper Community Open Space to meet this area deficiency.</p> <p>Temporary Use :</p> <p>Reference is made to the Greenwich Olympic Festival offering a variety of temporary uses during the Olympics, but nothing is said about the possibility of temporary uses on vacant lands in the area <i>after</i> the Olympics and pending prospective permanent</p>

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			<p>development. We feel that this should be addressed.</p> <p>A final thought, suggestion and Query :</p> <p>The Proposals for Greenwich Peninsula West take in, at the northern end, proposals already agreed as part of the approved Greenwich Peninsula Masterplan – and we have suggested a possible better linking of the West and East areas in our first paragraph above. We feel that this gives an opportunity to look at the Peninsula as one whole – a complete unified new town. In the interests of developing unity and a sense of place, we would like to advocate that, besides covering over part of the divisive A102, attention be given to down-scaling Millennium Way. This also is divisive, an unattractive and massively over-scaled road, and even when the Peninsula is fully built we are doubtful that a dual carriageway is really justified. If we can manage without one elsewhere in Greenwich then the Peninsular could too, and this would enable the development of the area with some proper urban scaled streets, making it more person-friendly, walkable and cycleable and allowing development to be built up to the new street or boulevard with a proper urban edge, mix of uses and street trees. Currently the Peninsular is dominated by its traffic infrastructure, and this over-provision for vehicular traffic militates against a real sense of ‘place’ developing. Now is a golden opportunity (before it is too late) to do something about this.</p> <p>Query: What is the position with regard to Secondary School provision? We note the growing population proposed for the Greenwich Peninsula West, Greenwich Peninsula Masterplan and Greenwich Millennium Village areas (which we calculate to be in the region of some 15,000 new homes) – and see that a further 7,500 new homes are being proposed in the Charlton Masterplan area adjoining: we presume the plot adjacent to Millennium Way in the Greenwich Peninsula Masterplan area for which planning consent has been granted for the proposed Secondary School there is still to be used for that purpose, but will that site now be large enough?</p>
15	Stephen Kavanagh	Chief Executive Charlton Athletic FC	<p>I have now had the opportunity to review the Council's proposals for the Greenwich West Peninsular area.</p> <p>In broad terms, Charlton Athletic FC welcomes the re-zoning of this prime waterfront area in a planning context from light industrial usage to sport and leisure and ancillary usage.</p> <p>Naturally the club has concerns regarding the possible future use of the proposed arena particularly in the light of the situation which has been played out over a protracted period of time in relation to the Olympic Stadium at Stratford and the effect of that on three football clubs - Leyton Orient FC, Tottenham Hotspur FC and West Ham United FC. The club would like to have early discussions with the Council regarding the future planned use of the arena and what it sees the operating model will be of the new leisure facilities on either side of the A102M.</p>

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			I would welcome an early opportunity to meet with the Council so that Charlton Athletic FC can play a full and active part in the development of these proposals and look forward to hearing from you.
16	Mr James Blakey		<p>Draft Peninsula West Masterplan SPD - Representations - 8 March 2012</p> <p>Thank you for making available the draft Peninsula West Masterplan SPD dated February 2012. We would welcome the opportunity to meet with officers from Royal Greenwich to discuss and understand the proposals in more detail. We would be grateful if you could acknowledge receipt of these representations and contact our office on 0161 615 6900 to arrange a convenient date and time to meet.</p>
17	Ms Judith Cooke	Planning Liaison Officer Environment Agency	<p>Thank you for consulting the Environment Agency on the draft Peninsula West Masterplan Supplementary Planning Document dated February 2012.</p> <p>The key issues and opportunities for the Environment Agency in this location are as follows:</p> <ul style="list-style-type: none"> § flood risk management and improvement and realignment of flood defences; § ecological enhancement of the riverside and building on existing good practice on Greenwich Peninsula; § sustainable drainage; § remediation of contaminated land; § improvement of walking/cycling links; § provision of green open space. <p>We support objective 3 of the masterplan to ‘realise the unique design and other opportunities offered by this Thames Side location.’ The masterplan area offers considerable opportunities for environmental enhancements and we would welcome reference to this within the objectives. In particular, treatment of the riverside edge to create riverside public amenity space, habitat creation and flood risk management.</p>

ID	Full Name	Organisation	Comments
			<p>We have set out our detailed comments and provided further sources of information in the following sections appended to this letter:</p> <p>Section 1 – Detailed comments</p> <p>Section 2 – Sources of information</p> <p>We hope our response is constructive and clear. Please contact me if you have any questions or if you would like a meeting to discuss our response or any other issues.</p> <p>Yours sincerely</p> <p>Miss Judith Cooke</p> <p>Planning Liaison Officer</p> <p>Direct dial 020 7091 4002</p> <p>Direct fax 020 7091 4090</p> <p>Direct e-mail judith.cooke@environment-agency.gov.uk</p> <div style="border: 1px solid black; padding: 10px; margin-top: 20px;"> <p>Section 1 – Detailed comments</p> </div> <p>Flood risk management and improvement and realignment of flood defences</p>

ID	Full Name	Organisation	Comments
			<p>The Masterplan should be informed by the Greenwich Strategic Flood Risk Assessment (SFRA) and Surface Water Management Plan. It should also be informed by the Thames Estuary 2100 (TE2100) study carried out by the Environment Agency in 2009 in order to inform decisions regarding the flood risk.</p> <p>We are currently developing a Riverside Strategy for the tidal Thames appraising the environmental constraints and opportunities for each policy unit. We recommend referencing Local Issues and Choices P111 of TE2100: Accretion of the river bed is occurring at Greenwich. This may provide opportunities to improve the ecological capacity and appearance of this frontage. For more detail please visit: http://www.environment-agency.gov.uk/static/documents/Leisure/TE2100_Chapter09-zone3_east_London.pdf</p> <p>TE2100 contains a programme of flood management measures for the Thames Estuary which includes:</p> <ul style="list-style-type: none"> • our vision for tidal flood risk management for London and the Thames Estuary which seeks to optimise sustainable solutions with multifunctional benefits; • an action plan and investment programme of strategic flood management options covering the short, medium and long term; • a clear explanation of how the Plan is adaptable to the uncertainty of a changing future environment – including the changing climate and varying socio-economic scenarios that may develop over the next 100 years. <p>We would welcome the opportunity to work with you to integrate best practice ideas for realising flood risk management solutions and ecological enhancements through new development.</p> <p>We believe that this SPD should build on the success of the river wall retreating and terracing that has been completed on the north and west of the Peninsula. This should include setting back of defences and the creation of inter-tidal habitat. There are some sections of river walls in the masterplan site in a poor condition which will require upgrading or replacement. Setting back built development to create wider public realm and Thames path would also improve operational access to the Tidal Defences. Future climate change adaptation needs to be considered. An example is Delta Wharf where the defences have been damaged and are being repaired. Setting back of the defences and an improved buffer zone should be possible</p> <p>We would like to work in partnership with your Authority, third party developers and riparian land owners to improve condition of flood defences when sites come forward for development. From Slipway road (west by south west of the O2) upstream the river walls are in poorer condition requiring upgrading or replacement. It would be advisable to add onto the Masterplan Maps (P22/23 and 83) polygons representing an improved river edge/enhance river edge.</p>

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			<p>Referring to the map on page 21 of the Masterplan, there is a great opportunity in section 3 to set the riverwall back. Section 1 presents an opportunity to get the visitors to the proposed entertainment venue engaged with the river. The defence could be integrated into the landscape. However, a constraint will be that site levels do drop down to the A102. Section 3 the principle of set back and creation of new foreshore has been established in the planning permission approved February 2011 for Enderby Wharf. We would like to see this objective go forward in any new masterplan for the site.</p> <p>The sequential approach should be applied to land uses within the masterplan, with lower vulnerability development in the higher flood risk areas. Risk mitigation measures may also be considered, including some possible ground raising to reduce residual flood risk.</p> <p>For the Sports/Leisure/Education Complex the SPD suggests on page 24 that 'the western edge of the complex could be quite low lying'. We would support opportunities for flood defence set back and realignment but we suggest that you consider the levels of the flood defences and adjacent land to determine whether this would be possible at this location.</p> <p>Ecological enhancement of the riverside</p> <p>This stretch of the river supports mudflats, a UK priority Biodiversity Action Plan (BAP) habitat, and is an important habitat for overwintering birds and fish. It is valuable for its high biomass content but is declining in London.</p> <p>The masterplan should encourage protection of this habitat, as well as suggesting opportunities to create new habitat, potentially as part of flood defence realignment. The masterplan should discourage proposals that encroach into the Thames for non-river dependent uses. Development in the river Thames would need to be subject to full ecological and hydrological assessments, and potentially requiring suitable mitigation and compensation measures based on those assessments.</p> <p>Development sites within the masterplan should consider the principles of the 'Estuary Edges' guidance document. The eastern side of the Peninsula is a good practice example of flood defence realignment and habitat creation, including sections of reedbed, saltmarsh and mudflat. We would like to see this approach built on and replicated across the rest of the Peninsula where there are opportunities to do so. The Environment Agency can provide case study material and further information if needed. For more detail see Estuary edges guidance at: http://www.environment-agency.gov.uk/cy/busnes/sectorau/100745.aspx</p> <p>Another good example of riverside treatment within the masterplan is the existing planning permission for Enderby Wharf. The</p>

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			<p>developer is proposing to realign the flood defences and Thames Path, by setting back the defences and integrating them into the landscaping for the site. This will create a wider riverside open space and wider Thames Path, as well as creating new intertidal mudflat habitat by removing sections of sloping concrete revetments.</p> <p>Another way of ecological enhancement would be to take opportunities to remove redundant structures in the river, for example disused jetties.</p> <p>Realignment of the flood defences, habitat creation and removal of obsolete structures are measures which are identified in the 'Thames River Basin Management Plan'. This section of the Thames needs to reach 'good ecological potential' by 2027, which is required by the Water Framework Directive.</p> <p>Regarding chapter 8 on Regional Policy, we suggest that you reflect London Plan Blue Ribbon Network policies by building on them to suit the masterplan site.</p> <p>Sustainable drainage</p> <p>It is important that SUDS are considered on a masterplanning scale if opportunities are not to be missed. For example new strategic surface water sewers to the Thames may be needed to drain the inland sites. The existing surface water drainage system installed for the Peninsula routes all the water that drains to the sewers through two pumping stations that pump all the rainwater to the Thames irrespective of the state of the tide. Opportunities should be sought to lay new sewers to discharge as much of the water to the River by gravity as possible to reduce the carbon impact of the built environment.</p> <p>Green roofs should be promoted for their biodiversity and thermal efficiency benefits and to reduce the volume of water that will be discharged to the combined sewers. There is an existing green roof masterplan for Greenwich Peninsula and we would encourage the SPD to build upon this by promoting green roofs for the rest of the masterplan area.</p> <p>Remediation of contaminated land</p> <p>For sustainable redevelopment to be achieved in this highly industrialised area there has to be a clear commitment from the Environment Agency, Royal Borough of Greenwich, landowners and developers alike to work together to address issues of historic</p>

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			<p>contamination.</p> <p>There is acknowledgement of the historic as well as current land uses within this Masterplan document, which is known to be extensive. A wide range of industrial and commercial land uses have occurred on Peninsula West and so an appropriate level of contamination assessment and (in many cases) remediation will be necessary. The Masterplan document must consider how remediation of contaminated land will be necessary given the previous industrial use of the land in this area. It is not clear whether, for example, there has been consideration of whether the locations earmarked for sensitive land uses such as housing are being located away from areas expected to be significantly contaminated or not. This issue will be of particular significance with respect to the proposal to locate student accommodation on the existing gas holder land. We would recommend that the document outlines how new development may seek to address this issue.</p> <p>We know from investigations carried out for the Greenwich Peninsula outline masterplan that made ground and sub-soils are significantly affected by industrial pollution. In some areas this has led to contamination of groundwater within the River Terrace Gravels aquifer beneath the Peninsula, and in some cases contamination of the deeper chalk aquifer. These areas were subjected to a detailed sequence of investigations, with remediation action taken and long-term environmental monitoring put in place to observe natural attenuation of any contamination that could not directly be remediated.</p> <p>It will be important to address similar expected levels of contamination found in this Masterplan area. Developers and/or landowners should be aware of their likely responsibilities with regard to dealing with these issues, and the overall investigation and remediation effort should be coordinated to compliment the existing measures taken on the adjoining Peninsula East and Millennium Village development areas.</p> <p>Contamination is also likely to affect drainage schemes by for example restricting the use of infiltration drainage where there is a risk of leaching contamination out of soils into underlying groundwater. Drainage schemes for new development in this area must be informed by contamination assessments in order to prevent pollution of groundwater by discharges of surface water through land affected by contamination.</p> <p>Improvement of walking/cycling links</p> <p>We support proposals to improve and extend Thames path, and we are pleased to see the visual images for the masterplan include green areas next to the river Thames.</p>

