Appendix 19: Statement of Representations; Draft Core Strategy with Development Management Policies Consultation Responses Report

Questions 1 & 2 - Spatial Portrait – 1) Does the spatial portrait accurately describe the key characteristics of the Borough? Or are there any other significant features of the Borough that we have missed? 2) Does the spatial portrait accurately describe the different places within the Borough?

	Consultee			Agent					
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Portrait (Refer to section 1.5) - Question 1: Does the spatial portrait accurately describe the key characteristics of the Borough? Or are there any other significant features of the Borough that we have missed?**	**Spatial Portrait - Question 2: Does the spatial portrait accurately describe the different places within the Borough?**	**Council Response**
DCS7	Sheila	Field					Paragraph 1.5.10. It would be ideal to include the percentage of housing which is detached or semi-detached. This information would be useful to residents in the South of the Borough.		Unfortunately this information is not currently available
DCS8	James	Williams	London - Abbey Wood Congregation of Jehovah Witnesses				Yes	Yes	Noted
ADCS9	Paul	Webbewood					For me the two most striking paragraphs in the doucment are 1.5.5 which states that Greenwich is one of the fastest growing Boroughs in the country and 1.6 which anticipates further increase of over 20% by 2027. Para 1.5.2 claims that Greenwich is one of the largest London Boroughs. A glance at the map below this paragraph clearly shows this not to be the case. Data from London Councils: http://www.londoncouncils.gov.uk/londonfacts/londonlocalgovernment/londonmapandlinks/default.htm suggest that at 5044 hectares Greenwich is the 12th largest Borough. This is not just nit-picking - it is important not to give the impression tha the Borough has more space for building than it actually has. Incidentally according to London Councils Greenwich has an area of only 4,726 hectares. I am doubtful about the oft repeated claim (para 1.5.19) that Greenwich has the longest river frontage of any London Borough. While Greenwich has a 14 kilometre frontage, Richmond credibly claims one of over 20 miles: www.richmond.gov.uk/borough_profile Para 1.5.23 might want to mention that some properties in the Borough lie in the flood plain of the River Quaggy. I think that Eltham Palace is a grade I listed building, not grade 2 (top of pages 21)		The reference to Greenwich being one of the largest Boroughs has been removed. Reference to the River Quaggy has been added. The river frontage is the longest single side frontage. Richmond's frontage is measured by looking at both the north and south banks. The details of Eltham Palace's listing have been amended.
DCS25		Waite					It is broadly accurate but the issues below need greater emphasis: 1.5.17) Very poor transport links in some areas 1.5.18 & 1.5.24) Poor air quality overall is a great concern 1.5.32) Charlton has an abysmal range of local retailers; and its heritage value is grossly underestimated.	Yes as regards the places we are familiar with. However, despite being long-term Greenwich borough residents there are areas we have never visited (either because of poor transport links or 'dodgy' reputation) so cannot comment overall.	Reference to poor transport links is made at 1.5.17. Reference to poor air quality has been added as has reference to Charlton's heritage assets. It is felt that Charlton has a suitable number of retail units. Planning has only limited control over the types of retailer that occupy a unit.

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DCS29		Mayor of London	Greater London Authority				It is stated that there are poor north-south links within the borough. However, no evidence has been provided to support this claim, and TfL considers that good north-south bus links are already provided within the borough. While TfL considers that the existing bus network caters for existing passenger demand, it would however be open to further discussion with the borough if it considers there are any particular missing links which need to be addressed. Where expansions are required to the bus network as a result of new development, then s106 contributions will be required to mitigate the impact of this. TfL would recommend changing the last sentence from As the only large vehicle crossing between Tower Bridge and Dartford Crossing, the Woolwich Ferry can cause congestion in the area to The Woolwich ferry is the only crossing capable of taking full height HGVs between Tower Bridge and the Dartford Crossing. This currently results in traffic congestion in Woolwich Town Centre		North-South rail links are poor and while bus routes exist, there is scope for improvement. TfL have provided evidence of poor north-south links within the challenges and opportunities document from the Sub-Regional Transport Plan. Wording of the last sentence has been amended as requested.
DCS32	Nicolas	Long					No	Yes	Noted
DCS33	Caroline	Evans					Section 1.5.41 states that Deptford Creekside contains a variety of small scale commercial and industrial uses in fact, this is no longer the case, and the ATA is concerned that developments will further sideline such activity. The same section also states that this area is benefiting from ongoing programmes of environmental improvement and housing estate refurbishment as responses elsewhere will make clear, the use of the word benefiting is interesting: many feel that any benefits are in danger of being outweighed by the pressures these developments are posing on an already stretched infrastructure.	Yes: so far as I know	Small scale' and 'benefitting' have been removed and the paragraph reworded

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DCS42			Greenwich Peninsula Regeneration Ltd	James	Wickham	Gerald Eve	We welcome the recognition at Section 1.5.34 that the Peninsula is the largest and most significant regeneration area in the Borough•. However we are seriously concerned that the policies set out in the Core Strategy underplay the role of the Peninsula and do not emphasise its potentially significant contribution to Londons world city role. They also fail to support its delivery. The Peninsula can only fully realise its strategic importance in the context of a policy environment that actively supports and encourages, rather than potentially impedes, development. The Draft Replacement London Plan has set a housing target for the Borough of at least 25,950 new homes between 2011 and 2021. Over 50% (14,000) of these homes will be delivered on the Peninsula, and circa 40% (10,010) of them have been granted planning permission in GPRLs masterplan for the regeneration of North Greenwich. Enabling delivery of development on the Peninsula is therefore absolutely essential to achieving the Core Strategys objectives. A Core Strategy that does not recognise the strategic importance of the Greenwich Peninsula and secure its delivery will be fundamentally flawed and ultimately unsound. The spatial portrait of the Peninsula should also recognise the synergy between the Peninsula and the significant regeneration at the Royal Docks. In particular, it should recognise the strong potential links to the Docks, such as the proposed cable car which has now received planning permission (subject to s.106), and the potential future Blackwall Silvertown crossing as a tunnel, for which land at the Peninsula remains safeguarded.		The spatial portrait section portrays the Borough as it is now. Within the spatial strategy section, the future role of the Peninsula in the Borough is made clear and its importance in delivering the Borough's housing targets. Reference is made to river crossings including the Silvertown link and the cable car.
DCS43	Barbara	Reid					Section 1.5.41 states that Deptford Creekside contains a variety of small scale commercial and industrial uses, this is not the case now and I am concerned that developments will further sideline such activity. The same section states that this area is benefiting from ongoing programmes of environmental improvement and housing estate refurbishment. Many local people feel that any benefits are in danger of being outweighed by the pressures these developments are posing on an already stretched infrastructure.	Yes	Small scale' and 'benefitting' have been removed and the paragraph reworded
DCS45	Peter	Rice					1.5.42 - 1.5.46) Eltham and the south of the borough is not covered to same depth as the northern part of the borough. Very well written and well presented.		Supported welcomed. It is accepted that the area of 'Eltham and south of the Borough' is larger than some of the areas in the north, but it is still felt that this is an appropriate division of the defining places of the Borough.
DCS46	Susan	Proudfoot					Describes them reasonably well.		Noted

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DCS56	Chris	Holland	Blackheath Park Conservation Group					On the Places of Greenwich Diagram page 17 and later text, we feel the inclusion of Blackheath within Greenwich Riverside• is perverse. The riverside can sensibly refer only to the lower ground. As a place (as distinct from a current development location) the Peninsula should be included in Greenwich. The higher ground should be separately recognized as Blackheath. Alternatively, the Peninsula and Greenwich Riverside should be merged and called Greenwich and Blackheath. Para 1.5.39 strikes us as a complete nonsense. Blackheath is not very similar in character to Greenwich• , cannot be summarized as being of close-packed terraced houses• and only some parts of it have fine views over the river•. The village, the heath and wider Blackheath appear to have collided here and been largely evaporated. How this is rectified depends on the resolution of the point in the previous paragraph. We would be happy to offer text if requested, or to comment on a proposed revision ahead of the next formal consultation.	The description has been amended to give a clearer description of Blackheath and 'Greenwich Riverside' has been renamed 'Greenwich and Blackheath.' It is still felt appropriate to keep the Peninsula separate given its very different character and relative separation at present from the Greenwich Town Centre.
DCS59	Judy	Smith	South Greenwich Forum					There is disappointment at the way Eltham and the south of the borough are dealt with in the Spatial Portrait, in the section on Greenwich 2027 and in the overall Spatial Strategy section. The description of the south of the borough gives the impression of greater affluence than is the case, taking into account the major 'Council' estates in the south. The description of Kidbrooke glosses over the need for regeneration within the redevelopment, and fails to mention that it is not likely to be fully completed much before 2027.	This section has been amended to make note of the housing estates within the Eltham area and the need for regeneration in Kidbrooke.
DCS69	Laurie	Baker	Eltham Society				It appears that Eltham and the south of the borough (1.5.42 to 1.5.46) rather glosses over the wide variations that occur and should have described the great diversity in this part of Greenwich. There is an error in 1.5.43: parts of Eltham Palace are grade I listed building, notably Great Hall and bridges across the moat.		It is accepted that the area of 'Eltham and south of the Borough' is larger than some of the areas in the north, but it is still felt that this is an appropriate division of the defining places of the Borough. The details of the listing of Eltham Palace have been updated.

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DCS77	Geoffrey	Belcher	Maritime Greenwich World Heritage Site				1.4.11 Key influences The unique characteristics of Greenwich is described as one of the 5 key factors influencing the Core Strategy. This is endorsed and it is hoped that this will be applied to policies emerging from the Core Strategy. Local plans should be about local places.	1.5.25 Cohesive and Healthy Communities A plan is shown which divides the Borough into The places of Greenwich although there is no explanation of how these places were defined .Maritime Greenwich is seen as part of Greenwich Riverside although in many respects it is also part of the Riverside area defined as Greenwich Peninsula. Historically there were strong links with Woolwich and Eltham. As a World Heritage Site with 10 million visitors annually Maritime Greenwich is part of a world-wide community. The photograph of Maritime Greenwich is unfortunate for it indicates a dominance by the towers of Canary Wharf.	It is noted that there are historic links between Greenwich Town Centre and the Peninsula, but for the purposes of defining the places as they are today it is felt that this divide is appropriate. These two areas currently have very different characteristics and are relatively separated from each other.
DCS80	Janet	Goulton	London City Airport Limited				2. It is encouraging that in the Draft Core Strategy, Greenwich Council has recognised the locational advantages of being nearby LCA (1.5.4). 3. Should you require further reference points regarding the economic benefits that may be derived from proximity to LCA, we would direct you to the recent study by York Aviation Limited on the economic impact of the Airport, which will be available on our website from 14 February 2011. This research demonstrates that LCA contributes in excess £½ billion to the UK economy each year.		Comment noted. No action required.
DCS81	Linda	Hodgson	Heathway Residents Association				p13 1.5.9 This paragraph should be updated to acknowledge residential gardens as being a major component of land use in the borough	Greenwich Riverside p19-20 1.5.37-41 We assume that the omission to mention of the Heath was an oversight, which will be rectified.	It is not felt that it is necessary to mention residential gardens here. Mention of heath has now been added.

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DCS86	Claire	Craig	English Heritage - London Region					English Heritage welcomes the broad character analysis at the commencement of the Draft Core Strategy document but is of the view that this would be more effective if it covered the historic environment of each place rather than just some key heritage assets. As discussed in respect of the Sustainability Appraisal, there is a need to convey that heritage has been considered in full and not confined to Greenwich. We acknowledge the consideration of the Royal Arsenal in the context of Woolwich however the treatment of it is so cursory as to mask the story of the areas decline. Six of the buildings in the Royal Arsenal and Royal Artillery Barracks site are on English Heritages Heritage at Risk Register. The closure of this site is fundamental to understanding the areas decline and its regeneration should be at the heart of the areas recovery. We have jointly funded studies with the London Borough of Greenwich on this area which would be valuable evidence for how it might be developed see Woolwich Town Centre Historical Assessment and Character (May, 2005) and the Woolwich Town Centre Urban Design Framework (2007). It is clear from the image used to illustrate the section on Charlton that Charlton has heritage of significance. While its industrial heritage is briefly outlined, the relationship between this and part of the areas selection as the focal point for new housing remains opaque. Residential character is referred to but it seems likely that the area has conservation areas and archaeological resource that are unacknowledged. Similar comments could be made in respect of all of the Boroughs places. On a more detailed note, we advise that elements of Eltham Palace are listed as a combination of Grade I (the Medieval Hall) and Grade II* rather Grade II as stated at paragraph 1.5.43 on page 21. This is a very significant	This section provides a brief summary of each place within the Borough and aims to describe those features that define and characterise these places. It is not possible to provide a detailed description of all of the historic environment, therefore, in such a summary. Charlton's heritage significance has now been noted. Details of the listing of Eltham Palace have been updated.

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								heritage asset that needs to be correctly identified and perhaps play more of a role in plans to upgrade the role of Eltham in the Core Strategy.	
DCS84	Anna	Townend	Greenwich Environment Forum				Yes, with the proviso that the large number of short/long term new residents of the Borough and the taxes they currently contribute is not enough to justify any large increase in new build local authority/housing association, subsidised accommodation.	Too much of for economically productive land has been removed from industril/productively generating income locally and globally, and not enough zoning for regenerative new business particularly 'starter' seed bed spaces created for young entrepreneurs/craftspeople.	It is the intention that any future redevelopment of business space will feature units for a range of business sizes.

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DCS85	Frank	King					1.5.2. The first point that I would like to make on behalf of everybody over 50 is that we have great difficulty in understanding the facts and figures given in the Core Strategy Document when they are given only in metric measurements such as Hectares and Kilometres with out the conversions to Acres and Miles etc. for the older residents, trying to visualise information given in metric measurements is extremely difficult, as we were educated when Imperial measurements were taught in schools. We can visualise Miles, Yards, Feet and Inches; in particular Acres. Very few people over 50 have any idea what a Hectare is, let alone imagining what an area given in Hectares represents, but if asked how big an Acre or a Square Mile is they could visualise it without thinking about it. It would be extremely useful if all measurements and quantities throughout this, and any other published documents, were written with Imperial Measurements in brackets. at least for the next twenty years or so until those, like myself, who were only educated in Imperial Measurements have kicked the bucket. It really does put us, the over 50's, at a great disadvantage when reading these documents. 1.5.2. It would also be helpful to list the twelve Boroughs in the Thames Gateway and detail, with a map, highlighting the whole Thames Gateway area including those parts of Essex and Kent which are included. Therefore the first map, in 1.5.2. should show the whole of the Thames Gateway highlighted, with measurements shown if possible. i.e. the miles of Thames waterfront involved and the distance from the banks of the Thames if possible in as much detail as possible. (Shaded areas on each bank of the Thames would do). 1.5.111 think that the "shortage of affordable housing" would be better described as "a severe shortage of both affordable and privately rented housing in Greenwich ".	1.5.22. I believe that a specific mention of the seven ancient monuments by name might enhance the document; indeed an appendix listing and giving brief details of all of the historic buildings and monuments would be a very positive advantage to anybody reading the document. In particular it would enhance the opinion of anybody from outside the Borough who reads it, as they will not have any idea about the extent of the Borough's historic past and it's present wealth of historic buildings and locations of interest, but an appendix listing the most important places of interest which do, or could, attract visitors could be used, not only for this document, but for all other G.B.C. documents which aim to increase the visitor footfall. 1.5.23. It should be noted that both the Water Authorities and G.B.C. appear to be a little more complacent than the figures allow with regard to the Thames River water levels. It has been estimated that another four feet on the overall flood barriers below the Thames Barrier will be needed before 2025 due to the increasing level of the highest flood tides from the North Sea. These will be relatively rare incidences, but none the less common enough to cause very severe flooding when they do happen. Estimates vary, but the average appears to be flood events every third year on average. (See also 6.1.1. para 21). 1.5.24/25/26. I do not know if any research has been done on Aircraft Pollution in, or rather over, the Borough, but it has occurred to me that with the London Airport over flights and the aircraft stacking from both Gatwick and Heathrow, the possible pollution from aircraft is not only a possible health threat, but a probable one. This aircraft pollution will go some way to explain the poor health within the Borough. I admit that there may be little or no adverse effects of aircraft pollution. I firmly believe that a study should be carried-out to establish the	It is felt that to include all of the Scheduled Ancient Monuments here is too detailed. The section on the current state of the Borough is only to set the scene and does not require this level of detail. The same point applies to mention of the caravan site. The Council is aware of the flood risks in the Borough and has completed a flood risk assessment to look at this. The Environment Agency are currently considering future options for the Thames Barrier. No research has been done on pollution from airplanes but it is not felt that is significant enough to warrant further assessment at this stage. Policy IM1 emphasises the need for appropriate infrastructure to be delivered with development. The Metric system has been in use since 1965. It is not feasible or desirable to give Imperial values alongside each Metric value. Detailed mapping of the Thames Gateway is not appropriate for the Core Strategy.

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								facts. 1.5.50. A note of caution may be relevant here, as the same mistakes could occur in the many planned new developments. Thamesmead did not have transport infrastructures in place when it was build and these infrastructures were not allowed for. Since Thamesmead was built little or nothing has been done to remedy this. The same thing could happen if transport infrastructures, shops and community centres (like Schools, Doctors and Dentists surgeries) are not built-in to the development plans right from the start of the process. 1.5.53. I also feel that a little more could be said about the Abbey Wood Caravan Site; this is a little known amenity which is hidden from the road and few residents of Greenwich are aware of it. It could benefit from a little more publicity as it is a bit underused at present. It might be used by local residents, or rather their families and friends, for visits where there is little or no room for them to stay with them; a much cheaper alternative than hiring accommodation. It might also encourage visitors to the Borough especially in the "off' season if it were better known.	

Question 3 – Spatial Issues – Do you have any comments on the spatial issues identified?

	Consultee			Agent				
D	Given Name	Family Name	Company / Organisation	Given Name	Family Name	Company / Organisation	Spatial Issues (Refer to section 1.6) - Question 3: Do you have any comments on the spatial issues identified?	Officer response
DCS7	Sheila	Field					Section 'Environment and Climate Change'. Your comment about the existing flood defences affording the riverside areas a high level of protection. My understanding is that the Thames Barrier is already considered inadequate to meet rising sea levels. Also, insurers will not insure against flood any new dwellings planned in the Thames Gateway area. There is a serious insurance problem.	Insurance of houses is beyond the scope of the Core Strategy. Can confirm that existing flood defences are sufficient and that Council is continuing to work with the Environment Agency and developers to ensure an appropriate level of protection is afforded to the riverside areas of the Borough.
DCS8	James	Williams	London - Abbey Wood Congregation of Jehovah Witnesses				The spatial issues contained in the document are in-keeping with current and projected needs.	noted
DCS9	Paul	Webbewood					Paragraph 1.6 states that: 'accommodating this high level of population growth in the Borough is a significant challenge.' Indeed there are other estimates which suggest an even higher level of growth by 2031 (see Nick Raynsford MP in Hansard 3rd June 2010 Col 690). I agree that this level of growth represents a significant challenge and one which the Borough may not be able to meet successfully. I believe therefore that the Council should try to keep population growth to a lower level and support the alternative spatial strategy as set out in para 3.4 in preference to the Council's favoured strategy.	The population estimates have been based on the Office of National Statistics. Support for the alternative spatial strategy noted
DCS22			Novalong Limited	Richard	Jones	Planning Perspectives LLP	With respect to Housing, the requirement is to deliver a minimum of 25,950 homes between 2011-21. The word 'minimum' should therefore be inserted in the first sentence of the first bullet point between the words 'Plan' and '10-year'. The first bullet point under Environment and Climate Change does not recognise that there are some non-public open spaces not worthy of protection or enhancement. Therefore, an extra sentence should be added to that bullet reading:" However, where open spaces do not fulfil a public function and there is no strategic need for their retention, consideration should be given to their development potential in order to further the strategic objectives of the Core Strategy.'	Agree to put in the word 'minimum' in referring to the housing target as suggested because it is in the London Plan and in Core Strategy policy H1. Disagree with suggestion the Council should ease the protection of existing open spaces as is suggested. The open space designations will not be changed on a case by case basis but only through the development plan process.
DCS25		Waite					The spatial issues identified do not exist in isolation; and one of the greatest challenges underpinning them is the need to change the mind-set of those who have low aspiration, low educational attainment, little self-discipline and too great a sense of 'entitlement'. Unless there is change here, many of the spatial challenges (esp economic activity/employment and cohesive communities) will be incapable of realisation.	Social issues such as low aspiration and self-discipline raised in these comments are outside the remit of the development plan. Agree that spatial issues don't exist in isolation.
DCS32	Nicolas	Long					I agree with the need to increase school places but for many in Ashburnham area nothing seems to be done about this.	Noted. There is a need to ensure the growth in population is matched by an associated increase in school places in the most appropriate locations.
DCS33	Caroline	Evans					The document states that "delivering such a high amount of housing that is well designed and of good quality will be a challenge". This section also states, in relation to schools, that "the challenge is to ensure that strategies are put in place to enable the Council sufficient flexibility to deliver increased school places in the required locations"; recent developments in our area have, again, not risen to this challenge and have taken place entirely against the grain of the Draft Core Strategy document, which specifically says that developments should not proceed without improvements to the infrastructure to accommodate these developments .	Noted. There is a need to ensure the growth in population is matched by an associated increase in school places in the most appropriate locations

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D	Given Name	Family Name	Company / Organisation	Given Name	Family Name	Company / Organisation	Spatial Issues (Refer to section 1.6) - Question 3: Do you have any comments on the spatial issues identified?	Officer response
DCS36		LXB Retail Properties PLC	LXB Retail Properties PLC	Lucy	Eady	WYG Planning	LXB support the observations regarding Town Centres under Section 1.6 of the Draft Core Strategy, including the comment that as competition continues to increase from existing centres, as well as new centres, the challenge will be to gain trade back from them, whilst continuing to improve the Borough's town centres as a whole. However LXB would recommend that the second bullet point under "Town Centres" be altered to read: 'There is new retail, office and leisure development planned for the Greenwich Peninsular, Woolwich and Charlton Riverside. It is important that any such development complements the Borough's other centres and does not draw trade away from them'.	Noted. There will be mixed use development at Charlton Riverside but we will not be creating a new town centre there so it would be inappropriate to include specific mention of it in the second bullet point as is suggested.
DCS42			Greenwich Peninsula Regeneration Ltd	James	Wickham	Gerald Eve	We note the reference to development at Greenwich Peninsula complementing other centres and not drawing trade away from them. This is in accordance with national policy in PPS4. However we do have concerns regarding the detailed policy seeking to implement this objective as set out below in respect of Policy TC5.	Noted
DCS43	Barbara	Reid					The document states that "delivering such a high amount of housing that is well designed and of good quality will be a challenge" that is proving to be the case in developments alongside Greenwich High Road. This section also states, in relation to schools, that "the challenge is to ensure that strategies are put in place to enable the Council sufficient flexibility to deliver increased school places in the required locations"; recent developments in our area have, again, not risen to this challenge and have taken place entirely against the grain of the Draft Core Strategy document, which specifically says that developments should not proceed without improvements to the infrastructure to accommodate these developments .	There is a need to ensure the growth in population is matched by an associated increase in school places in the most appropriate locations.
DCS45	Peter	Rice					well detailed	Support noted
DCS46	Susan	Proudfoot					Environment and climate change. Good that protection and enhancement of open spaces is seen as a priority. Air quality is also to do with traffic congestion as well as development. Cohesive and Healthy communities. - an issue is to improve quality and performance of schools as well as increase number of school places . Many children leave the borough for secondary education. Infrastructure- mention should be made of reliance on ageing Blackwall Tunnel and problems its brings of congestion and pollution (air and noise) to the borough. Borough needs to keep lobbying hard for a new bridge!	Comments noted
DCS60	Lawrence	Smith	Westcombe Society				WS welcomes the identification of underused and vacant land and the need for it to be brought into use.	Noted
DCS77	Geoffrey	Belcher	Maritime Greenwich World Heritage Site				1.6 Economic Activity and Employment Where there is a reference to increasing visitor numbers in the World Heritage Site as a positive consideration it is also important to mention the need to protect the "Outstanding Universal Values" of the Site which may be adversely affected without appropriate safeguards. 1.6 Design and Heritage The reference to the need for "sensitive" development in respect of schemes associated with Maritime Greenwich is welcomed.	Second bullet point of Economic Activity and Employment is believed to be sufficiently robust. Support for wording of second bullet point of Design and Heritage noted.
DCS81	Linda	Hodgson	Heathway Residents Association				Environment and Climate Change p26 We would like to see Bullets 3 and 4 reinforced by making specific mention of residential gardens and shrubbery, as well as trees Infrastructure p27 We would like to see Bullet 1 updated to reiterate that developments will only be approved either in unison with or conditional on funding and detailed plans for delivering the supporting infrastructure	Noted In bullet point three of Environment and Climate Change it says 'including' so is not an exhaustive list and it is not felt necessary to make specific mention of gardens, shrubbery and trees. It is felt that the suggested change to the first bullet point of Infrastructure is not appropriate and that this matter is already addressed through the infrastructure policies (see IM1).

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D	Given Name	Family Name	Company / Organisation	Given Name	Family Name	Company / Organisation	Spatial Issues (Refer to section 1.6) - Question 3: Do you have any comments on the spatial issues identified?	Officer response
OCS84	Anna	Townend	Greenwich Environment Forum				Agree on growth in job opportunities, enhancing town centres, enhancing and increasing open spaces, safeguarding and increasing areas of biodiversity including town treescapes and woodlands creating new areas of rural 'buffer zones' and enhancing riverside ecology and waterways.	Noted
OCS85	Frank	King					1.6.1 (Population): I firmly believe that your estimate of 288.000 by 2027 is erroneous. The population of Greenwich is almost certain to exceed 300,000 and may exceed 325,000 taking into account the large influx of new tenants due to the extra housing being build (assuming that the housing list remains the same, or increases (as I believe it will)) and the very high increase in live births, which are set to continue, or even increase, over the next twenty-five years. There is even a possibility that the population may increase to 400,000. 1.6.1 (Housing): As far as I can see there is a potential problem in building too many of the required 26,000 houses having three or more bedrooms; this being that, within a relatively short period, these houses will be purchased through the 'Right to Buy' legislation which will do extensive harm in the future to the housing stock, putting us back in the same position yet again where we are short of housing. One possible solution to this problem , allbeit a partial one, is to build as many of the required 3, 4 and 5 bedroom dwellings in blocks of flats. This would of course not prevent their sale, but would mean two things. Firstly that they would eventually return to Council Stock after the lease ran out, and secondly that they would provide a little income through the lease-holder fees paid. These two things might well deter the sale of these properties to some extent at least. Also, if blocks of flats with 3 to 5 bedrooms were build, it would seem to me that a great deal more could be done to reduce the carbon footprint of such properties over and above what could be done in separate houses. Such blocks would not have to be, nor should they be, Tower Blocks. They could, and should , be Low Rise, two to four stories, five at most. Although, where suitable, Tower Blocks could be considered. 1.6. I. (Economic Activity and Employment) (para 2): Would it be possible to en courage the use of the Bed and Breakfast sector , at least in the short-term until the Olympics are over, by some form of Council Tax Relief and/or Grants to improve B & B Facilities. These measures, together with the compilation of a comprehensive list of B & B's in the Borough might encourage more visitors to stay longer. It should be understood that any such list of B & B's should include all price ranges and should be as widely distributed as possible. The first locations being the Tourist Information Offices both in the Borough and, if possible, Nationally and of course on the Greenwich and Olympic Websites. 1.6. I. (EA&E paras 3, 4 & 5): Care should be taken when building so many new houses that valuable Industrial Sites should not be eaten up. If the Council want to in crease local job prospects, as I am sure that they do, they must ensure that there are enough Industrial Sites remaining within the Borough for future expansion in the employment sector. 1.6.1. (Infrastructure) (Para 2): I believe that Greenwich should to be the leading London Borough and strive to be the leading Local Authority in the British Isles in recycling. We already have a fairly good record in this department, but we could do much better. Greenwich should be completely self-sufficient in waste disposal, with Waste Disposal Plants that can handle all types of waste. As I understand it there are four types of recycling plants or methods viz: Dry Waste Recycling, Incineration , Green Waste Composting and finally White and Electrical Goods Recycling. I, and I am sure many others in Greenwich, would dearly like our Borough to be the first Local Authority in the Country to have all four Waste Disposal methods in our Borough and thereby becoming the template for all Local Authorities. Why do I hold this view? Simply because waste disposal is very expensive. We in Greenwich have a simple choice; we can pay vast amounts of money over the next fifty years to have other Companies dispose of our waste for us, or we can	The population estimates are based on ONS projections. Housing mix will be delivered through implementation of policies. Industrial sites will be developed further at the White Hart Triangle but Charlton Riverside is underused and can be partly released from safeguarding. Some other points are beyond the scope of the Core Strategy. Other points are noted.