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			<p>We support the creation of new river transport.</p> <p>Provision of green open space</p> <p>Welcome proposals to use green space to help with attenuating noise and air pollution</p> <p>We support the masterplan's aspirations to create visual links along the riverfront. This could be strengthened by promoting generous provision of riverside open space for development sites adjacent to the river Thames.</p> <div> <p>Section 2 – Sources of information</p> </div> <p>We collect key evidence for information and influencing plans. This information covers a wide range of environmental issues and opportunities and can be used to influence the policies and implementation of local plans.</p> <div> <p>Thames Catchment Flood Management Plan & TE2100 Plan</p> <p>Provides an overview of the flood risk in the Thames catchment and sets out our preferred plan for sustainable flood risk management over the next 50 to 100 years.</p> <p>http://publications.environment-agency.gov.uk/pdf/GETH1209BQYL-e-e.pdf</p> <p>http://www.environment-agency.gov.uk/homeandleisure/floods/125045.aspx</p> </div>

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			<p>Thames River Basin Management Plan (December 2009)</p> <p>About the pressures facing the water environment in this river basin district, and the actions that will address them</p> <p>http://wfdconsultation.environment-agency.gov.uk/wfdcms/en/thames/Intro.aspx</p>
			<p>Sustainable construction</p> <p>http://www.environment-agency.gov.uk/business/sectors/136252.aspx</p>
			<p>Environment Agency State of Environment Report for Greenwich</p> <p>Highlights environmental facts and data for Greenwich (November 2011)</p> <p>http://www.environment-agency.gov.uk/static/documents/Research/Greenwich_2011.pdf</p>
			<p>Environment Agency Adapting to Climate Change strategy</p> <p>http://publications.environment-agency.gov.uk/pdf/GEHO0709BQBW-e-e.pdf</p>
			<p>Environment Agency – Creating a better place Strategy</p> <p>http://publications.environment-agency.gov.uk/pdf/GEHO1109BQXG-e-e.pdf</p>

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			<div></div> <p>Other useful strategies</p> <div> <p>Drain London Project</p> <p>Drain London will aim to manage and reduce surface water flood risk in London by improving knowledge of the surface water drainage system and identifying areas at greatest risk of flooding.</p> <p>http://www.london.gov.uk/drain-london</p> </div>
18	Spencer Drury	Councillor - Greenwich Council	<p>General comments</p> <p>We welcome the production of this draft masterplan in principle. It is clearly advantageous to include in the Royal Borough's planning framework a united vision for the redevelopment of key areas. The Peninsula as a whole, and the west side of it in particular, includes prime sites for regeneration, which it would be undesirable to see developed piecemeal.</p> <p>Whilst supporting the concept, however, we are concerned at the way in which these plans have been developed in haste, with the contracted consultants given a short space of time to produce their vision, and the consultation process being unsatisfactorily short. There is limited understanding amongst the wider public of the existence and status of these proposals, and it is not made sufficiently clear that they are high-level visions (almost a wish-list), rather than firm plans. This problem is compounded by the level of detail in some of the Peninsula West Masterplan, particularly in relation to the Multi-Purpose Complex.</p>

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			<p>Vision, objectives and development principles</p> <p>The overall vision for the area correctly identifies many of the relevant issues, and we agree that the site has huge potential, and that it would benefit by better connections to existing transport links. We question, however, whether basing the site around a sports/entertainment/education facility is a realistic aspiration, given the proximity of the O2 and other sports facilities in London. Much of the Masterplan seems predicated on this development, and no evidence of research into the economic case is presented.</p> <p>Improving transport links, particularly those that link maritime Greenwich to the peninsula, are rightly given prominence in the Objectives, and we also support the focus on high quality design. However, there is no mention of building a community in the development area, and the impression given is that housing and quality of life for residents is a secondary consideration to the site's other uses.</p> <p>In the sections dealing with transport, there are references made to proposed extension of the DLR and to other schemes, some of which are merely aspirations of the Council, which are not contained in TfL or the Government's plans, and which cannot be considered imminent or feasible expectations. Better links to existing transport connections are not fully explored.</p> <p>Specific issues</p> <p>In the 'Movement' section, it is suggested that 'an additional road link from Blackwall to Silvertown should ideally be below ground'. As both these locations are north of the river, the relevance of this to Greenwich seems unclear. It seems it may be a reference to a proposed link from the A102 Blackwall Tunnel approach to the proposed Silvertown Tunnel (thus crossing the Peninsula)– if so, this needs to be rewritten to make it clear.</p> <p>As stated above, disproportionate attention and detail is given to the multi-use facility which is envisaged for the site. Whilst such an entertainment venue may be desirable, we reiterate our concerns that its viability is not discussed. The circular shape would seem to limit its sporting use, and the aspiration for it to hold 40,000 people would mean it would have twice the capacity of the nearby O2. We question whether it is realistic for the Peninsula to support two entertainment venues of this size so close together.</p>

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			<p>Even assuming demand exists, there are clear problems with a noisy outdoor venue being so close to the proposed housing development, and to residential properties opposite. The added pressure on transport infrastructure it would create is acknowledged in the plan, but this major issue is not given as much consideration as it deserves.</p> <p>It is unclear from the plan whether the gas holder is intended to be retained. The drawings and plans suggest it should be, but in other parts of the document (e.g. p54) it assumes 'that the gasholder will be removed'. This should be clarified. We would strongly support its preservation as part of the site's industrial heritage, and endorse the comment on p.57 about preserving other elements of this heritage.</p> <p>To end on a positive note, we are pleased to see that the Masterplan prudently includes an Outdoor Event Alternative on Page 82 using the site as a location for an elite sports complex or University facility, both of these uses would have a similar effect on improving the Peninsula's overall facilities as well as providing employment opportunities.</p>
19	Mr Adrian Cross	National Grid Property Holdings	<p>Introduction</p> <p>We submit formal representations on behalf of National Grid Property Holdings (NGPH). The extent of the land within NGPH's ownership (red line plan attached) lies to the north of the gasholder and is implicated on in the draft SPD's plans. We appreciate that these initial plans currently lack clarity in terms of the exact land take anticipated in and around the area safeguarded for the proposed Silvertown Tunnel (and they will continue to do so until more detailed transportation, geotechnical and environmental work is undertaken by TfL later in the year). NGPH have submitted formal representations to TfL in this regard. NGPH also look forward to submitting representations in response to later rounds of consultation on the Peninsula West Masterplan SPD and would welcome meeting with RBG to assist in bringing forward much needed regeneration within the Masterplan area.</p> <p>Comments on Sections within the draft SPD</p> <p>Section I - Introduction: The Royal Borough of Greenwich's (RBG's) aspiration to "release a number of land use safeguardings for industrial land and wharves, to create a new and exciting mixed use area which includes leisure, education, employment and housing" is supported. This sets an appropriate tone from the outset of an SPD with the aim to facilitate much needed regeneration at the Peninsula.</p> <p>The requirement for transformational change at the Peninsula is particularly important given the longstanding recognition of its significant redevelopment potential, reflected in its identification as an Opportunity Area in the London Plan. However, despite Greenwich Peninsula West's identification as a key contributor to the London housing target and its pivotal role in the wider regeneration of the south bank of the Thames, development has stalled in recent years due to a number of environmental issues largely associated with HSE zoning.</p>

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			<p>This stalling of development is reflected in RBG Council's latest AMR (December 2011) which illustrates a significant backlog of housing in the Borough against London Plan 2008 targets (a shortfall of 3,837 dwellings 2006-2011) and a shortfall in the 5-year land supply (2012-2017) of 2,284 dwellings. There are significant consequences of not addressing this shortfall and providing enough homes to meet natural population growth (in accordance with national policy) in terms of macroeconomic instability, hindrance of labour market flexibility, reduced affordable housing and constraints on economic growth.</p> <p>The draft National Planning Policy Framework (NPPF), July 2011, indicates that Local Authorities should prioritise first housing and economic development requirements and then third on the list (at paragraph 23), the provision of transport infrastructure. One of the main tenets of the draft NPPF is to place significant weight towards economic growth and in particular housing growth as one of the Government's key objectives.</p> <p>Section 2- Vision: Obstacles to development are appropriately outlined in the "Vision" section of the document. Recognition of the "huge potential" the area represents to overcome these issues and the need to find a sustainable solution to the piecemeal landscape is supported.</p> <p>Section 3- Objectives: The 6 "Objectives" identified at page 10 of the draft SPD are generally supported in principle across the Masterplan area as they will lead to higher levels of housing and job growth to facilitate regeneration. However, the justification for specific land uses and their configuration within the Masterplan area is questioned.</p> <p>Section 4- Development Principles: The multi purpose sports / education / leisure facility is not objected to in principle as it has potential to act as a catalyst for development within the Masterplan area. The concept of this facility representing the Masterplan's "hub" with extending "branches of development" is generally supported. However, the reference to the hub linking only to the northern and southern boundaries of the Masterplan omits the clear requirement to also link to the adjacent eastern area (to include NGP's landholdings). This central parcel of land is key to linking Peninsula West to the wider Peninsula Masterplan (in particular North Greenwich Station to north west).</p> <p>The linear, north-south conceptual approach illustrated is therefore considered to undermine the Masterplan's objective to overcome barriers to pedestrian movement (primarily the A102). This is reflected in the subsequent "movement" section which states that "pedestrian access is very limited due to the A102. Future cross peninsula links will integrate Greenwich Peninsula West with the wider Masterplan." The concept diagram and supporting text should consequently strengthen the need for west-east links from the proposed "hub".</p> <p>The "Movement" subheading (page 18 of the consultation document) identifies public transport routes and refers to proposals for an additional road link from Blackwall to Silvertown (ideally underground). Although the theoretical long term benefit of a new enhanced river crossing in east London (to improve accessibility and the resilience of local transport networks) is acknowledged, the lack of feasibility work undertaken to date (to include transportation, engineering, geo-technical and environmental assessments)</p>

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			<p>coupled with a funding deficit questions whether the Tunnel proposals will realise the potential of the Peninsula, or in fact do the opposite, and cause further development uncertainty.</p> <p>Even if a sustainable design solution was to be developed, uncertainty over the Tunnel's delivery is well documented: Greenwich Council's "Second Local Implementation Plan for Transportation", June 2011 confirms that the scheme is not funded in the current TfL Business Plan (2011), and although a study to examine the need for additional river crossings is included as part of the Mayor's current Transport Strategy (2010) there is currently no funding or date for their implementation. Although, it is believed that the Mayor generally aspires to deliver the Tunnel, paragraph 6.41 of the adopted London Plan (July 2011) recognises that the Mayor is "investigating the possibility of additional road-based river crossings in East London." The Committee Report from TFL's Environment, Corporate and Planning Panel 23rd February 2012 states that "the preliminary cost estimate for the crossing is around £700m (including future inflation and optimism bias at business case stage, but excluding potential financing costs)." It confirms that "further work on transport modelling, engineering feasibility and environmental assessment is taking place" and adds "in parallel with technical work, the business case continues to be updated and funding options considered." It also identifies a broad timetable if funding and stakeholder commitment is forthcoming. This ambitiously anticipates a technical submission for the Silvertown Tunnel by mid 2015; with a decision by late 2016. Importantly, it is understood from TfL that they will be consulting with landowners and the wider public during September and October of this year, on the now commissioned transportation and engineering modelling work. NGPH will welcome commenting on these various assessments to understand firstly, the exact alignment of the route and implications of this on their landholdings, and in more general terms the methodology and outcomes of those studies in assessing development impact.</p> <p>With the level of current and anticipated future uncertainty on the delivery of the tunnel proposals, there are considered to be a number of other significant planning, economic and transportation issues that need addressing in the short to medium term in order to meet national and local policy aspirations; to include: Short-term congestion solutions for the A102 given the proximity to the Blackwall Tunnel entrance. Short to medium term solutions to resolve traffic impact on the surrounding road network, particularly in the context of the O2 and proposals for a further concert / stadium facility. Delivery of regeneration proposals within the Peninsula to include high density housing, a university facility and leisure facilities in and around the Tunnel's safeguarded area. Creating solutions to mitigate the impact on the public realm which aim to provide enhanced west-east pedestrian links and subsequent safety issues (particular in the context of planned new education facilities and new residential communities). Creating solutions to mitigate the impact of additional noise and air quality impact on the local population.</p> <p>Section 5 - Development Framework: As identified above, there are significant questions over the Tunnel proposal, particularly in terms of the Peninsula's conflicting objectives in relation to significant regeneration and public realm improvements (in accordance with Local, London Plan and Draft NPPF policies). There is also considerable uncertainty regarding deliverability due to a lack of</p>