D	Consultee			Agent				
	Given Name	Family Name	Company / Organisation	Given Name	Family Name	Company / Organisation	Spatial Issues (Refer to section 1.6) - Question 3: Do you have any comments on the spatial issues identified?	Officer response
							build our own Recycling Plants and be paid a great deal of money to process other people's waste. If G.B.C. were to commit to building all four types of Plant over the next 25 years, we, the people of Greenwich , could all benefit from the continuing income from these facilities. An enormous amount of money would have to be raised (I will come to this later), but the important thing is that there must be no PPI involvement under any circumstances if we are to reap the benefits and establish an ongoing system of replacing these Plants when they come to the end of their useful lives. PPI put simply put is a licence to steal money from others without risking one penny themselves. We have one very good Recycling Plant at present, but we lack our own Plants for the other three disposal methods (with the exception of a 2% stake in the Lewisham Incineration Plant). It should also be noted that the Nathan Way Plant is PPI and we get very little profit from it. I believe that the way forward is long term planning by building, for a start the long planned Composting Plant at Nathan Way, followed by an Incineration Plant to replace the Lewisham Plant when it's life comes to an end in about ten years, and then an Electrical Reclamation Plant. After this we should build a Dry Waste Plant, bigger and better than the present one at Nathan Way, to replace it when it reaches the end of it's useful life in about 20 years time. We should commit to this venture now as it will take five years to put sufficient funding together and a further five years to plan and build the first two plants and bring them into full operation. I would suggest that the first Plant to be built should be a Composting Plant. Greenwich (and the South-East) are badly in need of a Compost Facility. This has been talked about in Greenwich for the last seven years. Research has been done, the will is there, a site has been chosen, but the finance has been too difficult to arrange so far. Now is the time to invest in this project, it will actually earn Greenwich much needed income when it is up and running, which could be used to invest in the Combustion Plant. I do not know of any Compost Plant in the South-East; even if there were one, there would be more than enough compostable rubbish IN Greenwich and neighbouring Boroughs to feed this Plant. Next should be the Incineration Plant. The Lewisham Plant is unlikely to be replaced as Lewisham will have great difficulty finding another site to rebuild on and the present site will attract too much public opposition, even if it were possible to rebuild on the same site which I doubt. Even if the Lewisham Plant does continue to be active after ten years, or another Plant is built in Lewisham, a further Plant is badly needed in the South-East, which would attract Rubbish for Burning from many London Boroughs and also many Kentish Local Authorities. The best place to build both of these Plants would be on the River Bank so that the Compostable Rubbish and the Rubbish for Incineration could be brought by river as well as road. This would mean that the Plant could attract rubbish for disposal from much farther afield. Also a much larger (and therefore more economical) Plant could be built. The River could then be used to carry away the small quantities of waste, left after processing, for disposal in the most economic way. Obviously a Riverside Site would also be much more suitable from the Environmental perspective and would attract much less local opposition during the Ten Year Period when the Plants are being planned and built. I am aware that an Incineration Plant has recently opened in Belevedere. This does not change my views in any way. There are still too few Incineration Plants in the country and there is more than enough waste which needs burning now and the quantities will increase exponentially in the next 25 years. We can be ready to process it and make a profit from it. The last of these Plants to be built should be the Electrical Reclamation Plant. I say this because the technology is not up to standard yet and could become defunct before it was fully up and running. If any Council Member thinks that PPI is a good idea, let them get PPI funding for this Plant. I doubt that they will be able to because the risk is too great and PPI's simply do not take any risks. And now to	

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							my Financing Suggestions: I suggest that a Greenwich Bond could be floated to pay for these four Plants. As you will probably need funding over about 10 to 15 (possibly 25) years and you will want to ensure that few, if any, bonds are redeemed before the first 10 to 15 years are up, I would suggest that Interest should be staggered so that on the first anniversary 0.5% is payable and then Interest is staggered up to 15% including a termination bonus of 2.5% if the bonds are held to full 25 year term. By the time the bonds are redeemable with the 2.5% bonus both the Composting Plant and the Incineration Plant should be up and running and showing a profit, which would then fund the building of other two Plants and all of the replacement Plants for the four Types of Recycling for as long as the Local Authority System exists and will finance many other G.B.C. Services over the years. There should be two types of Bond offered. The first should be for Residents of Greenwich, Lewisham, Bexley and Bromley (hereafter referred to as Premier Bonds) and are only available to individuals who reside in those Boroughs, and should be priced at £100.00 each to make them well within the reach of everybody. Perhaps there should be an upper limit of £10,000.00 per household to avoid bond market traders from buying too many. Please note that if you do decide to issue Premier Bonds, I would like to be the first person to buy some, as it is my idea and I would like to support this project if it ever comes to fruition. These Bonds would be 25 year Bonds but redeemable at any time after the 1st anniversary. They would be on sale for five years and would attract a simple interest rate of 0.5% on the 1st anniversary; 1% on the 2nd anniversary; l.5% on the 3rd anniversary; 2% on the 4th anniversary etc. until the 15th anniversary when they would be worth 12.5% plus a 2.5% bonus making them worth 15%, or £115.00 each. By this time the Plants would be up and running and making a profit. The Council could then extend the Bonds for a further 10 years at 1% per annum, making them worth £ 125.00 per Bond. This would be a special loyalty bonus to all those who had held the Bonds for the full asking period of 25 years. The Second Bond Issue, hereafter called the Commercial Bonds. would be issued after 5 years from the issue of the Premier Bonds, or they could be issued at the same time if the Council wished, but the main funds would not be required until the 5th year, or until building starts on the Incineration Plant (which is where the majority of the funds will be needed). These Commercial Bonds would be offered on the normal Bond Markets and would be a Fixed Term Bond for 10 years at 8% (or up to 10% depending on financial advice). I firmly believe that 8% would be a very good offer price under present conditions. These bonds would be priced at either £5,000.00 or £10,000.00 each. So, to sum-up, Finance should be raised for these Recycling Plants in the following ways: Local Residents Bonds (Premier Bonds) Approximately 20% of Total. G.B.C. Funds. Approximately 20% of Total. Commercial Bonds. Approximately 40% of Total. Lottery Funding. Approximately 10% of Total. Other Local Authority Shares or Bonds in the project could be offered to neighbouring L. A.'s. I would not expect more than 10% of the total from them. Normal Bank Loans. For the balance of the project. All of the above to be raised as required throughout the next 15 years as necessary, but no PPI involvement at all. My overall vision is that in 50 years Greenwich has all four Plants running profitably, and self replacing forever from their profits, with no cost of Waste Management to the people of Greenwich. As far as the new incineration plant at Belvedere is concerned, this would be an advantage, as the Greenwich Plant would not be on line for at least ten years (2020) and by that time the need for more Incineration of Waste in London will have grown considerably. Arrangements for the transportation of waste by all Local Authorities along the River Thames would be much easier to plan for if there were two Incineration Plants in the same area of the River. Barges and Lighters designed for waste transportation would be worth commissioning and	

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							the building of Riverside collection Wharfs would be worthwhile. Because these Wharfs would be used for Waste going down the River to the two Incineration Plants, they could also be used for many other things, including all of the other recycled waste being transported for processing and waste being sent for Composting (hopefully to our own Plant in Greenwich), where this method (Composting may not have been considered because there was no Composting Plant in their L.A. area. Needless to say, the savings on pollution and costs associated with Road Transportation of waste would be a considerable saving. Imagine the effect of removing thousands of lorry loads of waste being carried on overstretched London Roads. There could also be great savings on land in the other Local Authorities along the River, as smaller areas would be required for the storage and separation of waste when a regular daily system of Barges and Lighters could carry waste away without the need for storage. Waste could be loaded directly onto the Barges from the collection rounds in all of the other London Boroughs without having to go to a local depot. The Wharfs could be located along the River in such a way that three Boroughs could use the same Wharf, thereby reducing the number of Wharfs needed; saving investment funds and land. The above long term plan would, of course, require the blessing and cooperation of the Mayor of London, but it would benefit the whole of London. Having said that I realise that perhaps another five years of planning might be required to put the overall plan into operation, but I firmly believe that these long-term plans should be proposed and pushed forward within the current Draft Core Strategy Document. One final note: As soon as possible, after all of the Plants are running in profit, all ancillary equipment, like Collection Lorries, should be purchased outright and serviced by a Council owned garage. 1.6.1. (Infrastructure) (Para 3): I am sure that you are fully aware of the many transport infrastructure problems within the Borough. Frankly I cannot see how you can do very much to alleviate the long standing problems, like the poor North/South division, but I am sure that you must realise that it is essential that you learn from the mistakes made in Thamesmead and the current problems North of most of the A206 from Anchor and Hope Lane to the Ferry. I simply have no idea how to solve the Lower Road bottle neck, particularly through Greenwich Town Centre, which is going to get very much worse with all of the new developments planned. If 100 yards of Riverfront had been kept clear of housing in the past, we could have built a Riverside Relief Road right into London, like the Pacific Coast Highway in America. Once you build houses on any land , the land is then tied-Up for at least 100 years, and probably forever. This does not mean that there would not be any building on this 100 yards of Riverbank exclusion zone. Factories; Recreation Areas; Landings; Wharfs; Roads and Walkways and any publicly owned buildings like Schools and Offices are acceptable as these buildings can be demolished if necessary, without ownership problems being an issue , if a road is needed, or to facilitate River Related developments in future. But because of the short-sighted planning, allowing housing to be built along the River, these possibilities are moot. We have lost a great opportunity to be able to use the River and the Riverbank to it's fullest potential in the future. Having said this, there is one thing that could solve a lot of problems, which is an extension of either The DLR or Crossrail from either Woolwich Arsenal or Abbey Wood to New Eltham Rail Station with four stops in between. Although I would truly hate to suggest that we should lose part of our history by moving the Woolwich Free Ferry, I think that a tunnel connecting the A205 directly to the A406 is the only logical solution to the chaos and traffic jams caused daily on both sides of the river. If such a tunnel was built from the end of the A205 at the Ferry Approach, which is the best possible site on this side of the river (it has just enough land in the vicinity of the Ferry for the Tunnel Entrance). Perhaps the Ferry Service could be moved up River to the Peninsula	

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							near the 02, this might then help Road Traffic flows and provide another route for the users of the 02. If this is not possible, perhaps it would be possible to re-locate the Ferry further down the River at Abbey Wood or Thamesmead providing at least some relief for the need for a River Crossing in this area. I suggest this as an alternative to the Thamesmead Crossing which I really do not think is feasible due to the lack of connecting roads on this side of the River. This might also take some pressure off of the new developments in Charlton and the Peninsula developments, not to mention Greenwich Town Centre. I do have one personal point that I would like to raise, which is the lack of busses from the Woolwich and Plumstead area to the Ferryview Medical Centre in John Wilson Street. It is already very difficult for me to walk up the hill to get to see the Doctor or Nurse and this will only get worse as I my health worsens. I do /lot want to change my Doctor as I have been his patient for many years and Ferryview offers many more medical services than I could get from any Surgery nearer my home. A simple solution would be to re-route either the 291 or the 244 to call a Ferryview. I mention this only to illustrate the problems caused to people in general when transport links are not fully thought-out when new developments take place and when essential services, like Ferryview, are built in an ill considered location with regard to their primary use , in this case disabled people. A Doctors Surgery built on the top of a hill with insufficient transport links is crass stupidity.	
DCS90	Abraham	Mansoor					You ought to have had some level of consultation before introducing this questionnaire. Why asking the residents after you have had your own ideas of this "SP" in Greenwich?	It is incorrect to suggest there has not been consultation before introducing this consultation. During the initial Core Strategy Issues and Options Consultation in February 2008 the public were involved in proposing options for addressing a number of different planning issues in the borough. During this consultation the public were welcome to suggest any other reasonable alternatives to the strategy and policies put forward. Additional consultation is taking place on the proposed submission version ahead of an EiP in Summer 2013.

Question 4 – Vision – Do you have any comments on the vision for the Borough?

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ID	First Name	Surname	Organisation	First name	surname	Organsiation	Vision (Refer to section 2.1) - Question 4: Do you have any comments on the vision for the Borough?	Council Response
DCS4	Lucy	Owen	Port of London Authority				Vision, Themes and Strategic Objectives References are made to the waterfront area of the Borough being transformed with the primary focus of development being to provide housing. It is not made clear in the vision, themes or strategic objectives that the Borough's safeguarded wharves would continue to be protected for cargo handling uses in line with Policy 4C.9 of the London Plan. It also needs to be made clear that any development next to or opposite the safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance. For example, Greenwich Peninsula is home to Victoria Deep Water Terminal and Tunnel Glucose and both of these wharves are safeguarded yet the text at 2.1.3 states that a significant proportion of the Borough's new housing will have been accommodated here.	Safeguarded wharves were set out in Policy EA(b) in the Draft Core Strategy and are now in IM5 of the proposed submission version. It was not felt necessary to include reference in the Vision to wharves.

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ID	**First Name**	**Surname**	**Organisation**	**First name**	**surname**	**Organsiation**	**Vision (Refer to section 2.1) - Question 4: Do you have any comments on the vision for the Borough?**	**Council Response**
DCS13	David	Kerr					The "Vision of Greenwich 2027" (pages 30/31 et seq) appears to have been drafted with little regard to present day economic and financial realities. I am sure the authors are correct to include (page 36) a section called "Things we cannot change". But a thing we cannot change which is not addressed in this draft is the unlikelihood that public or private money will be available for major projects such as additional river crossings or the proposed mixed use urban quarter at Charlton Riverside. While it is possible that some funding may become available in due course which may eventually permit one or two major projects, the present difficulties with and delays to the major project at Kidbrooke suggest strongly that the draft core strategy is unrealistic. The November 2010 draft does not appear to recognise the effects of the present economic downturn. I hope the next draft will be more realistic.	The delivery sections deal with how the Core Strategy will be implemented. Whilst it is agreed that it is important to consider the current economic situation it is also important to remember that the Core Strategy covers a 15 year period in which the economic situation is likely to change (possibly several times). To write a strategy using current economic circumstances only would be unrealistic.
DCS22			Novalong Limited	Richard	Jones	Planning Perspectives LLP	The Vision places too much emphasis on development in the north of the Borough, particularly in terms of housing provision. It does not recognise the potential for and benefit of residential development on appropriate sites in the south of the Borough. The Core Strategy should play a full part in the realisation of the Mayor's Spatial Strategy as defined in the draft Replacement London Plan. In particular, no mention is made of partnership-based, cross-border working, as envisaged in Policy 2.5A and Paragraph 2.22 of the draft Replacement London Plan.	The Core Strategy reflects the London Plan and its opportunity areas, which are predominantly indentified in the north of the Borough along the Riverside. Cross borough working and partnership working are addressed in the delivery section of the Core Strategy.
DCS24	John	Franklin	Greenwich Society				This section presents a deliberately idealised and attractive view of the future, and as such we have no comments on it the problem, of course, will be to make it happen.	Comment noted
DCS25		Waite					Yes. It will not be implemented successfully without adequate (massive) funding and a mind-set change. As currently written, it is viewing the future through rose-tinted spectacles and is over optimistic especially as regards economic growth, public transport and Olympic legacy.	Comment noted

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ID	**First Name**	**Surname**	**Organisation**	**First name**	**surname**	**Organsiation**	**Vision (Refer to section 2.1) - Question 4: Do you have any comments on the vision for the Borough?**	**Council Response**
DCS33	Caroline	Evans					What are the plans to address and improve the architectural character of the borough in the overall vision? The borough has been badly served by planning and building in the recent and medium term past and this has created areas of poor architecture. Eyesores such as the Ibis hotel and the Novotel do not add to the character of the borough. In particular, post war building took no account of the historic architecture, and nor did it provide high quality new design approaches. Examples of this in Greenwich Riverside are: the north side of Gloucester Circus, parts of Burney St, Greenwich High road from the Station towards Blackheath Hill. I'm not arguing for retrospective fake georgian architecture: I am interested in new and vibrant design which would add to the character of this brilliant borough. We must ensure that the unique feel of the borough is maintained - this is one of the reasons tourists visit us.	Para 2.1.12 states 'New development within Greenwich will have provided high quality architecture and urban design'.
DCS40	Clare	Kemsley					I live on Greenwich High Road and feel strongly that there should be appropriate detailed long-term plans for the area's development. In particular, we need a supplementary planning document for the immediate area. I make particular reference to the two strategic objectives of the Draft Core Strategy: to protect and enhance Greenwich's rich natural and built heritage, to promote high quality architecture and urban design in all developments in Greenwich. It's important that Greenwich High Road sees effective implementation of these objectives. A lot of piecemeal development has already happened or been planned, and I don't think that it all meets these criteria. However, we should not assume that it's too late to implement more appropriate planning. Immediate steps should be taken to make sure any further development is planned and controlled with a supplementary planning document or equivalent neighbourhood plan. The architectural character of the area should be improved (or maintained where appropriate), rather than worsened by development. And it must have a positive impact on the experience of current and future residents. I am keen to continue living on Greenwich High Road and I hope that new developments retain what's good about the area, and make real improvements where necessary. However, we can't rely on piecemeal planning to achieve this. I have strong concerns that without appropriate long-term planning, it may deteriorate as a residential area rather than improve. I hope the council is able to ensure that a supplementary planning document is produced for our area.	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

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ID	**First Name**	**Surname**	**Organisation**	**First name**	**surname**	**Organsiation**	**Vision (Refer to section 2.1) - Question 4: Do you have any comments on the vision for the Borough?**	**Council Response**
DCS42			Greenwich Peninsula Regeneration Ltd	James	Wickham	Gerald Eve	We welcome and support the vision set out at 2.1.3 for the Greenwich Peninsula. However the scale of the development on the Peninsula is significant and it has recognised national and international importance as an entertainment venue. The North Greenwich Centre will therefore play a more important role than a District Centre providing solely for the needs of local residents, as suggested within the Core Strategy. We have expanded on this topic in our comments, below. We suggest that paragraph 2.1.8 makes reference to the permitted cable car link between the Peninsula and the Royal Docks. This will be an important addition to the Boroughs transport infrastructure and it is hoped it will be operational well before 2027.	Support noted. The Cable Car is referenced elsewhere in the Core Strategy. The permission for retail development does not meet the figures required for designation as a Major centre as set out in the London Plan which states that Major centres generally contain over 50,000sqm of retail floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions. Changes to the retail hierarchy are to be done through the London Plan.
DCS43	Barbara	Reid					It is hard to comment on anything that is part of this vision, partly because it contains so little detail. However, because of recent Creekside and High Road developments, I don't feel that optimistic. There needs to be much more consultation and communication than there has been.	The spatial strategy and policy sections of the Core Strategy set out in detail how the 'high level' vision will be achieved. There has been significant consultation on the Core Strategy. The Issues and Options Document was consulted on in 2008, followed by consultation on the Draft Core Strategy in 2010-2011. This included 11 public exhibitions, 6 workshops, press releases and posters. There is consultation on a proposed submission version before a public examination by an independent inspector.

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ID	**First Name**	**Surname**	**Organisation**	**First name**	**surname**	**Organsiation**	**Vision (Refer to section 2.1) - Question 4: Do you have any comments on the vision for the Borough?**	**Council Response**
DCS86	Claire	Craig	English Heritage - London Region				The Core Strategy vision for heritage is stated in very generic terms with mention of the Maritime Greenwich World Heritage Site as a kind of local qualifier. This does not appear to enable the development of a positive, proactive strategy for the area's historic environment as sought by PPS 5. The issue is apparent in the characterisation and spatial issues sections. For example, the need to integrate new development into existing built and natural environments in a way that is beneficial is identified as a Design and Heritage spatial issue in paragraph 1.6.1 on page 26. However, no indication is given as to where that integration should happen in order to best protect and enhance the historic environment. A further example is that heritage assets such as Blackheath and Lesnes Abbey Woods are not acknowledged as such in the characterisation paragraphs and their role in strategic heritage projects such as the Green Chain also appears to have been overlooked when this may form a Spatial Issue for Design and Heritage.	Comment noted, no change required
DCS59	Judy	Smith	South Greenwich Forum				Where is the south of the borough in the 2027 vision, and where are Eltham and the south in the overall Spatial Strategy section?	The vision has been amended to include the non-growth areas
DCS69	Laurie	Baker	Eltham Society				Although we accept that most development over the next 15 years will be in the northern parts of the borough, there should be mention of what part Eltham and the south of the borough will play in Greenwich 2027. There is a rich heritage here and it is a vital piece of the borough that should be included as part of the future. Paragraph 2.1.9 should include links on the Green Chain and Metropolitan Open Land in the south of the borough as they make a significant contribution to biodiversity and quality of life as well as in the north.	The vision has been amended to include the non-growth areas The Green Chain has been added to the Vision in paragraph 2.1.10.
DCS46	Susan	Proudfoot					2.1.10 Not clear how Greenwich will be viewed as a "sporting destination" - will there be additional lasting sporting venues- all of Olympic Games venues in the borough will have been dismantled or returned to previous use.	The sporting legacy from the Olympics will include an equestrian training centre at Shooters Hill. There will hopefully be increased participation in sports by residents.

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ID	**First Name**	**Surname**	**Organisation**	**First name**	**surname**	**Organsiation**	**Vision (Refer to section 2.1) - Question 4: Do you have any comments on the vision for the Borough?**	**Council Response**
DCS84	Anna	Townend	Greenwich Environment Forum				It emphasises growth rather than limits to growth and regeneration and revival of the heritage for the Borough (including conservation areas) maintaining the now acknowledged but not protected built heritage (look at Woolwich!) and Greenwich Riverside where developers have been encouraged.	Comments noted, no change to vision required.
DCS45	Peter	Rice					well detailed	Support welcomed
DCS60	Lawrence	Smith	Westcombe Society				WS strongly supports 2.1.5 and 2.1.8. We would extend this to include the aim of achieving an overall reduction in traffic levels. This would contribute to reducing carbon emissions and local pollution. It would also reduce congestion and therefore, along with an improved transport infrastructure, would improve connectivity within the borough. WS also supports 2.1.6 but feel that more consideration needs to be given to creating job opportunities in lower skilled employment for those already living in the borough. Those mentioned require a relatively high level of skills and education. WS supports 2.1.7 but we feel that this should also include reference to youth leisure facilities which we feel are vital.	Support noted. Due to the projected increase in population it is unrealistic that there will be an overall reduction in traffic levels. The vision refers to the fact that almost all jobs now require a higher level of skills than in the past. It is important that the borough's residents have the skills and training necessary to meet the future employment demands. Youth Facilities are covered in the support text for policy CH1.
DCS85	Frank	King					Firstly my personal Vision for Greenwich is balance and self sufficiency. That, in 50 years time, Greenwich will be the leader in Waste Management and maintain a balanced community with sufficient housing, industrial and service businesses to employ most of the local population, with the River being used to its fullest possible extent, and being a feature of the Borough. I do not want Greenwich to become a dormitory town for the rest of London; I therefore do not support the London Plan requirements for the building of far too many houses in too short a period as planned. New Housing is needed, but this should be a more gradual development which is designed primarily to house our local population and reduce our own housing lists before allowing an influx of newcomers and destroying the very nature of the Borough and should be distributed evenly over the Borough, not packed into a small area at the Northern end of the Borough. We do not have, nor will ever have the infrastructure, to support such as massive rise in population as planned, especially in the North of the Borough where all of the Roads and Public Transport services are already overloaded, not to mention the Medical Services and Schools which are woefully inadequate already, and will not be able to grow to support these developments. 2.1.1. This paragraph is pure fantasy. The proposed developments will overwhelm the already overstretched Roads in the North of the Borough. There is simply no space to provide enough road space from Woolwich Ferry to Creek Road to support these developments. The only possible solution would be to make this whole area car-free, and this is impossible. If past experience is anything to go by Shops, Doctors, Dentists and Schools will be, where they are provided at all, in the wrong place and not provided until it is far too late to work them into the community. I am sorry to "bang-on" about this, but history shows us that forced building of urban conurbations in already overcrowded areas never works. 2.l. 9. I am also very concerned about the Mayor of London gaining control over Greenwich Park. This should remain under the purview of the G.B.C. We will have little or no control over it in the future and if, as I suspect, the Mayor decides that he wants to have many paying events in the Park, this would destroy the very nature of the Park in time and the Council will be powerless to intervene. 2 .1.10. I am very anti the Olympic Games in England at all (and always have been), so I will try not to comment on any matters relating to this farce either here or in the rest of my comments. 2.1.12. I really do hope that this is true! 2.2.l. Ditto. Footnote: It is very bad form to describe Greenwich as a Royal Borough until the title has actually been conferred upon it. This will not be the case for over 18 months. In the meantime the title should not be used. Sorry to be so	The Borough's housing target is set out in the London Plan. The Core Strategy sets out the range of infrastructure that will be delivered to support the housing growth and further support text has been added to IM1 stating that infrastructure should be provided prior to the completion of the development. The Core Strategy will not be adopted until late 2013 and therefore uses the term 'Royal Borough' to reflect the situation at the time of adoption.

	Consultee			Agent				
ID	**First Name**	**Surname**	**Organisation**	**First name**	**surname**	**Organsiation**	**Vision (Refer to section 2.1) - Question 4: Do you have any comments on the vision for the Borough?**	**Council Response**
							negative in this section; I will try my best to be positive from now on!!!	
DCS52			Greenwich Hospital	Neil	Lucas	Drivers Jonas Deloitte	Greenwich Hospital broadly supports the Council's overarching Spatial Vision for the Borough. Greenwich Hospital supports the emphasis placed on maintaining the role of West Greenwich and the Maritime Greenwich World Heritage Site as a key centre for tourism, with its new hotel on King William Walk helping to deliver this Vision. Furthermore, Greenwich Hospital supports the emphasis on the protection and enhancement of Greenwich's rich historic heritage and the consideration given to new development which will provide high quality architecture and urban design to achieve an enhanced and more sustainable urban environment.	Support noted
DCS47			Tesco Stores Ltd		Russell	Nathaniel Lichfield & Partners Ltd	Support for growth of Woolwich Town Centre through new development and a mix of town centres uses to become a Metropolitan Centre and for the recognition of jobs, particularly retail jobs, continuing to be one of the key sectors where the majority of new jobs are provided. Support is also given to the utilising the benefits of public transport improvements through Cross Rail in the Borough by supporting development proposals at Cross Rail sites.	Support noted
DCS90	Mrs	Abraham	Mansoor				Always carry a research first so that nobody can blame the borough Council in the future. It is an expensive way in which you have done it. Public money is very useful for useful thing to make people's life better. But will it?	Comment noted, no action required

Question 5 – Strategic Objectives – Do you have any comments on the objectives?