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			<p>confirmed funding. In addition, such a proposal has to be considered in the context of an area where there is a pressing need to deliver significant levels of housing and supporting uses. Further delay to their delivery should be avoided.</p> <p>Land within the Peninsula should not be sterilised through a safeguarded land designation (as identified on page 23 of the draft SPD) to support a scheme which at present, is undeliverable. In terms of the draft SPD's Development Framework which examines parcels of land within the Masterplan, as mentioned above, the multi-purpose „hub“ facility is not objected to; however, there is no justification on the need for such a facility. Clarification is therefore required on the need and demand for a stadium facility and in particular a new university campus (with student accommodation). Is there for example, interest from the University of Greenwich to expand?</p> <p>Within the “University Campus” section, a new elite sports facility in addition to student housing is proposed. Again, without any evidence on the need for these proposals, it is difficult to comment on their appropriateness in planning, socio-economic and environmental impact terms.</p> <p>In the absence of a robust justification for the Silvertown Tunnel and new university campus, in addition to a significant shortfall of housing in RBG, this parcel of land provides the opportunity to comprehensively redevelop the land adjacent to the A102 and gasholder. It also provides the opportunity to holistically consider physical linkages to the wider Peninsula Masterplan to the east which is planned to incorporate tall residential buildings connected to North Greenwich Station (where upgrades are planned).</p> <p>It is therefore considered that NGPH's land offers an excellent and unique opportunity to create a residentially-led, high density, tall building landmark that is focal to the Peninsula both in terms of proposed land use and its central location. A certain level of density will need to be achieved in design and viability terms, particularly given the likely abnormal development costs associated with the site's remediation.</p> <p>On page 25 of Section 5 of the draft SPD, there is no justification for retaining the existing gasholder structure and proposing student accommodation within it. It is questionable whether this would be feasible economically and from a design point of view. Ideally, both the gasholder site and NGPH's land should be carefully designed together in a sustainable, phased manner to ensure the best design response to this central area and the wider Peninsula.</p> <p>Page 29 of the draft SPD recognises the development potential of this parcel of land and ways to alleviate the acoustic impact of the A102 through the implementation of a green berm. However, the text on page 29 should recognise the need to improve all boundaries around this parcel of land (not just the eastern boundary). This can be carefully delivered through the comprehensive masterplanning of this parcel.</p> <p>The aspiration of the draft SPD on page 38 to provide a “safe thoroughfare for the community across the Peninsula, connecting to a number of pedestrian bridges” is supported.</p> <p>The proposal for land north of the gasholder (NGP landholdings) as “a further sports facility within the designated Silvertown</p>

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			Crossing Safeguarded Zone” on page 42 is strongly objected to for the reasons identified throughout these representations.
20	Brett Harbutt	Greenwich Peninsula Regeneration Ltd Quintain Estates and Development Plc	<p>GPRL is a joint venture between Lend Lease (Europe) Limited and Quintain undertaking the regeneration and redevelopment of Greenwich Peninsula which includes around 10,000 new homes, 3.4 million sq ft of employment space, 360,000 sq ft of retail use, extensive community facilities and over 47 acres of new and improved parklands and open spaces. GPRL is working in partnership with the Homes and Communities Agency (HCA) who are the owners of the majority of the site.</p> <p>GPRL supports the overall vision and objectives contained within the Masterplan SPD which, if delivered, will significantly enhance the Peninsula. Below we provide detailed comments on the document that we would like to see addressed prior to the SPD being adopted.</p> <p>Status of the Masterplan SPD</p> <p>It is understood that the Masterplan SPD is to be a non-statutory planning document with the key principles embedded within the emerging Core Strategy. The Core Strategy is yet to gain significant weight and there may be a number of material changes to the document before it is finally adopted by the Council. Therefore, preparing the Masterplan SPD in advance of the Core Strategy could be viewed as premature. Furthermore, given the scale of the proposals contained within the SPD, we consider promotion of these may be better suited to an Area Action Plan rather than a more informal Supplementary Planning Document with limited weight. This route would be consistent with Policy EA3 of the Draft Core Strategy which indicates an AAP would be prepared for the area.</p> <p>Masterplan SPD Boundary</p> <p>We consider the Masterplan SPD should include a ‘diagrammatic’ boundary depicting the area covered by the document. It is our view that the boundary of the Masterplan SPD should not include land within the consented GPRL masterplan as outline planning permission already exists for this land which will guide its redevelopment.</p> <p>GPRL Masterplan</p> <p>How the GPRL Masterplan plots are shown within the Masterplan SPD should be consistent. Currently some plots are ‘greyed out’ whilst others are coloured and/or hatched. GPRL consider all GPRL masterplan plots should be greyed out including those that fall within ‘Area 3’ as shown on Page 21 of the SPD. Constructed buildings within the GPRL Masterplan should be shown greyed out and hatched. Further detailed matters GPRL require to be corrected / clarified are:</p> <ul style="list-style-type: none"> • The proposed transit route should be shown running north up Tunnel Avenue and turning east

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			<p>down Ordnance Crescent to access North Greenwich Station. This route has been secured through the GPRL masterplan consent.</p> <ul style="list-style-type: none"> • The use of the Gateway site for education facilities and the CHP energy centre. Whilst GPRL is in advanced discussions with the Council about the use of part of the Gateway site for the district-wide CHP energy centre, the remainder of the site is proposed for B1c light industrial use and we would like to understand the Council's position on the loss of this employment use. • The introduction of a large area of public open space to the north of Victoria Deep Water Terminal and how this may be achieved within the constraints of the safe guarded wharf and GPRL's masterplan. • The large public open space arrow shown travelling north up Tunnel Avenue and through several development plots within the GPRL masterplan. This should be amended. • The omission of the 'Cable Car Masterplan' within the 3D model and plans of the Peninsula. • The proposed route of the DLR extension and how this could be delivered in close proximity to the GPRL residential plots of M0309 and M0308. <p>Health and Safety Executive (HSE) Consultation Zones</p> <p>A considerable area of the Masterplan SPD is currently affected by HSE consultation zones associated with the Greenwich gasholder and the Brenntag facility. The Greenwich gasholder HSE consultation zone also extends into the GPRL Masterplan.</p> <p>Discussions have been carried out with the operators of the Gasholder to enquire about the possibility and cost of decommissioning the facility. Whilst these discussions progressed well, they were not concluded. GPRL would be very keen to reopen these discussions with the Council and the HCA in order to understand the future arrangements for the gasholder.</p> <p>Outdoor Event Arena</p> <p>As recognised by the SPD, the introduction of a large (40,000 capacity) outdoor arena within the masterplan presents a number of significant challenges. In addition to the HSE consultation zones, matters such as accessibility, viability/long term use and noise/amenity impact on residential properties need to be properly considered. As the arena is a key element of the Masterplan SPD, how these issues will be addressed should be discussed in detail within in the document.</p> <p>This is particularly the case in relation to the proposed public transport infrastructure. Without the DLR extension this area of the Peninsula has a PTAL level of 2/3 (low/moderate) and poor pedestrian links from North Greenwich Interchange. The likelihood of the proposed DLR extension should therefore be fully explored before proposals for the arena are progressed in detail.</p>

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			<p>The Outdoor Event Arena has a large footprint and constrains the ability to deliver the objective of connectivity between the northern part of the Peninsula and Maritime Greenwich which was a key principle of the East Greenwich Riverside Framework document issued by the London Borough of Greenwich dated January 2000 and which informed the masterplan for Greenwich Peninsula.</p> <p>Page 81 of the Peninsula West Masterplan SPD Draft includes a football pitch within the outdoor event arena. GPRL would like to understand if this implies the possible relocation of Charlton Athletic Football Club to the Peninsula? If this is the case, this would not be supported by GPRL as we do not consider this is the right location for a football stadium.</p> <p>Proposed Transit Route GPRL firmly supports the principle of the proposed transit route from the Peninsula to historic Greenwich and there are planning obligations and conditions within the GPRL masterplan to assist in the delivery of the scheme. However, the route through the GPRL masterplan is incorrectly drawn and should be shown running up Tunnel Avenue and along Ordnance Crescent to access North Greenwich Interchange. Furthermore, detailed work is required to be undertaken by the Council before the scheme can be promoted to demonstrate how the transit route can connect with historic Greenwich as there are currently a number of constraints that need to be overcome south of the Masterplan SPD area.</p> <p>Silvertown Tunnel Although the Silvertown Tunnel safeguarded zone is shown within the Masterplan SPD, the new junctions that will be required to access the tunnel have not been identified. Whilst TfL have not yet completed the detailed design work for these, they should be indicatively shown within the Masterplan SPD to demonstrate how they can be integrated. GPRL would favour a form of junction that allows connections for residents and guests to the Peninsula but avoids the problems of 'rat running' traffic through the Peninsula.</p> <p>Safeguarded Wharves GPRL supports the Council's aspiration to consolidate Victoria Deep Water Terminal (VDWT) and Tunnel Wharf. However, GPRL is concerned at the potential environmental impacts associated with combining both wharves on the VDWT site (as shown in Scenario 2) without significant highway improvements. Currently, all traffic exiting VDWT and all traffic accessing the site from north of the river uses Millennium Way and Tunnel Avenue, generating circa 500 HGV movements a day through the GPRL masterplan. Any additional traffic and the associated environmental impacts from a combined wharf would need to be properly assessed and mitigated before the proposals are progressed by the</p>

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			<p>Council and others.</p> <p>A102 / Blackwall Lane</p> <p>The A102 currently divides the Peninsula. The A102 exists as a strategic route but also feels like an “Urban Motorway” with heavy levels of congestion caused by the Northbound Blackwall Tunnel. In conjunction with the delivery of the Silvertown Tunnel crossing, GPRL therefore welcomes the objective to mitigate the environmental impact of the A102 and provide further pedestrian crossings over the road. How this is achieved will be crucial to the successful integration of the two masterplan areas. Directly related to this, the omission of the Blackwall Lane / A102 junction from the Masterplan SPD area is considered to be a missed opportunity that should be addressed. This junction will become the primary access point to both masterplans and it should therefore be included within the Masterplan SPD.</p> <p>DLR Extension</p> <p>The DLR extension through the Peninsula is firmly supported. However, we believe this may better serve the Peninsula and wider Greenwich Community if the alignment connected northwards to Blackwall to connect with Crossrail at North Wharf. GPRL would welcome further discussions with the Council about these aspirations and how they may be delivered.</p> <p>Charlton Masterplan SPD</p> <p>Charlton Station provides additional resilience to the public transport network on the Peninsula at times when the Jubilee Line and/or Blackwall Tunnel are closed. As part of the Charlton Masterplan SPD, the train station and bus interchange should be identified as a transport hub to be upgraded and improved to provide additional capacity as required.</p>
21	Mr Bill Ellson	Secretary Creekside Forum	<p>Dear Sirs,</p> <p>Thank you for the opportunity to comment on the proposed Greenwich Peninsular West Masterplan.</p> <p>The masterplan should:</p> <ol style="list-style-type: none"> 1. Place a greater emphasis on employment, in accordance with London Plan Targets. 2. Show proper regard to Safeguarded Wharves policy as set out in both the London Plan and the draft National Planning Policy Framework. 3. Be in accordance with the Borough's Core Strategy, which is yet to be finalised. 4. Show proper regard to the Mayor's Supplementary Planning Guidance on Industrial Capacity (Mar 2008)