	Consultee			Agent				
ID	**First Name**	**Surname**	**Organisation**	**Agent's First name**	**Agents Surname**	**Agent**	**Strategic Objectives (Refer to section 2.3) - Question 5: Do you have any comments on the objectives?**	**Council response**
DCS4	Lucy	Owen	Port of London Authority				Strategic Objective C makes reference to increasing use of the River. This reference is welcomed and supported and as the Council will be aware, the use of the river for the transport of people and freight is a sustainable method of transport which has policy support from the National level downwards. There does however seem to be very few references after this point in the document to the existing river piers and to their protection and enhancement or to the Council's support for new river piers.	Reference to protecting and enhancing existing river bus services and piers has been added to policy IM3. Also, this policy refers to the Council's support for a new pier at Thamesmead.
DCS25		Waite					They are admirable but are unlikely to be achievable in full. The Olympic legacy has been watered down; and the benefits culture is in danger of becoming ingrained, so that some residents are sunk into inertia.	Comments noted but no change required
DCS32	Nicolas	Long					I agree with the objectives but am concerned that the goal of making developments match and enhance Greenwich's heritage are not being met in the recent developments along Creek Road and Greenwich High Road. Much is just bland utilitarian functional design that has no character at all. Similarly, I find many of the buildings in Greenwich town centre to be in a state of neglect and decay	Comments noted. It is important that development is designed so that it enhances the area in which it is located and it is the Council's intention for the policies of the Core Strategy to achieve this throughout the borough, including the Creekside area in Greenwich.
DCS33	Caroline	Evans					Section 2.3.1 gives two strategic objectives that are excellent and important. 'To protect and enhance Greenwich's rich natural and built heritage' and 'to promote high quality architecture and urban design in all developments in Greenwich' However, these objectives have not been reflected in past or recent developments in Greenwich. Recent developments that are disappointing are at Creekside and on Greenwich High Road. How can we be sure that these objectives will be respected and realised in future?	Support for the objectives is noted. It is important that development is designed so that it enhances the area in which it is located and it is the Council's intention for the policies of the Core Strategy to achieve this throughout the borough, including the Creekside area in Greenwich.
DCS38	Metropolitan Police Authority		Metropolitan Police Authority	Brian	Coughlan	CGMS Consulting	2.3.1 Strategic Objectives Subsection (l) promotes high quality architecture and urban design which contributes to people feeling safe and reduces opportunity for crime. This wording is strongly welcomed by the MPA/S.	Support noted
DCS40	Clare	Kemsley					I live on Greenwich High Road and feel strongly that there should be appropriate detailed long-term plans for the area's development. In particular, we need a supplementary planning document for the immediate area. I make particular reference to the two strategic objectives of the Draft Core Strategy: * 'to protect and enhance Greenwich's rich natural and built heritage' * 'to promote high quality architecture and urban design in all developments in Greenwich'. It's important that Greenwich High Road sees effective implementation of these objectives. A lot of piecemeal development has already happened or been planned, and I don't think that it all meets these criteria. However, we should not assume that it's too late to implement more appropriate planning. Immediate steps should be taken to make sure any further development is planned and controlled with a supplementary planning document or equivalent neighbourhood plan. The architectural character of the area should be	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

							improved (or maintained where appropriate), rather than worsened by development. And it must have a positive impact on the experience of current and future residents. I am keen to continue living on Greenwich High Road and I hope that new developments retain what's good about the area, and make real improvements where necessary. However, we can't rely on piecemeal planning to achieve this. I have strong concerns that without appropriate long-term planning, it may deteriorate as a residential area rather than improve. I hope the council is able to ensure that a supplementary planning document is produced for our area.	
DCS42			Greenwich Peninsula Regeneration Ltd	James	Wickham	Gerald Eve	A further strategic objective should be added to specifically encourage the delivery of major regeneration schemes in the Borough. We suggest the following additional text: 'To encourage and actively support the delivery of major sustainable regeneration projects within the borough. Themes We support the two themes on which the spatial strategy is based. In particular the theme of 'Growing Greenwich', including the recognition that major changes require encouragement and enablement.	An objective to encourage major regeneration schemes has been added to the Core Strategy (objective M).
DCS43	Barbara	Reid					Section 2.3.1 gives two strategic objectives that don't appear to have been met in relation to developments that are local to Creekside and Greenwich High Road. These are 'to protect and enhance Greenwich's rich natural and built heritage' and 'to promote high quality architecture and urban design in all developments in Greenwich'.	Noted
DCS46	Susan	Proudfoot					All are commendable but none refers to educational part of the vision (2.1.7) (unless it is buried in J)	Objective J covers a wide range of infrastructure including education and Objective K talks of improving skills.
DCS84	Anna	Townend	Greenwich Environment Forum				Already given. Strengthen quality schooling no (post ILEA) the Borough is responsible largely for this	Comment noted
DCS45	Peter	Rice					Agreed 2.3.1 C, K - dependant on outside bodies / agencies	Support noted and it is agreed that not all of the objectives are solely the responsibility of the Council.
DCS77	Geoffrey	Belcher	Maritime Greenwich World Heritage Site				2.3 Strategic Objectives Objective G 'To protect and enhance Greenwich's natural and built heritage' is welcomed	Support noted

DCS60	Lawrence	Smith	Westcombe Society				WS supports cross river links in particular because they would improve access to employment in neighbouring boroughs. However, any vehicular river crossing should be consistent with the overall plan to reduce traffic levels. WS is also concerned that river crossings for pedestrians and cyclists are affordable.	Support noted
DCS85	Frank	King					2.3.1. A): I do not believe that the last part of the sentence "focusing primarily in the waterfront area" Enhances Greenwich at all. I believe this to be a wrong decision. 2.3.1. B): I hope that this will be true 2.3.l. C): I certainly agree with this objective, in particular, "enhancing the North/South transport links" and "increasing) the use of the river", but it will be difficult to increase the use of the river if you build houses along the waterfront. 2.1.3. D, E, F & G): I wholeheartedly agree with these objectives. 2.l.3. H): I do not wish to comment on this farce. 2.1.3. I, J, K & L): I wholeheartedly agree with these objectives.	Support noted. The locations for growth reflect the opportunity areas as identified in the London Plan. The larger proportion of brownfield land in the north of the borough makes it the preferable area for new development and regeneration schemes.
DCS80	Janet	Goulton	London City Airport Limited				1. London City Airport supports the broad goals and objectives of the Draft Core Strategy to build on the success of Greenwich as a great place to live, work and visit.	Support noted
DCS47			Tesco Stores Ltd		Russell	Nathaniel Lichfield & Partners Ltd	Support the revitalisation of Woolwich, a high level of growth sought in the Borough, the encouragement of a prosperous economy and support for the Borough's town centre networks, particularly Woolwich.	Support noted
DCS81	Linda	Hodgson	Heathway Residents Association				p33 E) We propose that a second tick be added against low and zero carbon developments also p34 G) This paragraph should be updated to emphasise also the relationship between natural and built heritage	A second tick has been added to Objective E. No change is required to Objective G.
DCS90	Mrs	Abraham	Mansoor				The Borough Council need to consult residents first in anything in the future before wasting good public money which you are doing in Woolwich at the moment. The pavement was Ok. Why renovate it? Washing good money down the drain.	No action required

Question 6 – Spatial Strategy – Do you have any comments on the Spatial Strategy?

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
DCS4	Lucy	Owen	Port of London Authority				The Places of Greenwich: The text within the Places of Greenwich section of the document needs to be reviewed for consistency. For example, within Charlton reference is made to the Aggregates Zone and to Angerstein and Murphy's Wharves. Whilst this reference is welcomed, it would be useful to add to the text the fact that they are safeguarded wharves. If reference is made to Angerstein and Murphy's wharves, then reference should also be made to the other safeguarded wharves within the plan area (Brewery Wharf, Tunnel Glucose, Victoria Deep Water Terminal and Riverside Wharf). Additionally, if reference is made to the Woolwich ferry, for consistency reference should be made to the river bus piers which are located within the plan area (QE2 pier, Woolwich Arsenal Pier, Greenwich Pier). It may also be beneficial to refer to the PLA's facility which is located at Barrier Gardens Pier. The inclusion of the protection of safeguarded wharves in the list of things that the Council cannot change is welcomed. Key features of the Proposed Strategy: The key features of the proposed strategy include a new mixed use quarter at Charlton Riverside and a new mixed use urban quarter at Greenwich Peninsula West involving the release of industrial land. It is not made clear in the text that the Borough's safeguarded wharves would continue to be protected for cargo handling uses in line with Policy 4C.9 of the London Plan and that any development next to or opposite the safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance. Charlton Riverside, including map 1 and Policy EA2: The PLA welcomes the reference at 3.3.12 to the strategic development location at Charlton Riverside excluding the safeguarded Angerstein and Murphy's Wharves and this is shown on map 1. Whilst this reference is welcomed, it is questioned why Riverside Wharf is also not included in the exclusion. As a safeguarded wharf, Riverside Wharf should be excluded from the strategic development location and the text and map 1 updated accordingly. It should be made clear in policy EA2	Para 3.3.12 refers to the "safeguarded Angerstein's and Murphy's Wharves". Para 3.1.2 refers to protecting safeguarded wharves IM5 now lists all the safeguarded wharves. Paragraph 3.3.12 has been amended to state "The SDL will **include the safeguarded Riverside Wharf but will** exclude … the current Aggregate Zone, the safeguarded Angerstein's and Murphy's Wharves" Paragraph 3.3.25 now states "**This area contains the safeguarded Tunnel Glucose Wharf."** Victoria Deep Water Terminal is not within the one of the Locations for Strategic Development and is therefore not mentioned in this section. There is no reference to the Woolwich Ferry in this section. Policy IM3 supports use of river for transport purposes – It is not considered necessary or appropriate to list the piers or the PLA's facility. NOTED Para 4.2.12 in supporting text to Policy EA3 states that safeguarded wharf at Greenwich Peninsula West is safeguarded for river-based cargo. Para 3.3.12 clarifies that Angerstein and Murphy's safeguarded wharves are excluded from the Charlton Riverside. It is not necessary to add this point into "Key Features Box" There is no need to repeat Policy 7.26 of the London Plan. It is not considered necessary to amend

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
							that the safeguarded wharves are excluded from the strategic development location and that development next to or opposite the safeguarded wharves needs to be designed to minimise the potential for conflicts of use and disturbance in line with Policy 4C.9 of the London Plan.	EA2 as proposed as this is addrwestcombessed in Para 3.3.12. There is no need to repeat Policy 7.26 of the London Plan
							Greenwich Peninsula, including Policy EA3: Greenwich Peninsula is to be the focus of the majority of the development in the Borough over the Plan period and whilst there is no objection in principle to this, it needs to be made clear that there are safeguarded wharves located on the peninsula which are excluded from the strategic development location. Furthermore, it should be made clear that development next to or opposite the safeguarded wharves needs to be designed to minimise the potential for conflicts of use and disturbance in line with Policy 4C.9 of the London Plan. As the Council will be aware, concerns continue to be raised about residential development on certain parts of the Peninsula and the levels of noise, air quality and lighting that new residents on the Peninsula would experience as a result of the cargo handling operations that currently and could reasonably be expected to take place on the safeguarded wharves in the future.	Para 4.2.12 states that the area contains a safeguarded wharf which is safeguarded for river-based cargo handling.
							At Greenwich Peninsula West the PLA has been working closely with the developer of Enderby Wharf concerning their proposed development. As the Council will be aware, the site is located in very close proximity to Tunnel Glucose, a safeguarded wharf and it questioned why Tunnel Glucose has not been excluded from Greenwich Peninsula West Strategic Development Location. The PLA would assert that as a safeguarded wharf which is protected by policy 4C.9 of the London Plan for cargo handling uses that it should be removed from the strategic development location on map 2. This exclusion should also be made clear in policy EA3 and the supporting text. It should be made clear in the text relating to Enderby Wharf that any development on the Enderby Wharf site needs to be designed to minimise the potential for conflicts of use and disturbance with the safeguarded wharf. There is a cross reference to policy EA(b) and the PLA's comments on this policy are provided later in this document.	There is no need to repeat Policy 7.26 of the London Plan –
							Greenwich Riverside: It should be made clear in relation to Greenwich Riverside that there is a boat yard currently located at Piper's Wharf and that this will be re-located to Bay Wharf as part of the development of the site. The PLA would wish to be involved in any discussions concerning any proposed rowing club.	These matters are considered too detailed to be included.
							Creekside: The reference to Brewery Wharf being safeguarded is welcomed. It should be made clear that it is protected for cargo handling uses and that development next to or opposite the safeguarded wharf needs to be designed to minimise the potential for conflicts of use and disturbance in line with Policy 4C.9 of the	NOTED

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
							London Plan. Thamesmead: This is the only riverside location where reference is made to river bus services. The Core Strategy seeks to support a ferry service in this location and a new pier. Early discussions will be needed with the PLA to ensure that anything that is proposed is acceptable in navigational, river regime and environmental terms. Key Diagram: The Borough's safeguarded wharves should be included on the key diagram.	NOTED – no change is required This is not considered to be necessary as all safeguarded wharves are shown on the Proposals Map.
DCS9	Paul	Webbewood					There is no evidence to support the claim at para 3.2.3 that the two proposed strategic development locations at Greenwich Peninsula and Charlton comprise underused industrial land. The fact that many of the industrial buildings are necessarily low rise does not constitute an underuse of the site.	A full employment land review, including a review of industrial land uses shall be published alongside the Core Strategy.
DCS10			CIS Ltd				Co-Operative Insurance Society Ltd (CIS Ltd) are the freehold owner of the 25 acre Westminster Industrial Estate which is located adjacent to the Thames Barrier within Charlton Riverside. The majority of the 60 units are in light industrial use with others being used for storage, workshops and office use. The property forms part of a £2.5bn property portfolio which is managed by AXA Real Estate Managers on behalf of the CIS. We support the proposal for mixed use development at Charlton Riverside (para 3.2.3). However should the infrastructure needed to enable 6000 homes not be forthcoming in the foreseeable future, we consider that more modest proposals for redevelopment should be proceeded with. We support the creation of either an area action plan or an opportunity area planning framework (see paras 3.3.11 - 13) and would be pleased to work with the Council and other landowners on this as it emerges. However given the long lead time for plan making, especially statutory plan making, we would be concerned if preparation of the plan was to be regarded as placing any moratorium on development in the meantime. An informal communication from the Council suggests that the preparation of the area action plan would not start until after adoption of the Core Strategy in 2012. We consider that the area planning process could run in parallel with the later stages of the Core Strategy. We would also suggest that an OAPF would be a quicker route and more in keeping with the approach taken elsewhere. The Council	NOTED This scenario forms part of the reasonable alternative spatial strategy that was consulted upon. This option would reduce the opportunity to create a sustainable mixed use community at Charlton Riverside and would not address the amount of under-used employment land. NOTED. However, the adopted Charlton Riverside Master Plan SPD now guides development in the area. NOTED.