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			<p>5. Show proper regard to the Mayor's Supplementary Planning Guidance on Land for Transport Functions (Mar 2007).</p> <p>6. Show proper regard to the Mayor's draft Supplementary Planning Guidance on Land for Industry and Transport (Feb 2012) that is due to replace the Mar 07 & Mar 08 SPGs.</p> <p>7. Take into account the proximity of the Valley (football ground) and the O2 arena before proposing a large stadium.</p> <p>8. Show boundaries and areas clearly and definitively using proper Ordnance Survey data.</p> <p>9. Be produced in an easy to use and print format (A4 portrait) with a reduction in the number of pages and the excessive electronic file size.</p> <p>10. Look like a planning document and be stripped of unnecessary, vague and ambiguous 'illustrative' material.</p> <p>11. Avoid the use of undefined terminology such as 'Smart Wharf'.</p> <p>In that Masterplan currently fails in these respects it is UNSOUND.</p> <p>We are also in complete agreement with the comments made on behalf of the Port of London Authority by Ms Lucy Owen in her letter of 16 Feb. We are in broad agreement with the comments made by Miss Judith Cooke on behalf of the Environment Agency.</p>
22	Simon Powell	Head of Area, South London Homes and Communities Agency	<p>Overall the HCA supports the overall vision contained within the Masterplan, which together with the HCA's/Greenwich Peninsula Regeneration Limited's approved masterplan for the Greenwich Peninsula Development (eastern side of the Peninsula), will provide a comprehensive regeneration of this area of London.</p> <p>We have the following specific comments:</p> <p>Masterplan Boundary</p> <p>The Masterplan currently includes land within the consented HCA/GPRL masterplan and as this has already received planning consent we believe that this shouldn't form part of the proposed SPD Masterplan.</p> <p>Health and Safety Executive (HSE) Consultation Zones</p> <p>A considerable area of the Masterplan SPD is currently affected by HSE consultation zones. The HCA has previously commissioned a</p>

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			<p>feasibility study into the decommissioning of the Gasholder and will gladly share the findings of the study with the Royal Borough of Greenwich so that we can jointly find a way to remove this significant constraint to development.</p> <p>Outdoor Event Arena</p> <p>As noted in the draft SPD the proposed outdoor arena presents a number of significant challenges not least accessibility, traffic congestion, noise and overall impact on the surrounding residential occupiers. Measures to address these challenges should be detailed in the SPD.</p> <p>Transport Infrastructure</p> <p>The provision of improvements to the local transport infrastructure proposed in the document are welcomed particularly the transit route to historic Greenwich and a DLR extension. The HCA would welcome detailed discussion on how they can best be achieved for the benefit of the whole Peninsula.</p>
23	Mr Stewart Christie		<p>This period of consultation should be better publicised and run for a longer period of time.</p> <p>I hope that future detailed proposals are allowed far greater scrutiny.</p>
24	Mr Dick Allard	Westcombe Park Society	<p>The following are the comments of the Westcombe Society on the Master Plans for the Royal Borough of Greenwich. Our comments relate mainly to Charlton Riverside, Peninsula West and Woolwich but the more general points also apply to Eltham.</p> <p>Transport</p> <p>The Master Plans concentrate on creating an environment which is visually attractive and conducive to community development, and on the economic and social contribution of various elements to local development. These are clearly crucial issues. However, despite some welcome discussion of the need to promote sustainable forms of transport, there is no discussion of the impact that the proposals will have on the transport system and the harmful impact that high traffic levels have on pollution, noise and thus on quality of life. Currently there is a high level of congestion on both our roads and public transport so it is hard to see how the Master Plan proposals in their current form can have anything but a negative impact on an already congested transport infrastructure. The document gives inadequate consideration to transport infrastructure beyond making some suggestions about possible extensions to the DLR and river transport as well as the cable crossing. In terms of public transport, we regard it as essential (even as part of the Vision) to indicate any part of the proposed development which (to avoid unacceptable levels of crowding on existing facilities) would be dependent on the DLR extension, or on other upgrades.</p>

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			<p>Greenwich Peninsula is a very narrow neck of land surrounded on three sides by water with limited access routes. Charlton Riverside is adjacent to the peninsular and also suffers from significant congestion. It is therefore hard to take many of the proposals seriously, especially the proposal to create a 40,000 seat outdoor sports and leisure facility. The plan admits that there is very little scope for further parking and yet public transport fails to cope adequately with events at the O2 and the roads become congested not only on the peninsula itself but also in the approaches. There is no consideration of the effects of the proposed development on the areas adjacent to the peninsula.</p> <p>To achieve high quality developments, any proposals within the Master Plan, residential, industrial or leisure should be subject to the over-riding constraint that it is consistent with an overall reduction of road traffic within the Borough, and that any increase in demand for public transport is made contingent on increased provision. In respect of road use, this means that any anticipated increase in traffic from new developments (for people or goods) has to be small enough to be fully compensated by reductions in demand from existing developments. Additional road capacity, such as the proposed Silvertown Tunnel, will not help, as they will simply induce corresponding additional traffic unless accompanied by other measures to restrain traffic.</p>
25	Mr Philip Binns	Greenwich Conservation Group	<p>Support the aims and objectives put forward in the draft SPD but seriously question the viability, and for that matter the feasibility, of introducing an open air Sports/Leisure/Education Complex as a hub from which developments in the wider Peninsula area will benefit. Unless there is an end user already in place for, and committed to, such a facility, it is difficult to see how this well-intentioned element of the plan will prosper. We are far from convinced that the impact on the existing road structure of introducing a facility with the potential for accommodating up to 40,000 has been properly evaluated. Another of the objectives - that of using development in the plan to link historic Greenwich with the masterplanned zone of the Peninsula around the O2 - is laudable but can only be successful if pedestrian links and transport links are improved. One way in which the link could be improved would be by resurrecting the Greenwich Waterfront Transport System (GWT). However, the practicalities of finding a route which does not damage the existing built fabric the closer one approaches East Greenwich and the town centre is fraught with difficulty and references to a successor of the GWT are not helpful. In terms of improving pedestrian links between the north of the Peninsula and historic Greenwich, a key objective should be that the existing Thames Path is upgraded with sympathetic landscape treatments and that arrangements should be made with landowners, especially those operating on an industrial scale, for incorporating the path to the benefit of pedestrians (and cyclists) without adversely impacting on their operations - here we have in mind the safeguarded Victoria Deep Water Terminal and the adjacent Tunnel Glucose Wharf. We consider that the boundary of the study area should be reviewed to omit the riverside section north of the Victoria Deep Water Terminal. Outline planning permission has already been granted for a mainly residential use in this area and reserved matters approvals are in place for the Hotel and Ballroom [and serviced apartments] building alongside the O2, as well as for the first of the residential plots to come forward the Meridian Gardens quarter to the south - Plot NO602. We wholeheartedly support the proposal that the southern extension to Eltham and Falconwood of the DLR should pass through the study area but we suggest that the stop indicated in the plans is far too remote from the existing</p>

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			<p>bus/tube interchange at North Greenwich station - a shuttle bus will be required if all three modes of public travel are to be truly integrated. We note with interest [page 80] the possibility that, once the gas holder is decommissioned, an alternative use could be found for this historic structure. A reference is made to Kings Cross (Argent's development) where a precedent has already been set. Although the gas holder site is admittedly outside the study area it is regrettable that there is no image of the Kings Cross proposal in the document. In terms of other areas outside the study area, it would be helpful to know whether the planning consent for a secondary school in this area is ever likely to be reactivated, since this could influence the range of secondary level educational facilities proposed in the separate Charlton Riverside study. Regarding primary school provision, we consider that the SPD should give guidance on a further such facility on the Greenwich Peninsula. The existing Millennium School in John Harrison Way will surely, in time, be incapable of satisfying demand generated by the 2,250 homes in the Greenwich Millennium Village, the 10,000 homes on the Greenwich Peninsula and the new homes proposed for this study area for which, regrettably, not even a ball park figure is given. We have seen the comments of the Greenwich Society in this respect and if their assessment of a figure of 15,000 new homes on the Greenwich Peninsula overall is correct, the need to address primary level educational facilities on the Peninsula is even more pressing, irrespective of the fact that the need for a primary school is identified in the Charlton Riverside study. We welcome and support the provision of generous areas of green space but would ask that consideration be given to assessing whether, with a recognised area of open space deficiency close by in the nearby East Greenwich area, even more publicly accessible landscaped areas might not be provided. In overall terms, and taking account of the proposals not just for the study area but for the Greenwich Peninsula as a whole, we raise a major concern as to the ability of public services providers to cope with the additional burden that will be placed on already outdated systems - such as sewers and water supplies.</p>
26	Chris Smith	Greenwich Borough Liberal Democrats	<p>Redevelopment of this area following big changes in industrial use over the years, makes sense. However as the report mentions the challenges in this part of the Peninsula are significant. The shape of the land, hemmed in by the A102, makes things difficult and would necessitate changes to the Blackwall tunnel approach or some very serious screening for residential areas. The lower amount of residential use in this area does make sense in this regard.</p> <p>While space for the University would be welcome is there a need for another large stadium in this part of London? We would like to see more evidence of this and secondly, were this stadium to be built, it is unlikely that the existing transport infrastructure could cope.</p>
27	Greenwich Wharf Ltd	Greenwich Wharf Ltd	<p>On behalf of Greenwich Wharf Ltd, the owners of land at Lovell's, Granite, Piper's and Badcock's Wharves, we submit the following representations to the above draft policy document. The site is referred to below as Greenwich Wharf for simplicity.</p> <p>It is considered that this is an opportune time for the preparation of an SPD for Peninsula West in light of the consents in place for</p>

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			<p>Granite Wharf which forms a natural progression of redevelopment into the wider peninsula. Development stopped on Greenwich Wharf at the beginning of the recession and the next phase of development at the site has recently commenced.</p> <p>The vision and approach as outlined within the draft SPD for a new mixed use area which includes leisure, education, employment and housing is supported in principle.</p> <p>Section 4 Development Principles</p> <p>The approach of providing a new multi purpose sports/education and leisure facility is supported which could act as a catalyst for redevelopment of the wider area as is the introduction of a wide range of uses particularly residential uses which along with the multi-purpose sports and leisure facility will be the key regenerative driver for the SPD area.</p> <p>Section 5 Development Framework</p> <p>Large Riverfront Development are proposed along the River which would continue the presently proposed fabric at Enderby's and Lovell's Wharves. It should be reflected within the document that only a small part of Granite Wharf has been built and has yet to be started. These sites should be kept under review as part of the preparation of the Masterplan so that these sites when developed out are reflective of the changing circumstances of the wider peninsula in terms of proposed uses and emerging urban design principles, particularly relating to increased density and heights.</p> <p>It is noted that large residential led riverfront development is supported and reference is made at page 26 that these should continue the fabric of Greenwich and Enderby Wharves. In light of the continued difficulty in building out the Greenwich Wharf scheme as a result of the current</p> <p>economic conditions, reference should be made to the need to bring support to the later phases of the development of Greenwich Wharf which may include changes to the scheme to see this development delivered.</p> <p>In terms of the large riverfront developments it is noted that the draft SPD makes reference to the provision of flexible space for restaurants, offices and workshops. Further consideration needs to be given to how and when any employment floorspace is provided on site and the demand for these uses in order to avoid large areas of commercial floorspace being developed and</p>

ID	Full Name	Organisation	Comments
			<p>remaining unoccupied.</p> <p>It is also considered that the suggested 'large U shaped' multi use blocks are too prescriptive and that other appropriately designed Blocks which are reflective of the individual sites would be a more appropriate urban design approach from the outset.</p> <p>It is agreed that riverside development should address the riverside walk by providing appropriate ground level animation and supervision which is the case with the Granite Wharf development. It is agreed that ground floor uses should be designed with flexibility in mind and that in cases public and commercial uses may not be appropriate which would be better placed for residential accommodation.</p> <p>General Comments</p> <p>Although the illustrative Masterplan images throughout the document provide the vision for development of the area it is considered that there is an opportunity for the SPD to review proposed heights within the SPD area which take into account, built, consented, proposed and the wider vision for the area. This is particularly the case with the tall buildings which are proposed at the waterfront. The draft Core Strategy at Policy DH2 'Tall Buildings' identifies Greenwich Peninsula as being appropriate for tall building along the River. The draft SPD should reflect this within the Peninsula whilst accepting this should be determined as part of a design led approach.</p> <p>We request a response to these representations and that we are kept informed of progress with the preparation of the SPD. Please direct all future correspondence to either Rory McManus or Sam Hine at the above office.</p>
28	Cathedral Group	Cathedral Group	<p>On behalf of our client, Cathedral Group plc, this letter provides a formal response to the public consultation on the draft Greenwich Peninsula West Masterplan SPD, which closes on 9 March 2012. Informing these representations, we have reviewed the draft masterplan and attended the exhibition and presentation given by Lifschutz Davidson Sandilands and the Royal Borough of Greenwich's Spatial Strategy team.</p> <p>Our client has recently acquired a long leasehold interest in the old Tate and Lyle factory site and therefore has a significant interest in the content and delivery of this masterplan. The company looks forward to continuing to work closely with the Royal Borough of Greenwich in ensuring that the area is successfully regenerated.</p>

ID	Full Name	Organisation	Comments
			<p>In the light of this, we welcome:</p> <ul style="list-style-type: none"> a the principle of a regeneration masterplan for the west of Greenwich peninsula b the overall vision which seeks to turn the peninsula into hub with leisure-oriented mixed use activity c the vision to remove the safeguarded wharves and HSE constraints. <p>It is important that the Royal Borough of Greenwich does everything it can to put in place a strategy which will energise the peninsula and for its London- and international-wide profile to be broader than merely the O2 arena and cruise terminal and will need to work closely with suitable developers to achieve delivery.</p> <p>The aim of these representations is to provide guidance on where the masterplan can and should be strengthened to ensure that the implementation of the proposals are both deliverable and have support from stakeholders to enable this vision.</p> <p>To this end we provide comments on a number of sections of the draft masterplan which should be incorporated into the final version.</p> <hr/> <p style="text-align: right;">Vision</p> <p>Section 02 of the Masterplan is entitled 'Vision'. However, across the two pages (8 & 9), there is no clear vision presented. A vision for the masterplan must be founded in the principles of delivery, recognising that this is the very first stage in a long term process and no firm proposals can be identified at this time.</p> <p>Objectives</p> <p>The six proposed objectives are helpful in terms of setting out the types of uses that might be appropriate in this location. In particular:</p> <p><i>Residential Development</i></p>

ID	Full Name	Organisation	Comments
			<p>We note that there is no reference to the residential development which is approved at Enderby Wharf and which is proposed in the Development Framework graphic. Residential development will be critical to ensuring that this area is not only an area that people travel into and out of on one or two nights a week. Rather, the residential development must be integral to the wider proposals to ensure that the area is lively, active and creates a community.</p> <p><i>Flexibility</i></p> <p>The objectives provide little real flexibility to the uses envisaged for masterplan area. At this stage, where the Borough recognises that there has been no thorough examination into how the masterplan will be delivered or by whom, the objectives as they currently are listed are too rigid. Flexibility must be written into the objectives.</p> <p>Development Framework</p> <p>It should be made explicit that the framework diagram and the accompanying text is illustrative only. There are numerous ways in which the (new) vision and (revised) objectives could come forward. It must be clear to the stakeholders and developers that this is only one way that this masterplan process could be delivered.</p> <p>CHP Energy Centre</p> <p>As one example, it should be made clear that the size and location of the CHP energy centre is an suggestion and not a requirement.</p> <p>Silvertown Safeguarded Zone</p> <p>It is unclear from the text or image how the Silvertown Link safeguarding zone relates to the masterplan proposal. As the framework is drawn, the safeguarded zone lies partly on the Enderby Wharf scheme and across some of the residential blocks. Taking the block development to be illustrative, there is no clarity within the masterplan on the timescales for this proposal. Further guidance is needed and how it might impact upon the masterplan.</p> <hr/> <p style="text-align: right;">— Delivery</p>

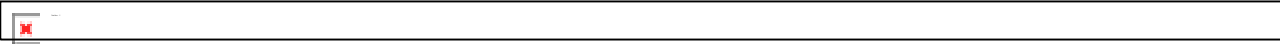
ID	Full Name	Organisation	Comments
			<p>These representations have focused on the need for the proposals within the masterplan to be deliverable. This cannot be stressed strongly enough. The practical and early regeneration of Peninsula West should be the key focus but that it may not necessarily come forward in exactly the way envisaged in this drafting exercise.</p> <p>For example, while there is the primary aspiration for the outdoor events arena and an alternative elite sports facility as an alternative, a wider vision and objectives must be presented to allow developers to bring forward creative ideas for the area should these two uses not be deliverable.</p> <p>The Borough's focus must now be on doing everything it can to implement the final masterplan and for the aspirations to be realised. This will involve engagement with landowners and developers to secure best practical opportunities for investment in new facilities.</p> <p>Assumptions</p> <p>Many assumptions are set out within the draft masterplan, such as the reliance on removing the HSE constraints and safeguarded wharves removal. As set out in later comments here, the Borough needs to now look to avoid assumptions and to ensure that they become a reality.</p> <p>Liaison with Stakeholders and Developers</p> <p>It is apparent from the content of the document that there has been little discussion with stakeholders to date and there are therefore many unanswered questions surrounding the viability of the proposed uses, availability of land to achieve the vision and the overall deliverability of the masterplan.</p> <p>Before the masterplan is adopted in its final form and beyond, the Royal Borough of Greenwich must actively engage with key stakeholders, developers and landowners to ensure that the masterplan is realised.</p> <p>Specifically:</p> <p>a We welcome the Borough's discussions with the Greater London Authority to date on the removal of the safeguarded wharves and this driving force needs to continue,</p>

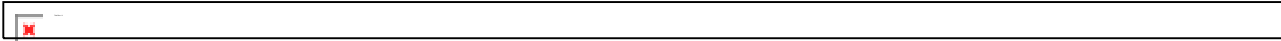
ID	Full Name	Organisation	Comments
			<p>b There needs to be active and enabling discussions with Brenntag and Transco to remove the constraints posed by these barriers to development as a result of HSE policies,</p> <p>c Discussions should be held with landowners to encourage the opportunities that could be presented to them by these regeneration proposals, and</p> <p>d The Borough should consistently and firmly support developers in their endeavours to bring forward these proposals.</p> <p>Transport Hub</p> <p>The whole Peninsula development relies on the ability for this part of London to be accessible by as many means as possible. The Jubilee line, the Clipper and road access is a start followed closely</p> <hr/> <p>by the proposals for the DLR extension and the planning permission for the cable car. The Borough should welcome increased accessibility to this part of London and allow it to be the transport hub that the area needs in order to enable the wide variety of needs the proposed uses will bring with it.</p> <p>Temporary Uses</p> <p>We welcome the section on temporary uses which could be implemented while the masterplan proposals are being drawn up.</p> <p>A raft of potential temporary uses will begin to widen the profile of the Peninsula and specifically this western area. We ask that the Borough welcomes the variety of proposals which are likely to come forward between now and when the masterplan is implemented.</p> <p>Other Matters</p> <p><i>Timescales</i></p>

ID	Full Name	Organisation	Comments
			<p>We are surprised that there is no indication of the timescale envisaged for this masterplan document. We understand from the presentation that the vision is for approximately 10-20 years from now i.e. to 2020 — 2030 but there is no detail set out within the document itself.</p> <p>It is important that a timescale is set out in order for the masterplan to be an practical and effective tool in implementing strategic plans rather than being an aspiration which is never delivered. Stakeholders and the Borough should adopt a positive approach to delivering the vision and this will be assisted by establishing time parameters.</p> <p>The timescales for delivery should start from today.</p> <p><i>Scale of Development</i></p> <p>It is correct that no scale or quantum of development is set out within the masterplan for any of the uses proposed. It is too early to be defining these parameters given that so little work has taken place to understand the feasibility of delivering the proposals.</p> <p><i>Moving Forward</i></p> <p>As set out at the start of this letter, our client is keen to work closely with the Royal Borough to deliver the aspirations set out within the Masterplan. We look forward to future discussions and welcome any questions that you may have about these representations or our client's development strategy.</p>
29	Mayor of London	Mayor of London Greater London Authority	<p>Thank you for your letter consulting the Mayor of London on the draft stage of Charlton Riverside; Peninsula West; Woolwich and Eltham Supplementary Planning Documents (SPD). The Mayor has afforded me delegated authority to make comments on his behalf on emerging SPIDs. The GLA welcomes the opportunity to consider the documents at this draft stage. These comments are officer —level only and do not preclude any further comment the Mayor may make on future consultation phases of the Council's Local Development Framework.</p> <p>The following comments relate to all of the documents:</p> <p>Overall transport</p>

ID	Full Name	Organisation	Comments
			<p>The masterplans are very high level and 'visionary'. Although TfL has no objection to boroughs producing such documents, they must have been developed with an appropriate consideration of current and potential transport provision, in line with London Plan policies 6.1 (strategic approach) and 6.3 (assessing the effects of development on transport capacity). These four masterplans appear not to have been assessed for current and future transport accessibility and capacity, as required by the London Plan, and assume transport schemes that are not being actively planned and do not appear in the London Plan, Mayor's Transport Strategy (MTS) or east London Sub Regional Transport Plan(SRTP). Adopting the masterplans as supplementary planning documents (SPD) is therefore considered to be premature.</p> <p>As SPD, the masterplans will carry more planning weight than is considered appropriate for the level of assessment undertaken to develop them. Publishing before consideration of strategic transport impacts, capacity and requirements via for example the preparation or updating of Opportunity Area Planning Frameworks (OAPFs), also seems inappropriate. In the case of Eltham town centre, there is no OAPF, so the masterplan itself should be subject to further strategic transport assessment. If the masterplans are to be adopted as SPD, they should be heavily caveated along the lines of:</p> <p>'This masterplan is subject to assessment of its strategic impact on transport and other infrastructure, achieved as appropriate through the OAPF/masterplan process. In addition, individual planning applications should, as per local and London Plan policy, be accompanied by a transport assessment'.</p> <p>The masterplans also raise the following specific concerns that could conflict with London Plan and MTS policies and could have implications for transport operations. These concerns are outlined in more detail below, along with highlighting factual errors. TfL is making a separate response to RBG in respect of its development and commercial land holdings.</p> <p>Overall Strategic Industrial Land release</p> <p>The Mayor's Draft Land For Industry and Transport 2012, which is currently out for consultation, sets out that there is no capacity for employment land release in Greenwich for the period 2011- 2031. However Greenwich is still in the limited transfer category</p>

ID	Full Name	Organisation	Comments
			<p>and as such there is some flexibility for release if this is backed up by robust local evidence.</p> <p>On a sub-regional basis within the South East London sub-region the actual quantum of industrial land release (54 ha) has been higher than the recommended 2010 Benchmark figure of 33 ha. The majority of this release has been in Greenwich and Southwark. While these rates of release are slightly higher than the comparative benchmark period figures, they are within the overall Benchmarks release timeframe release figures of 2006 to 2026 (which equates to 146 ha release in South East London).</p> <p>Overall energy</p> <p>Consideration should be given to the development of a district heating network. Comments on each of the documents are set out below:</p> <p>Greenwich Peninsula West</p> <p>The SPD sets out the following objectives for Greenwich Peninsula West:</p> <p><i>To transform the contribution of the area to the Royal Borough and the sub-region by focusing development and regeneration around a new multi-purpose sports/entertainment/education facility that links with, and complements the offer at the O2 Arena; to provide employment and education opportunities of excellence; to realise the unique design and other opportunities offered by this Thameside location; to improve transport and pedestrian links into and out of and through the area; to provide a major Thameside mixed use development that seamlessly links historic Greenwich with the masterplanned zone of Greenwich Peninsula adjacent to the O2; and to provide development of the highest design and sustainable quality.</i></p> <p>Principle</p> <p>Greenwich Peninsula West forms part of the Greenwich Opportunity Area as designated in the London Plan 2011, which sets out the following for the area:</p> <p><i>'The Peninsula plays two key strategic roles, as an internationally significant leisure attraction and as a major contributor to meeting London's need for additional housing. The main focus of commercial development is at the north of the peninsula around the O2 Centre and the Jubilee</i></p>

ID	Full Name	Organisation	Comments
			<p><i>Line station. Any release of industrial capacity should be managed in a sub-regional context and as part of the planning framework, recognising the roles of safeguarded wharves and the potential for a cruise liner terminal. River paths, parks and squares on the peninsula should contribute to a high quality public realm and become part of the wider East London Green Grid with potential to improve pedestrian and cycle linkages from the O2 to Greenwich town centre. Development and infrastructure provision should be co-ordinated with that in neighbouring Charlton Riverside.'</i></p> <p>An indicative employment capacity of 7,000 is set out together with a minimum of 13,500 new homes.</p> <p>Whilst it is accepted that leisure uses are acceptable in this area as it is part of the Strategic Cultural Area further information is needed, including details of deliverability and market testing for the education/entertainment/leisure facility. Concerns are raised about the suitability of the location of</p>  <p>such a facility in close proximity to residential development and a safeguarded wharf as well as impacts on the O2 itself. The principle of intensification of residential in the opportunity area is in line with London Plan policy however further discussion is needed around the details of the approach.</p> <p>Employment land release</p> <p>The GLA has raised non-conformity objections to the de-designation of Strategic Industrial Land in Greenwich Peninsula West in the Core Strategy consultation, particularly in relation to the potential to introduce uses that would be in conflict with the safeguarded wharves.</p> <p>The Greenwich Peninsula West SPD does not set out a quantum for SIL release however from the diagrams GLA officers have estimated that around 23 hectares of SIL is proposed to be released (81% of the Total SIL). This would mean that the SIL is effectively de-designated.</p> <p>Whilst there is flexibility for some SIL release further evidence is needed in order to assess if such a high level of release is acceptable. To inform further discussions a full employment land review should be prepared together with a schedule of the</p>