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
							may be able to call on additional resources from the private sector and presumably from the GLA to support this process. The general desirability of ensuring a flow of completions starting in 2016 (see para 3.3.14) reinforces our view that the need for a flexible approach is essential to avoid unnecessary delays. Given the brownfield nature of the site and the need for a number of demolitions, there will be a fair amount of preparatory work before any construction can start. The complexities of land ownership could militate against comprehensive redevelopment, and that a flexible scheme allowing different areas to develop at different times within an overall design and transport framework, with appropriate means for the collection of developer contributions, would be preferable to an overarching and rigid plan which may take some time to emerge. We consider that it should be possible to establish early on where there are critical interrelationships between different parts which need highlighting and maintaining and that these can guide future decisions.	
DCS13	David	Kerr					I strongly support the theme that major projects should not be considered without parallel contemporaneous consideration of supporting infrastructure. Unfortunately the draft does not state that projects will not proceed if funding is not found for essential infrastructure and therefore the strategy does not inspire confidence. For example, the draft does not make clear how primary school shortfall in the north of the borough is to be corrected let alone reversed to cope with the population growth and also with the pressures that will flow from over 32,000 new homes. The draft is similarly weak about the provision of medical facilities.	Section 4.8 of the Draft Core Strategy addresses infrastructure, particularly Policy IM1. Policy CH1 is also relevant. The Draft Core Strategy also highlights the existing Planning Obligations SPD and the preparation of an Infrastructure Delivery Plan which informs subsequent versions of the Core Strategy.
DCS19			Morden College Trust				SEE QUESTION 18 RESPONSE FOR COMMENTS	
DCS20	Mick	Delap					I am a resident of the Ashburnham Triangle, and live close to Greenwich High Road and the adjoining area of Deptford Creek. I have read the Draft Core Strategy with interest, and agree with its broad thrust. I am using this opportunity to expand my views, focussing on neighbourhood needs over the period of the Core Strategy. In the Draft Core Strategy, the Ashburnham Triangle and Deptford Creek are included in the much larger area of West Greenwich, and attract minimal specific attention, beyond acknowledgement that the Creek is at the heart of Opportunity Area 7 in the London Authority's London Plan. Both the London Plan and the Draft Core Strategy characterise the Creek / Riverside area of Opportunity Area 7 as having potential for the development of a cluster of creative and cultural industries (Draft Core Strategy 3.3.29), with the Core strategy referring to the Creekside Strategic Development Location. Both documents also mention the considerable potential for regeneration. However, there is no attempt in the Draft Core Strategy to explain how the opportunities recognised in the London Plan will be realised.	These areas form part of the 'Greenwich and Blackheath' area. Further information is provided in paragraph 3.3.33. Para 3.3.34 states that this is an area undergoing considerable change with a number of sites having the benefit of planning permission.

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
							Nor is there any considered recognition of the scale and rapidity of recent, current, planned and potential change along both sides of the Creek, and into Norman Road, Greenwich High Road, and the south west corner of the Ashburnham Triangle Conservation Area: approx. 3500 new units either already building or planned, with an estimated new population of some eight thousand. And more almost certain to come in the period 2012 to 2015 (see Appendix). The successful development of Opportunity Area 7 is further complicated by the fact that the Creek is under the jurisdiction of two different boroughs, Greenwich and Lewisham. The London Plan, unlike the Draft Core Strategy, does acknowledge that achieving the Strategic Priorities for South East London, including optimising the development of Opportunity Areas ....is likely to give rise to substantial planning obligations (5.D1). And it includes in its list of Strategic Priorities for SE London the need to ensure that new housing provision is complemented by adequate social and other infrastructure, and is integrated into the broader life of the sub-region. So far, there has been no communication by Greenwich of how it proposes to meet the planning obligations which current and planned development of this part of West Greenwich have already given rise to. Nor does the Draft Core Strategy give any indication that this lack will be met in the future. As a resident of the Ashburnham Triangle, I believe that there is now an urgent need to replace the current haphazard and piecemeal approach to the development of this extreme western edge of the Borough with a Supplementary Planning Document, or some other kind of neighbourhood plan. An SPD will enable Greenwich to consult with Lewisham in setting out a coherent approach both to new housing developments, and to their merging with existing residential areas in a cohesive, healthy, and properly planned and resourced Creekside / Opportunity Area 7 / Greenwich High Road community, to the west of Greenwich Town Centre. This is the basic minimum if Greenwich is to live up to the planning obligations described in the London Plan. We believe the lack of a commitment to a local planning document in the Core Strategy will mean that none of the potential of Opportunity Area 7 is realised. If both new and old residents of this part of Greenwich are to avoid continued uncertainty and declining amenities, we urge that the Core Strategy includes a commitment to developing an SPD for this area. APPENDIX. Opportunity Area 7 is somewhat vaguely defined in the current planning documents. It includes Deptford Creek (both sides) up to the A2, and the large developments towards the mouth of the Creek (Greenwich Reach East and Creekside Village West). As far as Greenwich Planning is concerned, on the east side of the Creek, along Norman Road, the re-development of the Haddo Estate is complete, and there are advanced plans to develop Hilton and Norman Wharfs. Along Greenwich High Road building is advanced at 43 -81, and has commenced at the Binnie Court site opposite.	Policy IM1 Infrastructure addresses the use of planning obligations. Further detail will be provided in the Infrastructure Delivery Plan to be published alongside the submission version Core Strategy. No further detail is considered to be necessary. Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
							There is planning permission for 39, the Former Filling Station. And, where the Creek and Norman Road reach the A2, the Deal's Gateway development is building. At a rough estimate, we are talking of some 3,500 new units either building or approved. Providing the current residential population of this part of West Greenwich, and the 8,000 newcomers, with a planned infrastructure that will deliver school places, health provision, green spaces, and all the other elements of a healthy and cohesive community is already a major challenge. It will not be met without a specific and transparent local planning exercise. Creating an SPD is the essential starting point. The case for an SPD is further strengthened when it is realised how much more development remains to be planned, after 2011. Lewisham will have its own longer term plans for the Creek, and its massive Lethbridge re-development nearby will swell the local population. Within Greenwich, beyond already agreed planning applications, there are major opportunities remaining along Norman Road between Hilton Wharf and Norman House (whose own future in the current economic climate cannot be secure). The Thames Water site contains significant areas of unexploited land, both on the Creek, and on Greenwich High Road. The Creekside warehouse area behind 39 the High Road represents another significant development opportunity. At the head of the Creek, where the High Road meets the A2, the future of both the Lewisham College site and the older houses along the A2 (41 - 49) and 1- 21 the High Road are uncertain. And, opposite Deal's Gateway, there is a significant area of major potential for regeneration at the south west corner of the Ashburnham Triangle Conservation area, running from the A2, High Road junction along the A2 and into Catherine Grove (especially the warehouse at 44 Catherine Grove, plus Maurice Drummond House, and the extensive car park space behind the Magistrates Court and the former school annexe). Given that no pre-planning discussion has started for these sites, it is most unlikely any of them will be given planning permission before 2012. It therefore seems vital that the Core Strategy ensures that their development is set into a detailed local planning context for the Opportunity Area. Without an SPD, or some other neighbourhood plan, it is difficult to see how such a context can be provided.	
DCS21	Carmelle	Bell	Thames Water Plc				Paragraphs 3.2.23 to 3.2.25 - Critical Infrastructure Thames Water submitted representations regarding the preparation of the Infrastructure Delivery Plan in December 2010. Further comments on water and sewerage infrastructure provision are provided in relation to Policy C1 below. In relation to paragraph 3.2.23 it is critical to recognise that water and sewerage infrastructure needs to be in place ahead of occupation of development 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.	Para 3.2.23 concerns all types of critical infrastructure and states that new infrastructure needs to either precede or accompany development. It is considered to be unnecessarily detailed to add that water and sewerage must precede occupation as this can be dealt with through conditions on any planning applications.

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
DCS23	Nigel	Abbott	Cluttons LLP				In relation to paragraph 3.3.29, on behalf of our clients, Halliard Property Co Limited we wish to support the general policy approach of mixed use regeneration of Creekside as this will build upon the achievements secured to date. We consider that our client's site at Phoenix Wharf in Lower Norman Road, which lies within Creekside is suitable to be designated for residential led mixed use redevelopment with an element of employment floorspace provision. The existing site is currently used as builder's merchants and provides comparatively little employment. Furthermore, the site is under-used with only single storey buildings and open storage that do not contribute positively to the surrounding townscape. The site provides an exciting opportunity for the provision of high quality, higher density, multi-storey mixed use redevelopment to complement the existing and permitted schemes located elsewhere within Deptford Creekside. Any scheme that is proposed would be able to provide enhanced employment potential compared to the existing low density builder's yard use. We are aware that in the West Greenwich Development Framework, published by the Council in April 2000, the site is included under Area A (Lower Norman Road) where it is stated that residential development is not acceptable. However, the saved policies of current adopted UDP (adopted July 2006), which post-dates the Development Framework, allocates the site for light industrial / small business units / office purposes under proposal J7. The description for proposal J7 recognises that in the longer term there may be scope for comprehensive redevelopment around Greenwich Station whereupon this site may have scope for more intensive mixed use and residential use'. Since then, the New Haddo Estate has been comprehensively redeveloped with a residential led mixed use scheme and there have been recent resolutions to grant consent for two adjoining proposals at Hilton's Wharf for mixed use residential led mixed use schemes. With these further schemes having received planning permission already, the conditions laid down in proposal J7 for longer term mixed use and residential use' have been met. Furthermore, the Council has acknowledged that the Deptford Creek and Greenwich Riverside are one of the five Opportunity Areas identified in both the published London Plan, and the Draft Replacement London Plan which are major reservoirs of brownfield land with significant potential to accommodate new housing, commercial and other development.	NOTED This is a Site Specific response, too detailed for consideration in the Core Strategy and Development Management Policy document. Comments on the forthcoming Site Allocations Document would be welcomed.

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ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
DCS24	John	Franklin	Greenwich Society				We have no comments on the general strategy except to say that we favour this over the Reasonable Alternative Strategy (3.4.2), retaining the industrial land at Greenwich Peninsula West north of Enderby Wharf. We note that the completion of the Thames Path, though included in the 'vision' for 2027 (2.1.8), is nowhere mentioned in this strategy' section. It is an important element in improved infrastructure, as a route for walkers and cyclists to avoid the heavy traffic and pollution elsewhere in the Borough. Its completion and improvement will not be easy to achieve, given the requirement to protect safeguarded wharves (3.1.5) and the need to cross other obstacles such as Deptford Creek. There is only a later tentative reference to the Charlton/Woolwich gaps under Policy C4 Sustainable Travel (4.8.23), and nothing under Management Policies (5.8). It should appear as a key infrastructure feature, along with the package of new river crossings', in the Proposed Spatial Strategy (3.2.3) and in 3.2.24. General comments on Strategic Policies This section necessarily discusses housing targets, design quality and infrastructure under separate headings, and our comments below reflect that. But it seems to us that they are intimately related, and need to be approached within a coherent policy framework. The Borough faces a demanding target for new housing (the second highest in London). This will require large dense developments, which will place new demands on infrastructure (transport, electricity, telecoms, water, sewage, schools, healthcare, provision for the elderly and community services). The objective to raise the proportion of dwellings with 3+ bedrooms will further increase this demand. It is the Council's responsibility to ensure that the demand for all kinds of infrastructure is adequately met. The draft strategy document refers to this issue but merely says that an Infrastructure Delivery Plan is being prepared to establish a comprehensive understanding of the infrastructure requirements and work with partners to identify how and when it will be provided (6.1.18).In our view this is not good enough the timely provision of adequate infrastructure should be an integral part of the Core Strategy, and a delivery plan, at least in outline, must be included in the strategy document, not merely shelved for later consideration. The problem, of course, is funding. Some of the utilities can be expected to fund their own investment, and the Council's responsibility is only to ensure that they are fully informed of prospective demand well in advance and that they provide the necessary infrastructure in good time. But the funding of new transport (beyond what TfL can offer) and social requirements falls essentially to the Council and developers. In favourable economic circumstances it has been possible to look to developers to meet these requirements in S.106 agreements, and the Council will no	NOTED Policy IM4 refers to safeguarding existing footpaths including the Thames Path, and states that developments along the riverside should ensure that they incorporate provision for a riverside walkway / contribute to improvements. However, it is considered that further mention should be made. Para 3.2.24 has been amended to state "New transport infrastructure will include **a completed Thames Path,** improved links along the riverside…" The Key Features section has been amended to state **"**Infrastructure will be provided……including a package of new river crossings **and the completion of the Thames Path"** Policy IM1 addresses infrastructure requirements and Section 6 of the document addresses delivery of the Core Strategy. More detail of infrastructure requirements in the Borough is provided in the Infrastructure Delivery Plan, which has been prepared in conjunction with a range of stakeholders.