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			<p>employment uses already within the area and the levels of employment currently on the sites.</p> <p>Safeguarded wharves</p> <p>It is not clear which wharf option is proposed to be pursued. The Mayor would object to any proposal to remove the safeguarding of Tunnel Wharf. This is contrary to London Plan policy and contrary to the recent consultation on the review of Safeguarded Wharves.</p> <p>The Mayor does not agree with the following phrase in the vision statement as it does not recognise the wharves` strategic importance across London:</p> <p><i>The Victoria Deep Water Terminal (and the cleared Tunnel Refineries site to the south) blight development in the western part of the peninsula by occupying developable land and by affecting neighbouring plots with noise and heavy freight traffic.'</i></p> <p>The Victoria Deep Water Terminal and Tunnel Wharf are safeguarded wharves which perform (or have the potential to perform) an important strategic role in reducing the number of HGVs on London's roads. The Mayor recommends as part of the Safeguarded Wharves review to retain these and other wharves across London to pursue this policy objective in accordance with London Plan policy 7.26. Both sites benefit from relatively good access to the Blackwall Tunnel meaning that these wharves can readily serve markets on both the north and south side of the river.</p> <p>VDWT is in active use as an aggregates wharf and is therefore considered viable. Tunnel Wharf is currently vacant, and the Safeguarded Wharves review recommends to relocate it northwards to cluster with other marine related infrastructure (VDWT/Bay Wharf boatyard) and to ensure it remains within the Strategic Industrial Location and to accommodate the borough's aspirations for the area. Whilst clustering the two wharves may be appropriate, there is concern over the shrinking of both wharves onto a potentially even reduced VDWT site. In the light of the draft Safeguarded Wharves review this would be unacceptable and in conflict with London Plan policy 7.26. The "smart wharf" concept does not recognise the nature of wharf operations with all their impacts, their land transport needs and the benefits of co-location with processing, storage, etc. The challenge is for the Council and developers to ensure that land uses and development designs take</p> <div data-bbox="604 1157 1881 1197">  </div>

ID	Full Name	Organisation	Comments
			<p>robust industrial land uses on these wharves. The Mayor/GLA is willing to assist with this process.</p> <p>The proposed Multi Purpose Complex may be a suitable buffering land use adjacent to safeguarded wharves and a boatyard. However, the Mayor does not see that there is justification for this speculative use to replace the proven need for the safeguarded Tunnel Wharf.</p> <p>The Mayor is concerned about the lack of recognition of the Bay Wharf Boatyard facility which, subject to final works, should be operational in the near future. Large scale boatyards are important to the active use of the Thames by leisure and passenger craft and for the servicing and repair of river structures such as piers and jetties.</p> <p>Flood Risk</p> <p>The area is located adjacent to the tidal River Thames. However, the SPD does not appear to consider any long term implications of tidal flood risk nor of the recently produced Greenwich Surface Water Management Plan (SWMP). This is considered to be an omission in the light of London Plan policies 5.12/5.13 and reference should be made to the Environment Agency Thames Estuary 2100 project and to the SWMP.</p> <p>Transport</p> <p>Relocation of jobs to the White Hart Triangle, as proposed by the masterplan, will have potential transport as well as other implications that will need to be assessed.</p> <p>Potential for a ferry link to the Isle of Dogs and other destinations, and consequent requirement for passenger pier facilities, has not been addressed.</p> <p>The area generally has a low PTAL rating, reflecting the poor pedestrian linkages to the existing transport provision, yet the masterplan proposes significant trip generating development such as the 40,000 capacity stadium. Coordination with events at the O2 would also be critical to avoid overcrowding on public transport and congestion on the strategic road network and again this highlights the need for strategic transport modelling to be undertaken. Pedestrian and cycle links to Greenwich town centre will also need to be improved.</p>

ID	Full Name	Organisation	Comments
			<p>The masterplan specifically mentions, and shows an alignment for Greenwich Waterfront Transit (GWT) through the area. As per previous comments, it would be more appropriate to refer to 'improvements to bus services' and 'public transport corridor', both of which would, in principle, be supported by TfL. Issues with improving bus services will be potential routeings to the south of the masterplan area through the existing residential areas such as Christchurch Road and bus access to North Greenwich.</p> <p>The masterplan also specifically mentions, and shows an alignment for an extension to the Docklands Light Railway (DLR). This scheme is not identified in the London Plan, Sub-Regional Transport Plan (SRTP) or the Mayor's Transport Strategy (MTh), has not been assessed and as such it is very premature. It should therefore be deleted or shown as a 'potential public transport corridor' as in the Charlton Riverside masterplan. The masterplan must make clear that the strategic transport requirements of the area will need to be assessed, for example through an</p> <div data-bbox="602 564 1883 608" data-label="Image"> </div> <p>OAPF.</p> <p>The masterplan should respect the statutory safeguarding for the Silvertown river crossing and any more detailed proposals arising from the current consultation exercise on the tunnel option, which the Mayor aims to deliver by 2021. The requirements of a tunnel could significantly affect part of the masterplan area both within the safeguarded area and adjoining it but will have the benefit of reducing congestion on the A102, improving cross river journey times and providing the potential for new public transport links. The masterplan should acknowledge this work is on-going and will have a significant impact on the area.</p> <p>The A102, irrespective of the introduction of the Silvertown tunnel, will remain one of the key strategic roads in London and is part of the TLRN. It is extremely unlikely, given current and foreseeable traffic conditions, that pedestrian and cycle crossing facilities could be anything other than grade separated. The A206 to the south of the area is part of the SRN and is heavily trafficked through East Greenwich. Therefore it will be important to assess the impacts on both the A102 and A206 from development in the masterplan area.</p> <p>Also, as per the other masterplans, there is no clear statement on the vision for future sustainable access to the area, for example mode share aspirations consistent with those set out in the SRTP, making better use of the river for passenger transport and approach to parking, particularly important given the traffic congestion in the area on the SRN and TLRN. And again, a statement of funding sources and approach to CIL/sl 06 should be included in the delivery chapter.</p>

ID	Full Name	Organisation	Comments
			<p>Conclusion</p> <p>Whilst the GLA welcomes the decision to produce an AAP for the area the level of SIL proposed, the SMART wharf proposed and the loss of strategic wharf is not in general conformity with the London Plan. Further discussions are needed regarding these matters including the deliverability of the proposals before they can be considered acceptable. GLA officers would welcome an early discussion around the revised wording for the submission version of the Core Strategy which it is understood will be consulted on shortly.</p>
30	Metropolitan Police Authority	Metropolitan Police Authority	<p>I write on behalf of our client the Mayor's Office for Policing and Crime / Service (MPA/S) with regard to the above draft documents. They have been reviewed by CgMs on behalf of the MOPC/MPS, mindful of relevant national and local planning policy, and we therefore make the following observations and recommendations.</p> <p>The MOPC/MPS provide a vital community service to the Royal Borough of Greenwich and policing is recognised within the 2011 London Plan as being an integral part of social infrastructure. It is essential that the MOPC/MPS are well represented within the emerging LDF documents and these masterplans in order to ensure that the impact of new development upon policing can be mitigated.</p> <p>Context to Represent ti'ons</p> <p>The provision of effective policing is of crucial importance across London to ensure safe places to live are created as part of a sustainable community consistent with planning policy. I therefore refer briefly to relevant policies regarding the consultation masterplan documents below:</p> <p><i>National Policy</i></p> <p>The MPA are mindful that PPS1 states that Councils should prepare development plans which promote inclusive, healthy, safe and crime free communities Also Circular 05/05, paragraph B9, advises that developers may be expected to pay for or contribute to the cost of all, or that part of additional infrastructure provision, which would not have been necessary but for their development.</p> <hr/> <p>One of the objectives of the Draft National Planning Policy Framework (NPPF) July 2011 is to deliver the right community facilities,</p>

ID	Full Name	Organisation	Comments
			<p>schools, hospitals and services to meet local needs (para 124).</p> <p><i>London Plan Policies</i></p> <p>At strategic level, paragraph 1.40 of the London Plan (July 2011) states '<i>a growing and increasingly diverse population will create demand for more social infrastructure</i>' which, by definition, includes policing and other criminal justice or community safety facilities.</p> <p>This is reflected in Policy 3.16 Protection and Enhancement of Social Infrastructure which states that '<i>London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population</i>'. Paragraph 3.89 further notes that existing or new developments should, wherever possible, extend the use of facilities to serve the wider community, especially within regeneration and other major development schemes.</p> <p><i>Local Policy</i></p> <p>In addition, policies SCI and CI of Greenwich's Unitary Development Plan provide overall support for community services and facilities and Annex G of the Planning Obligations SPD (Adopted September 08) strongly support the provision of policing facilities in the borough.</p> <p>Given the support for policing within the national and regional planning policy context, it is therefore appropriate to ensure that the needs of the MOPC/MPS are reflected within the masterplan documents.</p> <p>General Representations</p> <p>In line with the overarching policy, it is key for the emerging masterplans to be supportive of policing and the provision of policing.</p> <p>Key to this is the provision of new policing facilities in line with development growth in the four masterplan areas. The MOPC/MPS are mindful that significant additional development is likely to come forward within the four masterplan areas through the introduction of new uses and the intensification of existing uses. The scale of development will increase demands on police resources and the MOPC/MPS request that this impact upon policing be regarded as a material consideration during application determination process and that this is reflected within the emerging masterplans. This would ensure the masterplans are in accordance with London</p>

ID	Full Name	Organisation	Comments
			<p>Plan Policies, in particular 3.16, and policies SC1 and CI of Greenwich's UDP. Additional wording in each masterplan supporting the provision of contributions towards policing would address the issue.</p> <p>Safety and security through good design is key in ensuring crime reduction. Secured by Design is an important initiative promoted by the Metropolitan Police to ensure a safe and secure environment is created within development proposals. Section 16 of PPS1 states that plan policies should deliver safe, healthy and attractive places to live. The inclusion of Secured by Design (and other similar measures) in the emerging masterplans is required.</p> <p>It light of both points above, it is requested that the MOPC/MPA are consulted in relation to all major applications in the masterplan areas.</p> <p>There are no particular policing facilities in this masterplan area although the scale of uplift of development will mean that a dedicated policing facility is likely to be required.</p>
31	Janet Goulton	Planning and Development Manager London City Airport Limited	<p>We would like to thank you for your email inviting London City Airport to comment on the Masterplans in place for Charlton Riverside, Woolwich Town Centre, Greenwich Peninsula West and Eltham Town Centre.</p> <p>Aerodrome safeguarding ensures the safety of aircraft and their occupants when in the vicinity of an aerodrome by controlling potentially contentious development and activity around it. London City Airport has a very specialised set of safeguarding surfaces which surround the airport, approved by the CAA, to ensure that building heights do not interfere with safe aircraft operations.</p> <p>Our support for development and regeneration in London is complimented by our approach to aerodrome safeguarding and consequently we would like to draw your attention to the Civil Aviation Authority's (CAA) documentation entitled <i>CAP 738 Safeguarding Aerodromes</i> and specifically <i>Appendix C London Tall Buildings Policy</i>. This document specifies the CAA's policy with regard to future buildings or other construction developments and the need to maintain the safe and efficient use of airspace over London.</p> <p>Whilst London City Airport in principle supports the proposals put forward and is keen to assist with the sustainable development of the area, it must be stressed that early consultation on the above issue in conjunction with the CAA's London Tall Buildings Policy is vital, and we actively encourage developers to bear this in mind throughout the planning stages.</p>
32	Carmelle	Planning	As you will be aware from previous representations, Thames Water are the statutory water and sewerage undertaker for the

ID	Full Name	Organisation	Comments
	Bell	Administrator Thames Water Plc	<p>Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2004 (as amended in May 2008). The provision of water and waste water infrastructure is essential to any development.</p> <p>We have the following comments on the consultation document:</p> <p>Waste Water/Sewerage and Water Infrastructure</p> <p>A key sustainability objective for the preparation of the new Local Development Framework should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 5.1 of PPS12 relates to other Development Plan Documents (DPDs) and states:</p> <p>“ LPA’s should consider the following criteria when determining which DPDs other than the core strategy they produce:.....In considering these questions, the following issues should be considered:</p> <p>- the requirements of utilities/infrastructure providers... ..”</p> <p>Policy 5.14 of The London Plan, July 2011 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and states:</p> <p><i>“Strategic</i></p> <p><i>A - The Mayor will work in partnership with the boroughs, appropriate agencies within London and adjoining local authorities to:</i></p> <p><i>a) ensure that London has adequate and appropriate wastewater infrastructure to meet the requirements placed upon it by population growth and climate change</i></p> <p><i>b) protect and improve water quality having regard to the Thames River Basin Management Plan</i></p> <p><i>Planning Decisions</i></p>

ID	Full Name	Organisation	Comments
			<p><i>B - Development proposals must ensure that adequate wastewater infrastructure capacity is available in tandem with development. Proposals that would benefit water quality, the delivery of the policies in this Plan and the Thames River Basin Management Plan should be supported while those with adverse impacts should be refused.</i></p> <p><i>C - Development proposals to upgrade London's sewage (including sludge) treatment capacity should be supported provided they utilize best available techniques and energy capture.</i></p> <p><i>LDF preparation</i></p> <p><i>E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel."</i></p> <p>Policy 5.15 of the London Plan relates to water use and supplies.</p> <p>It is unclear at this stage what the net increase in demand on our infrastructure will be as a result of the proposed development. However, the masterplans need to consider the net increase in waste water and water demand to serve the development and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.</p> <p>The list of issues covered in the masterplans should therefore make reference to the provision of sewerage and water infrastructure to service development. This is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.</p> <p>To accord with PPS12 and the London Plan text along the lines of the following section should be added to the framework:</p> <p><i>"Water Supply & Sewerage Infrastructure</i></p> <p><i>It is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances</i></p>

ID	Full Name	Organisation	Comments
			<p><i>this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.</i></p> <p><i>Further information for Developers on water/sewerage infrastructure can be found on Thames Water's website at: http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm</i></p> <p><i>Or contact can be made with Thames Water Developer Services</i></p> <p><i>By post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY;</i></p> <p><i>By telephone on: 0 845 850 2777;</i></p> <p><i>Or by email: developer.services@thameswater.co.uk ”</i></p> <p>Thames Water would also welcome the opportunity to work closer with the Local Authority to better understand the proposals as they evolve with time.</p> <p>Other Comments</p> <p>We would also like to draw your attention to the following issues with regards to the draft AAP:</p> <p>Tree Strategy and Planting –</p> <p>Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system and water supply infrastructure. In order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.</p>

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			<p>Access –</p> <p>Thames Water will require 24 hour vehicular access to any pedestrianised area to undertake emergency works. Access to the sewerage and water supply infrastructure must not be impeded by street furniture. This will enable Thames Water to operate the network with as little interruption to the service as is possible.</p> <p>9 Catering Establishments –</p> <p>Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in properties suffering blocked drains, sewage flooding and pollution to local watercourses.</p>
33	Ms Anna Townend	Greenwich Environment Forum	<p>SUMMARISED FROM HANDWRITTEN COMMENTS</p> <ol style="list-style-type: none"> 1. Long overdue. Since previous plans, there has been a lack of momentum and energy applied to the Peninsula's development 2. Lack of Peninsula wide small scale neighbourhood plan integrated with other local areas and their transport and heritage links 3. Shouldn't be forgotten that the industrial units still have the former grazing fields beneath them, with a distinct character. Don't think the masterplan does the past land uses any justice. Do not welcome the high development emphasis 4. Too broad brush to consider, without site specific green grid. Does not demonstrate sustainability <p>All 3 of the riverside masterplans, - Charlton Riverside, Greenwich Peninsula and Woolwich - lack a sustainable development approach even though this is a critical part of the planning system (Planning Policy Statement 1). We seek changes to the vision and</p>

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			<p>objectives of all 3 masterplans so that environmental, economic and social sustainability are brought to the centre of the documents.</p> <p>Environmental sustainability</p> <p>The vision and objectives should engage wholeheartedly with waterside issues, and draw attention to the value and importance of protected wharves and facilities.</p> <p>The objectives should include:</p> <ul style="list-style-type: none"> - To maximise the potential for freight transport by river, the aim is to safeguard all wharves providing access points for freight along the riverfront. - A presumption against tall buildings along the riverside, given their seriously negative effect. <p>The riverside is a very green area, so it is surprising that the vision and objectives do not give a high priority to the protection and enhancement of green space, including natural habitat.</p> <p>The proposed developments will increase traffic, and measures need to be taken to</p>

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			<p>protect air quality. These should be stated as objectives, including Low Emission Zones.</p> <p>We would like to understand the impact of development on carbon emissions and there should be a commitment to carbon accounting.</p> <p>Economic sustainability</p> <p>Some of the objectives - for example for Charlton Riverside - have a lot to say about employment, but the vision in each document is to relocate (at best) existing businesses and industries, to delete some of the strategic industrial locations and to use employment land for residential development. Even the proposed Charlton Garden City is characterised by its residential function, ignoring the important economic base that informs the Garden City model.</p> <p>In the London Plan, these areas are set a target for employment growth, ranging from 1,000 new jobs at Charlton Riverside to 7,000 new jobs at Greenwich Peninsula.</p> <p>Therefore, the vision for all 3 must include the aspiration to achieve employment growth, clearly stated as a net increase in jobs. To be sustainable the vision should also be</p>


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			<p>towards a low carbon economy.</p> <p>Several objectives will assist in the delivery of more jobs and a low carbon economy.</p> <p>There must be reference to higher education growth, high tech industries, investment in engineering and architecture. But this is the high end and there is also the need - and this is the part that is missing - to really address low wages and poor conditions in retail, catering, cleaning, personal care, repair and maintenance. There must be reference to the London Living Wage, to training opportunities, and to economic diversification .</p> <p>The objectives should be proposing a variety of green jobs, and there should be recognition of the voluntary sector contribution to the economy, including social enterprises. A vision of local sourcing, local procurement of services, support for local shops, businesses and street/covered markets would also help promote more sustainable local economic activity.</p> <p>Social sustainability</p> <p>The vision should be for a lifetime neighbourhood and a walkable community, where all</p>

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			<p>amenities and services are within walking distance. This includes local shops, play areas and community meeting spaces as well as local education and health provision. These are all very important social infrastructure which must be explicitly mentioned.</p> <p>The objectives should also make clear that affordable family housing is the highest priority</p> <p>We note the deficiencies in the consultation on these masterplans and we expect there will be a far more collaborative approach to the production of the Core Strategy submission document. We look forward to discussing with you how sustainable development can be at the heart of the Core Strategy.</p>
34		University of Greenwich	<p>On behalf of our client, the University of Greenwich (the university), we write in response to the Greenwich Peninsula West draft Masterplan SPD, hereafter referred to as the 'Masterplan', which is currently published for consultation until the 9 March 2012.</p> <p>Background</p> <p>The university and its predecessors, has over 100 years of history in the borough. The Woolwich Polytechnic was established in 1390 with a philanthropic gift, and has built close relationships with local people and employers, playing an important role in training a skilled workforce for London.</p> <p>Around twenty nine thousand students are based in partner colleges in the UK, and these include 5,000 international students from 100 countries. A further 8,000 students study for Greenwich qualifications overseas, whilst its researchers are working in 70</p>

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			<p>countries.</p> <p>As a custodian of 16 listed buildings, the university has an established track record of working within sensitive architectural settings. This demonstrable understanding of the importance of the historic context of Greenwich and its buildings has allowed the university to develop a brand that is recognised internationally, and has created a link with Greenwich.</p> <p>The university wishes to strengthen and consolidate this brand by bringing more of its activities into the town and its surrounding areas, and submitted and gained approval in October 2011 for a full planning application to develop a new academic facility (including a new School of Architecture and Construction) and a relocated library in Greenwich town centre. This will be to the benefit of both university and town.</p> <p>It is in this context that the university welcomes the publication of the Greenwich Peninsula West Masterplan, which will guide development and support the planning process at the above-mentioned location,</p> <p>Comments</p> <p>The university notes that the Masterplan suggests that part of the site could accommodate a new university faculty (Pages 24 and 25).</p> <p>The university are currently rationalising their portfolio, and although there is no current specific requirement at present for land and facilities on the Peninsula West site, this may change in the future and the area may become a natural site for future development of the university. Hence, the university welcomes the draft allocation in the Masterplan.</p> <p>On behalf of the university we request that we be kept informed of progress with this and future documents.</p> <p>We trust our comments are helpful and highlight that the university welcomes the opportunity to discuss any aspect of these representations with you. Please contact either Sally Fordham (0207 303 3599) or myself if you require any further information regarding these matters,</p>
35	Nick Raynsford	MP	<p>This Masterplan proposes even more radical changes to land uses than the Charlton Riverside Masterplan. It includes a proposal for a "Sports/Leisure/Education Complex", to the south of the Victoria Deep Water terminal, which is to remain as a protected "Smart Wharf", but with a less intensive use more compatible with the new residential quarters proposed for most of the Masterplan area.</p>

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			<p>The report envisages "A multi-use facility., to be centrally positioned within the Masterplan. A key role for it would be to provide outdoor entertainment linking with and complementing the offer at the O2 Arena. The complex could also be integrated with an elite sports facility or university."</p> <p>The only other employment uses (aside from a few "live-work" units amidst the residential sites) proposed to be kept is the inland half of the Alcatel site, in line with the permission recently granted for the cruise liner terminal and hotel. Education uses are proposed along the A102 just inland from this new arena, with residential to the north and south along the riverfront.</p> <p>Of the new residential sites, the northern one (Millennium Quays) already has planning permission, and the southern one (on Piper Wharf) would just be a northern extension of the "fabric" of the existing Lovells Wharf development just to the south of the cruise liner terminal, the first phase of which is already complete.</p> <p>The education uses could possibly reuse some structures from the Shooting Events on Woolwich Common, and the London Soccerdome on the other side of the Peninsula.</p> <p>Concerns</p> <p>1. The issue of the Gasholder is mentioned but not properly dealt with. The report rightly recognises that the land between the A102 and Millennium Way is "somewhat blighted by traffic noise and the gasholder", but does not recognise that even non-residential development cannot proceed until the gasholder is decommissioned. The report presumes its decommissioning, but contains no clear timescale for it. No justification is offered for retaining the gasholder, which would seriously inhibit development opportunities on adjacent sites.</p> <p>2. The Masterplan says that the area is "largely undeveloped and derelict", which is simply untrue. Amylum may have closed, but did so only very recently and Alcatel, the aggregates wharf and several others are surviving employment uses. The plan is not clear enough about the future of existing employers in the area. For example, the City Cross Business Park on Salutation Road is currently home to many thriving businesses including Didier's Patisserie (which employs 60 people and is just the sort of modern manufacturing business Greenwich should seek to retain). The Masterplan's support for</p>

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			<p>  "employment-led mixed use development" may be appropriate, as long as there is a clear strategy to ensure that businesses such as Didier's can remain and grow in the borough. </p> <p>3. The future employment prospects of the area seem very dependent on a new sports arena being viable as an "anchor" use at the heart of the Masterplan area. Given uncertainty over the future of the Olympic stadium, many other sports facilities in the Olympic Park whose future is uncertain, and the proximity to Charlton Athletic and other local sports clubs, the viability of an outdoor arena must be questioned. The Masterplan does not consider whether this new facility could pose a threat to the leisure uses on the Heart of East Greenwich site, which are due to be developed soon.</p> <p>4. The report says that initially the Arena's use would be for large outdoor concerts with a seating capacity of 40,000 (so providing an alternative venue for events which are often sold out at the O2), and that longer term there would be a sports focus. The report says it would be a horseshoe stadium like Baseball stadia in the US, allowing "picturesque views" to Canary Wharf — but baseball is not a sport with any following here, and without such a horseshoe configuration there would be little view of the river. Furthermore, unlike the O2 the proposed stadium is a good way from North Greenwich tube, and plans for a new bus terminal to transport people to and from North Greenwich do not convince.</p> <p>The Masterplan recognises that the transport linkages are fundamental to successful development, but fails to offer solutions on an appropriate scale. In this respect, the Masterplan displays a lack of imagination and ambition. No consideration, for example, is given to the possibility of extending the Emirates Airline Cable Car from North Greenwich to the proposed arena and Cruise Liner Terminal, or for possible further links from the Arena and Cruise Liner Terminal across the river to Canary Wharf and southwards to Greenwich town centre (the disused coal jetty by the Greenwich Power Station would offer an interesting terminal site for the Cable Car). This would overcome the problems which ultimately stopped the proposed Waterfront Transit link from North Greenwich to Greenwich town centre, problems which would equally affect the suggested successor scheme, referred to rather unconvincingly in the Masterplan.</p>
36	Ms Claire Craig	Planning Policy English Heritage - London Region	<p>1.1 As the Government's statutory adviser on the historic environment English Heritage is keen to ensure that the historic environment is fully taken into account at all stages and levels of the local planning process. English Heritage therefore welcomes the opportunity to comment on the four Supplementary Planning Documents (SPDs) currently out to consultation for the Royal Borough of Greenwich.</p>