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ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
							doubt continue to seek maximum funding from this source and the Community Infrastructure Levy (Policy C1). But such favourable conditions are unlikely to return soon, and the first call on developer funding will be to meet the large (35%) requirement for affordable housing. The requirement for higher building standards (which we welcome) will further reduce the amount of available funding. At present the draft strategy ignores this fundamental problem (3.5.14-20 only discusses a possible shortfall in TfL funding). In the absence of other sources of Council funding (such as PFI) there would appear to be only three possibilities: 1. The housing target is met, but the infrastructure provided is less than adequate, storing up trouble for the future (transport congestion, estates with social problems). 2. The requirements for building quality and/or affordable housing are relaxed to make room for developers to provide more funds for infrastructure, resulting in poor-quality housing developments. 3. Developers are required to design schemes which reduce the requirement for infrastructure to a level which can be funded, for example by building at lower densities making it harder to reach the housing target. In this situation the Society strongly prefers the third option, which alone achieves a legacy of high-quality housing stock and infrastructure. We would like to see this priority reflected, at least in general terms, in the Council's core strategy. To achieve it will require careful, systematic planning of whole areas, rather than piecemeal individual developments. Something like this outcome is implied by the reasonable alternative to policy C1' mentioned in 4.8.24 for developments to have to provide all infrastructure requirements of the development prior to the completion of the development. This is said to need an assessment of the types of infrastructure required at different stages, but it is not clear why the approach is rejected (it was applied, for example, in requiring a pedestrian bridge over Deptford Creek before Greenwich Reach flats are sold).	The Infrastructure Delivery Plan is an important piece of evidence that has influenced the Core Strategy, and the key findings from this are reflected in the Core Strategy itself. It is not considered that it would be viable to require all development to provide all infrastructure prior to development, but where this is possible it should be achieved and this has now been added to the supporting text for Policy IM1.
DCS25		Waite					3.2.15) The location of any tall buildings in "Charlton Riverside" needs to preserve the view to/from St Luke's church and its traditional status as a navigation aid/point for river traffic. 3.3.10) Charlton itself should not be ignored (as it usually is). It could do with sprucing up as it has shabby shops and poor facilities. From additional comments section of questionnaire... LBG is in a difficult position being forced into accepting an appallingly high level of population growth, without adequate funding for projects. The Draft Core Strategy is written from the viewpoint that 'failure is not an option', whereas failure is a very strong possibility. Someone needs a big reality check, even though the Draft Core Strategy is	Protected views are set out in Policy DH(g). This is not a protected view, and as such, reference as suggested in the Strategy section is not appropriate. Para 3.3.10 has been amended to state "…character will be **retained and enhanced**…" as in 3.3.34 for Eltham and the South of the Borough. The Draft Core Strategy is predicated on a growth agenda; paragraph 3.1.2 outlines the national and regional parameters in which it has been prepared – specifically in this case, to provide a minimum of 25,950 new homes. Alternatives would not be found

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							only at the 'vision' stage, current financial cuts will impact for decades.	sound.
DCS26	Malcolm	Souch	NHS London Healthy Urban Development Unit (HUDU)				At present the proposed spatial strategy does not refer to the need to support new housing growth with new and enhanced healthcare facilities and services. Specific health infrastructure requirements should be identified in the Locations for Strategic Development, in particular in Charlton Riverside and Greenwich Peninsula West where new urban quarters and a significant amount of new housing is proposed. The Council is strongly encouraged to work with the PCT and other social infrastructure providers and commissioners to coordinate policies and strategies and identify specific requirements. The infrastructure delivery plan should identify sites and funding requirements and look at different ways of utilising assets and delivering new health infrastructure.	This is not considered appropriate for inclusion into the Strategy section of the Core Strategy document. Objective J addresses the need to ensure infrastructure is provided / enhanced to support growth – this includes health infrastructure. Policy IM1 supports the development of new and improved community facilities and Policy CH2 seeks to improve access to health facilities in the Borough. The adopted Master Plan SPD's for these areas will ensure that infrastructure is planned appropriately and is sufficient to meet the growth proposed. NOTED NOTED
DCS28	Andrew	Steeds	Ashburnham Triangle Association				This response is being made on behalf of the Ashburnham Triangle Association (ATA). Broadly, we welcome the attempt to provide some overarching strategy for the future development of the borough and we endorse the three principles on which it is built. Equally, we are glad to see that the unique characteristics of Greenwich' are identified as a key influence on the strategy document and that a key concern is 'protecting and enhancing the borough's environment'. The ATA is located in the Greenwich Riverside area identified in your strategy. As such we do not feel in a position to comment on the strategy as it applies to other areas of the borough except in so far as the recent history of redevelopment in our area may provide lessons for development elsewhere. In this respect, we feel that the piecemeal redevelopment of the north side of Greenwich High Road and proposals for Creekside renovation offer a perfect example of the deleterious effect of a lack of strategic thinking. Given the scale of present and future	NOTED Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have

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							developments in this cross-border area, we feel strongly that there is a crucial need for a supplementary planning document (SPD), or some other appropriate neighbourhood plan, to be developed in consort with Lewisham Council. The effect of piecemeal developments on the local community There is an assumption in this document that most of the decisions concerning redevelopments in our area have already been taken and fall outside the remit of this strategy document. Many have, it is true, but many other significant sites remain and we are disappointed not to see this acknowledged, or legislated for, in the document. Many of the developments that have already happened have resulted in the loss of much of the record of Greenwich's industrial past and its replacement with a dominant mixture of new hotels and mixed-source accommodation. We have repeatedly warned that these developments are being undertaken without due consideration of their impact on the 'existing residents' identified in the document as a core concern, and without evident calculation of their effect on the three types of infrastructure "physical, social and green" quoted in the document. To give just one example, the availability of places in local state schools, primary and secondary, is already an issue, with most of the streets in the ATA now falling outside the catchment area of schools that would have readily accommodated them even five years ago. To our knowledge, no new schools are being mooted, despite the exhibition's declaration that 'Infrastructure will be provided to support the proposed growth'. Given the increase in accommodation, it is a concern that full consideration does not appear to have been given to the capacity of current medical and educational provision, or to other aspects of social infrastructure.	planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage. More detail of infrastructure requirements in the Borough is provided in the Infrastructure Delivery Plan, which has been prepared in conjunction with a range of stakeholders. The Infrastructure Delivery Plan is an important piece of evidence that has influenced the Core Strategy, and the key findings from this are reflected in the Core Strategy itself to ensure that the appropriate infrastructure is delivered for the growth that is planned. This includes detail on the need for school places.
DCS29		Mayor of London	Greater London Authority				Non-conformity with London Plan. The borough of Greenwich is classified in the adopted Industrial Capacity SPG and the DRLP as being within the 'limited' category for industrial land release with an indicative benchmark of 15ha for the period 2006-2026. Recent evidence indicates that a total of 14.4 ha of industrial land has already been released in Greenwich 2006-2010 (source: URS/DTZ London Industrial Baseline, LDA/GLA 2010). The recent proposals at Enderby Wharf (3.6ha) would increase the level of release in Greenwich to 18ha, marginally above the 20 year benchmark. In the wider South-East sub-region consisting of the boroughs of Bexley, Bromley, Lewisham, Southwark and Greenwich, a total of 53.8ha has been released over the period 2006-2010. This lies well within the 2006-2026 benchmark of 146ha but there are already emerging proposals in other borough LDFs within the sub-region for a further 97ha of industrial land release (not including Greenwich) over the planning period which, when added to the 53.8ha already released, would exceed the sub-regional benchmark by about 5 ha. Taking these borough and sub-regional factors into account the supply-demand balance of industrial land to 2026 is becoming increasingly tight and suggests that further substantial releases in the borough to 2026 should be avoided. Whilst some consolidation of the Charlton	Following discussions with the GLA the boundaries of the Strategic Industrial Locations have ben revised.

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							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. As such the proposals in the draft core strategy to de-designate SIL at Chalton Riverside and Greenwich Peninsula West are not in general conformity with the London Plan or Draft Replacement London Plan. In addition the number of new homes proposed for Charlton Riverside are around 6,000 homes by 2031. This is a substantial increase on the minimum of 3,500 homes set out in the draft replacement London Plan and the core strategy sets out that this is predicated on substantial release of industrial land. 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. Greenwich Peninsula West is in the Strategic Cultural Area, Draft Replacement London Plan Map 4.2, that centres around the O2 and Greenwich Town Centre, as such the aspirations set out in the core strategy for complementary leisure uses are in line with the aspirations set out in the Draft Replacement London Plan. However the Draft Replacement London Plan sets out release of industrial land will need to be managed in a sub-regional context. 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 quantums 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. It should also be noted that the release of SIL and subsequent housing development impacts on the safeguarded Wharfs in both Charlton Riverside and Greenwich Peninsula West and should additional SIL release be agreed the impact on the safeguarded wharves will need to be seriously considered. The paragraph and policy box refer to substantial release of employment land in Charlton Riverside and release of employment land in Greenwich Peninsula West following release of Enderby Wharf there is very limited scope for release of industrial land in Greenwich to 2021 as indicated in monitoring (LDA Industrial Land Baseline 2010) against the borough and sub-regional benchmarks for industrial land release in the Industrial Capacity SPG. There may be scope for consolidation of SIL at Charlton, in particular where there are non-industrial uses present, but this should not represent a ˜substantial release' of industrial land as indicated in para 3.2.3. The GLA would welcome further discussions with Greenwich on this matter and to consider the outputs of strategic and local	

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							employment land reviews. The GLA would also welcome further discussions on the Alternative Spatial Strategy set out in paras 3.4.3 to 3.4.5 and how this might be developed further so that it does deal with vacant/under-used industrial land in a managed approach in line with LP policies 2A.10 and 3B.4. After para 3.1.9 there ought to be an additional paragraph, 3.1.10 identifying the Strategic Industrial Locations in the London Plan. The policy box (page 38) refers to 6,000 new homes at Charlton Riverside (compared to minimum 3,500 homes in the DRLP) and sets out that this is based upon 'substantial release' of industrial land. It is not clear whether an appropriate balance has been struck with regard to employment land and new homes in this location and the implications for industrial land release relative to the borough and sub-regional benchmarks for industrial land release in SPG. The sustainability appraisal box (page 39) makes no reference to the safeguarded wharves or the impact of the proposed de-designation of SIL on employment, industrial capacity or the continued operation of the wharves. With regard to the wharves, notwithstanding the fundamental objection to the loss of SIL, the designation of this large area of currently industrial land in Charlton Riverside as a Strategic Development Area promotes the likelihood of conflicting land uses in close proximity to safeguarded wharves of Angerstein, Murphy's and Riverside Wharves. In the case of Riverside Wharf, this is actually within the Strategic Development Area. The objection could be resolved from a wharf policy perspective if the text identified the need for land uses close to the wharves to be managed in such a way that conflicts were unlikely, for example by including buffering land uses, and if Riverside Wharf is removed from the Strategic Development Area. The proposal does not encourage the potential for any additional wharves or river dependent uses to be created. Again this should be referenced in the supporting text and expanded on in any Action Area Plan. The designation of this area of currently industrial land at Greenwich Peninsula West as a Strategic Development Area promotes the likelihood of conflicting land uses in close proximity to safeguarded wharves of Tunnel Glucose, and Victoria Deep Water Terminal and the soon to be operational Boatyard at Bay Wharf. In the case of Tunnel Glucose Wharf, this is actually within the Strategic Development Area. The objection could be resolved from a wharf policy perspective if the text identified the need for land uses close to the wharves to be managed in such a way that conflicts were unlikely, for example by including buffering land uses, and if Tunnel Glucose Wharf is removed from the Strategic Development Area. It is recognised that the previous operator of Tunnel Glucose has vacated the site, however the GLA is aware that there is demand for	

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							wharf facilities when made available at current industrial market values. The GLA has been clear in recent negotiations in relation to Enderby's Wharf that it does not foresee the release of Tunnel Glucose Wharf in the foreseeable future due to the known demand for such sites in London and their sustainable transport benefits. Enderby's Wharf proposals have been deliberately designed to minimise such conflicts with an operational wharf. Key Diagram Non-conformity with London Plan. 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. Support identification of North Greenwich as potential new District centre. Note that Canning Town in Newham is not a new District centre as illustrated (it is existing), but could be flagged as 'Development Area in Neighbouring borough'. Note the area OA14 ought to be shown to include Canary Wharf. Greenwich Peninsula Stratford is recognised in the LP2008 (and DRLP) as one of the capital's two strategic office centres beyond London and in the DRLP as a Strategic Development Centre with particular potential for office development. Office development at Greenwich Peninsula should not be promoted to the extent that it would prejudice the potential of Stratford to develop as a strategic office centre. TFL Following the Comprehensive Spending Review (CSR) it was announced that the central core of Crossrail i.e. the tunnelled section between Paddington and Liverpool Street is expected to be delivered by 2018. As yet however, no clarification has been given on the expected opening date of the Woolwich Station, but it is likely to be post 2018. This point should therefore be clarified, and amended in the other parts of the document as required.	
DCS32	Nicolas	Long					I support ATA's request for a SPD to give detail on future developments	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

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ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
DCS33	Caroline	Evans					The Draft London Plan identifies Deptford Creek/Greenwich Riverside as Opportunity Area 7 (OA7) and notes that this area overlaps with Lewisham. We are glad to see this stated in the document. However, if developments are to proceed here in line with the aspirations of the document as a whole, there is a need for a supplementary planning document (SPD), agreed with Lewisham, to ensure coherence for proposed developments and an accepted context in which they are to proceed. Section 3.2.23 mentions, again, that 'significant infrastructure improvements will need to be delivered that will grow and enhance Greenwich for both new and existing residents as well as visitors'. Again, we would say that this has not happened in OA7. It seems as if the writers of the document are aware of this, as they say later in this section (3.3.32) that 'Deptford Creek is experiencing considerable development pressure'.	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage. More detail of infrastructure requirements in the Borough is provided in the Infrastructure Delivery Plan, which has been prepared in conjunction with a range of stakeholders. The Infrastructure Delivery Plan is an important piece of evidence that has influenced the Core Strategy, and the key findings from this are reflected in the Core Strategy itself to ensure that the appropriate infrastructure is delivered for the growth that is planned.
DCS35	Clare	Kemsley					I am writing about the Greenwich Draft Core Strategy. I live on Greenwich High Road and feel strongly that there should be appropriate detailed long-term plans for the area's development. In particular, we need a supplementary planning document for the immediate area. I make particular reference to the two strategic objectives of the Draft Core Strategy: 'to protect and enhance Greenwich's rich natural and built heritage' 'to promote high quality architecture and urban design in all developments in Greenwich'. It's important that Greenwich High Road sees effective implementation of these objectives. A lot of piecemeal development has already happened or been planned, and I don't think that it all meets these criteria. However, we should not assume that it's too late to implement more appropriate planning. Immediate steps should be taken to make sure any further development is planned and controlled with a supplementary planning document or equivalent neighbourhood plan. The architectural character of the area should be improved (or maintained where appropriate), rather than worsened by development. And it must have a positive impact on the experience of current and future residents. I am keen to continue living on Greenwich High Road and I hope that new developments retain what's good about the area, and make real improvements where necessary. However, we can't rely on piecemeal planning to achieve this. I have strong concerns that without appropriate long-term planning, it may deteriorate as a residential area rather than improve. I hope the council is able to ensure that a supplementary planning document is produced for our area.	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
DCS37	Greenwich Wharf Ltd		Greenwich Wharf Ltd				We note that at para 3.3.1 it states that the sites in this section reflect the Borough's Opportunity Area and Intensification Area set out in the Draft London Plan. We are concerned however that it is not sufficiently clear that Greenwich Wharf falls within the Greenwich Peninsular Opportunity Area. This was confirmed in the 2006 Officer's Committee Report for the site and whilst it is a matter for the LPA to determine the precise boundary of the Opportunity Area we are not aware of any reason its status should have changed. Our concern stems form the key diagram at page 40 and that Section 3.3 identifies Greenwich Wharf as within the Greenwich Riverside character area rather than the Greenwich Peninsular area. We therefore request in light of the above that the key diagram is amended to clearly include Greenwich Wharf within the Greenwich Peninsular Opportunity Area, that the site is incorporated within the Greenwich Peninsular character area, and Section 3.3 makes its status more explicit. We also request that Table 3.4 is corrected to reflect that the permission at the site is full not outline and it was permitted in 2007 not 2006.	Opportunity Area boundaries are defined by the Local Authority, these have not yet been mapped. However, the **boundary of the Greenwich Peninsula West Strategic Development Location has been amended to include the Lovell's, Granite, Badcock and Piper's Wharf site.** Opportunity Area boundaries are defined by the Local Authority, these have not yet been mapped. The Key Diagram is not showing definite boundaries and as such, no amendment is considered to be necessary. NO CHANGE Table 3.4 has been amended accordingly.
DCS39	Linda	Pound					As a resident of Charlton I am responding to this consultation. I would wish the council: - to make a more realistic appraisal of the proposals outlined, in light of the current economic situation. As the document stands no reference is made to the likely impact of budgetary cuts; - to make a greater commitment to full consultation with residents in this area. Charlton Riverside is likely to have an immense impact on amenities, especially transport, in the parts of Charlton where I live, close to the station and the document merely suggests that the character of Charlton is maintained. It will in fact be necessary to protect and enhance this part of Charlton if we are not to suffer from the massive planned population increase on our doorstep; - to ensure a greater emphasis on monitoring and enforcement council decisions, particularly planning conditions and parking restrictions; to take more account of the possible deterioration of the environment, increased deprivation and isolation if housing density is allowed to continue to increase; - to protect and where possible increase the number of open spaces and community spaces, in order to increase the safety and wellbeing of users; - to consider more fully the accommodation requirements of older people and people with disabilities in the area; to make a commitment to improving and enhancing those areas that lack the services and facilities to become truly cohesive and health communities; - to develop firm proposals for secondary school provision in Charlton; and - to place a greater emphasis on attracting a wider range of businesses into the borough to increase opportunities for local people to broaden their skills base and effectively compete in a challenging employment market.	Para 3.3.10 has been amended to state the character of Charlton will be **retained and enhanced**…" as in 3.3.36 for Eltham and the South of the Borough. The Master Plan SPD for Charlton Riverside ensures that infrastructure is planned appropriately and is sufficient to meet the growth proposed. More detail of infrastructure requirements in the Borough is provided in the Infrastructure Delivery Plan, which has been prepared in conjunction with a range of stakeholders. The Infrastructure Delivery Plan is an important piece of evidence that has influenced the Core Strategy, and the key findings from this are reflected in the Core Strategy itself to ensure that the appropriate infrastructure is delivered for the growth that is planned.