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			<p>1.2 The Royal Borough of Greenwich contains a rich and varied historic environment, including a range of historic structures, townscapes and landscapes, as well as evidential heritage value in historic and prehistoric archaeology both from the Thames foreshore and inland.</p> <p>1.3 Planning Policy Statement (PPS) 5: Planning for the Historic Environment (2010), policy HE 3.1 requires that, in their Local Development Frameworks Local Authorities set out a “positive, proactive strategy for the conservation of the historic environment in their area”. English Heritage supports the production of these SPDs which we hope will help guide development and change to support conservation of the historic environment.</p> <p>1.4 Overall we are pleased to see that the historic environment is addressed through these SPDs with relevant historic context sections in the background information sections. However, we have suggested some amendments below which we believe will strengthen them in regard of their compliance with PPS5.</p> <p>2. Building heights and tall buildings</p> <p>2.1 A significant omission in all of the SPDs is clear guidance on building heights and tall buildings. English Heritage/CABE’s Guidance on Tall Buildings (2007) and the 2011 London Plan support a plan-led approach to tall buildings to ensure that they are located to maximise opportunities for good urban design and to avoid harm to heritage assets and their settings. While this approach has been established at a borough-wide level, where each of the SPD areas is identified as an area of tall buildings potential, there is an important role for the SPDs to refine this strategic designation through local masterplanning, and based on a more detailed understanding of the environmental characteristics of each area as required by PPS1. This is crucial for areas such as Woolwich where there is a concentration of heritage assets whose settings could be affected. A useful example to follow in this regard might be the London Borough of Wandsworth Site Allocations document.</p> <p>2.2 We suggest that explicit guidance is provided for each of the SPDs regarding building heights, and possible locations for tall buildings which takes into account any impacts on heritage assets, their settings, the townscape skyline and locally important views. This should be supported with clear urban design evidence, including an understanding of the local historic environment.</p> <p>2.3 In each document it would be useful for the policy review to acknowledge that each SPD</p>

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			<p>area is identified as a location of tall buildings potential, which explains the rationale for providing a building heights strategy.</p> <p>3. Archaeology</p> <p>3.1 Each of the SPDs cover areas designated as Areas of High Archaeological Potential yet archaeology has not been addressed as an issue in any of the documents. The banks of the Thames are particularly rich in archaeological findings due to the intensity of historic activity there, while Woolwich and Eltham Town Centres and the entire Peninsula have a long history of settlement and activity which could yield archaeological remains.</p> <p>3.2 Reflecting the Borough's unusually high archaeological potential we understand that it intends to adopt its draft document London Borough of Greenwich: Areas of High Archaeological Potential Appraisal, containing updated boundaries, character descriptions for each area, and short potential aspects for research. This is clearly a useful document for the purposes of strategic planning and decision making, and should be drawn on in each of the SPDs.</p> <p>3.3 We therefore recommend that Areas of High Archaeological Potential designations be identified in each of the SPDs, as set out in the Appraisal (together with a cross-reference to it), and that their sensitivity to development impacts be highlighted, drawing the character descriptions provided in the Appraisal. In addition, we would suggest that, where development proposals are concerned, the SPDs reinforce and encourage assessment of archaeological potential, reflecting the approach outlined in PPS5 and reinforced by the English Heritage London Archaeology Charter. If they fall within a designated area, applications should contain a Heritage Assessment to cover above and below-ground assets and sites outside of the Areas of High Archaeological Potential of 0.4ha or more in area should also be subject to the same process. If archaeology is a minor consideration then a statement in the Design and Access Statement should show that it has at least been considered.</p> <p>4. Consistency with PPS5 terminology</p> <p>4.1 In each document, to avoid ambiguity it is important to ensure consistency with PPS5 when formulating policies to addressing designated heritage assets, ie to seek to conserve their historic significance. For example, the Woolwich Town Centre SPD (page 100)</p>

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			<p>should address designated heritage assets, and cover all asset types, including archaeology.</p> <p>Borough-wide policy framework</p> <p>5.1 For clarity it would be useful to set out, in the introduction to each SPD, the Core Strategy policies which each SPD supplements.</p> <p>6. Design and heritage considerations</p> <p>6.1 We welcome policies to promote public realm enhancements and high quality design. In doing so it is important to explicitly promote contextually-sensitive design, for example, in terms of materials, heights, typologies, heights, street furniture. This is particularly important where there are higher concentrations of heritage assets, such as in Woolwich Town Centre. English Heritage has provided a range of Guidance documents to show how this can be achieved, notably English Heritage/CABE's Building in Context (2001) and our suite of documents entitled Understanding Place (2010).</p> <p>7. Peninsula West Masterplan SPD</p> <p>7.1 This masterplan does not currently identify the heritage assets which fall within or immediately outside the masterplan area which, along with their settings, may be impacted by development. Heritage assets in the area, these should be shown on a plan to demonstrate that a comprehensive and robust approach has been taken towards identifying potential historic environment impacts.</p>
37	Mr David Hammond	Planning and Advocacy Adviser Natural England, London Region	<p>Thank you for your correspondence dated 31 January 2012, requesting Natural England's views and comments on the above consultation documents. Your letter has been passed to me as a member of the Land Use Services Team for response.</p> <p>Natural England is the Government agency that works to conserve and enhance biodiversity and landscapes, promote access to the natural environment, and contribute to the way natural resources are managed so that they can be enjoyed now and by future generations.</p> <p>Natural England is supportive of initiatives to enhance and improve access to green spaces as well as provision of new green open space provision, especially in areas of deficiency for access to nature. Improvements to and realignment of the Thames Path National</p>

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			<p>Trail, where appropriate are also welcomed and supported.</p> <p>The Masterplan proposals seek to encourage and provide new residential and economic opportunities within the selected areas. As part of sustainable development the Council should also seek to provide sufficient leisure and amenity resources also, new parks and green spaces should be considered, along with improvements and enhancements to existing sites.</p> <p>Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. This should be made more explicit in the Town Centre Masterplans and policies included to ensure the borough's green infrastructure is designed to deliver multiple functions.</p> <p>The council should consider the role of the natural environment as part of a sustainable developmental approach, together with energy efficiencies. As discussed above, incorporating the natural environment into the built environment can significantly contribute to climate change adaptation including through flood storage, reducing rainwater runoff and ameliorating the urban heat island effect. We recommend that the role the natural environment can play in climate change adaptation is drawn out further in the Masterplans, and policies included reflecting this.</p> <p>The potential for new and additional residential provision within the selected Town Centres/Areas can lead to increased pressure on existing resources, including leisure and amenity spaces Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system:</p> <ul style="list-style-type: none"> • No person should live more than 300 metres from their nearest area of natural green-space; • There should be at least one accessible 20 hectare site within 2 kilometres; • There should be one accessible 100 hectares site within 5 kilometres; • There should be one accessible 500 hectares site within 10 kilometres. <p>This is recommended as a starting point for consideration by local authorities and</p>

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			<p>can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some urban areas/authorities than other, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their Borough.</p> <p>Green Grid and Blue Ribbon</p> <p>The use of the existing natural signature of a borough can be used to help deliver Council objectives. Natural signature refers to the underlying landscape of an area, which if drawn out, can make a direct and powerful contribution to 'sense of place' and local distinctiveness. An example of this can be seen in the Wandle Valley Regional Park which has a natural signature of water meadows echoing the meandering course of the river, backed by bands of wet woodlands.</p> <p>Natural England has recently produced the London Landscape Framework which gives further guidance on the 'natural signatures'. We recommend that you refer to this document and ensure that it is reflected in the appropriate section of the Masterplans. The London Landscape Framework can be found at:</p> <p>http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx</p> <p>The Council should also look at the fragmentation of open spaces and the linking of them back to paths and other sites. This would also be in line with the councils aspiration to promote and encourage pedestrian and cycling opportunities for the Town Centres.</p> <p>Below are general comments that may be of use for potential developments and developers in the areas, and are offered as advice.</p> <p>Local wildlife sites</p> <p>If proposal sites are on or adjacent to local wildlife site, e.g. Site of Nature Conservation Importance (SNCI) or Local Nature</p>

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			<p>Reserve (LNR) the county ecologist and/or local Wildlife Trust should be contacted.</p> <p>Protected species</p> <p>If representations from other parties highlight the possible presence, or the Council is aware of a protected or Biodiversity Action Plan (BAP) species on the site, the Council should request survey information from the applicant before determining the application. Paragraph 98 and 99 of ODPM Circular 06/2005 and Paragraph 16 of Planning Policy Statement 9 [1] provide information on BAP and protected species and their consideration in the planning system.</p> <p>We would draw the Council's attention to our protected species standing advice, which provides guidance on when protected species may be impacted by a proposal. The advice can be found at:</p> <p>http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/standingadvice/default.aspx</p> <p>Biodiversity enhancements</p> <p>Application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as those mentioned above. The Council should consider securing measures to enhance the biodiversity of sites from the applicant, if it is minded to grant permission for applications. This is in accordance with Paragraph 14 of PPS9. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.</p>
38	Mr Peter Luck		<p>I thought that, late as it is, I would put on record some of the comments I made at the public presentation of the masterplan plus a few I then withheld.</p> <p>I. As I understand the present state of play, the GLA has proposed moving the Safeguarded Wharf</p>

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			<p>designation from Tunnel Wharf to Primrose Wharf (which is to say from the southern part of the ex-Syral site to the northern). The masterplan document refers to combining this with the 'smart wharf' at VDWT but the masterplan also locates an open-air arena on the Primrose Wharf site. In other words, a safeguarded wharf will be lost. As attempts are being made to revive the use of the Thames for environmentally responsible transport and London-wide policy seems to support this, it would not be appropriate for LB Greenwich to thwart this intention.</p> <p>2. Not only will a safeguarded wharf be lost but existing industrial land will be both reduced and thoroughly re-ordered. This implies disruption to existing companies and risks the closure or emigration of at least some of them. If intending to nurture the employment base, this seems irresponsible.</p> <p>3. The concept of the 'smart wharf', it seems, requires all the functions of the wharf other than discharging or loading of a ship or lighters to be relocated to remote sites. The justification given at a previous presentation was that this would remove nuisance from residential areas. This argument seems less than persuasive. The materials discharged (at present sea aggregates with other uses a</p>

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			<p>future possibility) are required primarily for the London construction industry which, even in a time of recession, is hungry for aggregate; bringing it into London , moving it back out to the periphery and then in again, by truck, makes no sense.</p> <p>4. It is also a matter of concern that the range of employments on offer in the area would be reduced by the policies and spatial allocations referred to here. Specifically, the amount of work of a manual nature, skilled or unskilled, would diminish. This ignores two things: first, the continuing need for such work to be done and to contribute to the functioning of a metropolis from within it, and secondly the need to accommodate the wide variety of people within a metropolis not all of whom will readily accept non-manual work.</p> <p>5. On a different front, I note that the riverside path is given the role of ‘seamlessly linking Historic Greenwich’ (or Royal Greenwich) to the O2. These words are worrying as they suggest a further reduction in the variety and capacity for surprise in the riverside path as it is. A strict adherence to the water’s edge is quite unnecessary for a satisfactory Thames path and may indeed diminish it. I refer you to the brief description of this path in Ian Nairn’s ‘Nairn’s London’ (attached). What he described</p>

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			<p>in 1966 is now lost but his fierce defence of variety is still relevant.</p> <p>6. At the presentation I asked whether there were yet either a university or arena operator showing interest in the proposed sports/entertainment/education complex. Other than a tentative showing from AEG the answer was 'no'. This raises some doubt as to the intent behind such an unlikely proposal. Is it actually intended or a strategy for use in persuading GLA and PLA to renounce the safeguarded wharves. If so, that would seem irresponsible (see 1 and 2 above).</p> <p>7. Little is said about housing other than that it should be high quality. As low quality could hardly be acceptable in any circumstances this, too, raises doubts: does 'high quality' translate as 'up-market'?</p> <p>Although the market may well support such a policy, it is not the appropriate policy to meet London's housing needs.</p> <p>8. I am puzzled why, having a dramatically sited, historically important and rather beautiful gas holder, it has been thought appropriate to hide it behind other fairly tall buildings.</p> <p>It appears that the proposals where not unrealistic tend to support the onward march of the anodyne and, sadly, would both put the continued productive use of the river at risk and contribute to the polarisation of metropolitan society by displacing industry and industrial workers to unspecified locations, and that is not what responsible planning is about.</p>