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ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
DCS40	Clare	Kemsley					I live on Greenwich High Road and feel strongly that there should be appropriate detailed long-term plans for the area's development. In particular, we need a supplementary planning document for the immediate area. I make particular reference to the two strategic objectives of the Draft Core Strategy: 'to protect and enhance Greenwich's rich natural and built heritage' 'to promote high quality architecture and urban design in all developments in Greenwich'. It's important that Greenwich High Road sees effective implementation of these objectives. A lot of piecemeal development has already happened or been planned, and I don't think that it all meets these criteria. However, we should not assume that it's too late to implement more appropriate planning. Immediate steps should be taken to make sure any further development is planned and controlled with a supplementary planning document or equivalent neighbourhood plan. The architectural character of the area should be improved (or maintained where appropriate), rather than worsened by development. And it must have a positive impact on the experience of current and future residents. I am keen to continue living on Greenwich High Road and I hope that new developments retain what's good about the area, and make real improvements where necessary. However, we can't rely on piecemeal planning to achieve this. I have strong concerns that without appropriate long-term planning, it may deteriorate as a residential area rather than improve. I hope the council is able to ensure that a supplementary planning document is produced for our area.	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.
DCS42			Greenwich Peninsula Regeneration Ltd				We suggest it would be helpful to note at paragraph 3.1.9 that some of the Opportunity Areas and Intensification Areas include sites with extant planning permission which establish a baseline of permitted development, in terms of both distribution and scale. Where feasible and practicable, the Core Strategy should be seeking to guide development and growth of such areas beyond this extant baseline rather than constrain them to their existing parameters. Key features of the Proposed Strategy The Key Features referring to development at North Greenwich should recognise that the 14,000 new homes described will also be completed over the plan period and will equate to over half the Draft Replacement London Plan's housing target for the Borough for the 2011-2021 DRLP period. This Key Feature is of particular importance to the Borough and we therefore suggest it should be near the top of the list. It will be the single biggest change in the spatial make-up of the Borough over the plan period. Key diagram & proposals map changes (page 39) We note that North Greenwich is identified as a Proposed District Centre. We suggest that, in view of the very significant amount of existing and permitted floorspace for town centre uses at North Greenwich, it would be appropriate to give it a higher classification	Details of extant planning permissions are provided within the more detailed 'Locations for Strategic Development in Section 3.3. It is not considered necessary to duplicate this information in para 3.1.6 (which replaces 3.1.9) The Key Features already state that 32,235 new homes are to be provided and that 14,000 will be on Greenwich Peninsula. It is not considered necessary to explicitly state the proportion here. Para 3.3.17 states that development on Greenwich Peninsula is significant not just for Greenwich but for London as a whole. Para 3.3.17 states that Greenwich Peninsula is providing a significant proportion of the Borough's new housing. NO CHANGE

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							in the Borough's town centre hierarchy. This is entirely justified by comparison with the size of the Borough's two existing Major Centres, Woolwich and Eltham and with the Borough's other District Centres. Figure 1, below, illustrates the size of the emerging Centre at North Greenwich. It illustrates that, when the existing permitted development is complete, it will be by far the largest Centre in the Borough, in terms of overall retail and leisure floorspace, and will have an A1 retail offer of a similar scale and quantum to Woolwich. In view of the Centre's excellent transport links and its nationwide importance as the UK's, and arguably the world's, leading entertainment venue, it would seem appropriate to position the Centre higher up the Borough's hierarchy. We therefore suggest that North Greenwich be identified as a Future Major Centre, recognising that it will become a Major Centre when the permitted development now under construction is completed during the Plan period.	The permission for retail development at North Greenwich does not meet the figures required for designation as a Major centre as set out in annex 2 of the London Plan which states that Major centres generally contain over 50,000sqm of retail floorspace with a relatively high proportion of comparison goods relative to convenience goods. Changes to the retail hierarchy are made through the London Plan
							We note that the Borough's updated Retail Capacity Study, which forms part of the evidence base for the Draft Core Strategy, has not been released as part of the consultation. The floorspace figures for the existing centres shown in Figure 1 are therefore based on the London-wide Town Centre Health Checks 2006 Analysis (GLA, January 2007), Annex 3, Table 1. Floorspace figures for the Peninsula are those in the permitted Masterplan (reference 02/2903/O) and the subsequent revision to the permitted quantum of development within the Dome Waterfront (reference 08/0197/O). It does not include the further 63,640sqm of leisure, sports and entertainment use permitted by 02/2903/O in the Dome Arena (The O2) itself. In wider terms, we consider recognition of North Greenwich as a Major Centre would more suitably reflect its overall importance to the borough as a new centre for living, working, shopping and recreation. This would improve the soundness of the Core Strategy as it would better reflect the existing position.	The Retail Capacity Study has now been published.
							We support the identification of a boundary for the North Greenwich Centre on Map 5 of the Proposals Map Changes. However, we consider that it should be amended to reflect the proposed changes to the Peninsula Masterplan that are envisaged to accommodate the Greenwich - Silvertown cable car. An application for these changes is currently being considered by the Council (reference 10/3422/O) and anticipates redistributing some town centre type uses around the cable car base station, which would sit outside the Centre boundary. We have included an amended Centre boundary plan (marked blue and hatched on Plan J4324/CORESTRAT/1) to take this adjustment into account.	As planning application 10/3422/O has now been approved, the boundary shall be amended as proposed.
							We also support the identification of Greenwich Peninsula as a Strategic Development Location as shown on the Key Diagram and also at para 3.3.17 in the Greenwich Peninsula section. However, there is no map included in the Proposals Map changes booklet	It is agreed that the Greenwich Peninsula Strategic Development Location should be mapped. A new map shall be added.

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							which provides a boundary for this designation. We suggest one should be added. A suggested boundary is outlined in red on Plan J4324/CORESTRAT/1. Town Centres (3.2.11 â€“ 3.2.12) We suggest that paragraph 3.2.11 should include reference to North Greenwich as a Future Major Centre, with retail development being focused there in addition to Woolwich and Eltham. Greenwich Peninsula (3.1.16 - 3.3.24) We strongly support the acknowledgement at 3.3.16 that the Greenwich Peninsula will be the focus of the majority of development in the Borough over the plan period. However, as we have outlined elsewhere, support for the delivery of this critical development seems surprisingly muted when it is set against its integral importance to the overall spatial strategy. We also consider that the Greenwich Peninsula section should contain a strong, positive commitment from the Council to work with key stakeholders on the Peninsula to actively support, encourage and realise its prompt and timely delivery. As we have set out above, we support the allocation of the Peninsula as a Strategic Development Location but consider the proposals map should be updated accordingly, as is proposed for the Greenwich Peninsula West SDL. Table 3.3 indicates that the Greenwich Peninsula site, that is the area covered by GPRL's masterplan, benefits from full planning permission granted in April 2003. This is incorrect. Outline planning permission was granted in February 2004. A number of reserved matters applications for individual plots have since been approved but the permission itself is in outline.	See earlier response above. Table 3.3 has been amended.
DCS43	Barbara	Reid					The Draft London Plan identifies Deptford Creek/Greenwich Riverside as Opportunity Area 7 (OA7) and notes that this area overlaps with Lewisham. It's good to see this stated in the document but there is a need for a supplementary planning document (SPD), agreed with Lewisham, to ensure a coherence for proposed developments and an accepted context in which they are to proceed. Section 3.2.23 mentions, again, that significant infrastructure improvements will need to be delivered that will grow and enhance Greenwich for both new and existing residents as well as visitors'. This doesn't appear to have happened in OA7.	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.
DCS44	Nick & Carolyn	Carter					We have looked at this document to see how it affects our part of Greenwich; the Ashburnham Triangle. Your questionnaire is so general that we thought it better to simply write a letter. Opportunity Area 7 is not precisely defined in the document but we would presume it is the opposite side of Greenwich High Road from the Ashburnham Triangle, and so its development affects the Triangle very much. Up to now developments have been approved on a one off basis - or at least in one case rejected by the council	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

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							and then overruled by the Planning Inspectorate. A particular concern of ours is the under provision of parking spaces. We therefore support the view put forward by the Ashburnham Triangle Association... that we need a Supplementary Planning Document covering OA7 and its impact on the Ashburnham Triangle.	
DCS45	Peter	Rice					The number of residential units is too ambitious and may not be achieved - too many units in each location, building industry may not be able to deliver quality, infrastructure i.e. schools, transport will need to be in place early in development.	The number of residential units to be provided is taken from the London Plan and is something over which Greenwich Council has no control. More detail of infrastructure requirements in the Borough is provided in the Infrastructure Delivery Plan, which has been prepared in conjunction with a range of stakeholders. The Infrastructure Delivery Plan is an important piece of evidence that has influenced the Core Strategy, and the key findings from this are reflected in the Core Strategy itself to ensure that the appropriate infrastructure is delivered for the growth that is planned.
DCS47			Tesco Stores Ltd				Support for Borough's town centres being key contributors to both economic activity and employment within the Borough. In particular, support for significant development in Woolwich over the plan period including new office development, such that Woolwich will have progressed to a Metropolitan Centre by the end of the Core Strategy lifetime. Flexibility to introduce wider Town Centre uses should also be provided within Woolwich Town Centre. On retailing, support the higher level of comparison floorspace which is based on a high level of growth in Woolwich Town Centre, reflecting the Centre's increasing transport connections and its potential as a Metropolitan Centre. Support is also given to ensuring revitalisation through additional retail floorspace, new office, leisure and entertainment facilities, a new civic centre, as well as new culture and tourism uses in Woolwich town centre. We note and welcome the reference to the Love Lane planning permission, a site on which a scheme will be taken forward subject to ensuring scheme viability. We concur that the successful enhancement of Woolwich Town Centre will see a claw back of trade recently lost to neighbouring Boroughs and beyond. We also note and welcome the increased connectivity at Abbey Wood leading to enhanced development	Noted Para 3.3.5 mentions retail, office, leisure, entertainment, culture, tourism and residential in Woolwich Town Centre. It is not clear which further wider town centre uses are intended. Noted Noted

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							opportunities within its central core and the potential for renewal of the surrounding areas, having positive impacts in both Greenwich and Bexley.	
DCS48	Peter	Luck					See Q18	N/A
DCS49			Mason Developments Ltd				Delivery of a Cruise Liner Terminal for Greenwich and London It is noted that the provision of a cruise liner terminal at Enderby Wharf is supported by the Draft Core Strategy with Development Management Policies and these representations are submitted in support of this allocation of the site. Our client submitted applications for full planning permission and listed building consent for the redevelopment of the site at Enderby Wharf to provide a cruise liner terminal and mixed use development in October 2010 (application references 10/3063/F and 10/3064/L respectively). These applications secured a resolution to grant planning permission and listed building consent from the London Borough of Greenwich's Planning Board Members on 27 January 2011.	Noted
							The Draft Core Strategy with Development Management Policies identifies the Greenwich Peninsula, which includes the site at Enderby Wharf, as the focus for the majority of development in the borough over the plan period, where around 14,000 new homes are proposed to be built across two Strategic Development Locations, including Greenwich Millennium Village and Enderby Wharf. Further to this, the Draft Core Strategy states that a cruise liner terminal at Enderby Wharf will be brought forward by working with the GLA, developers and land owners with work expected to be completed by 2012. This represents an opportunity to boost the tourist spend in the borough and will stimulate development in the rest of the area. The proposals for Enderby Wharf provide a unique opportunity for the delivery of a much needed cruise liner terminal for Greenwich and London as a whole. Through the provision of a mix of land uses, the development proposals will also significantly contribute to the delivery of the borough's housing targets, as well as generating wider regeneration benefits. The delivery of a cruise liner terminal at this location is further supported by the Draft Replacement London Plan. In February 2009, the London Waterways Commission commissioned via the London Development Agency and the Greater London Authority, with support from the Port of London Authority, a report which considered the economic need for a cruise liner terminal to serve London, together with an assessment of potential sites. The Assessment of Current and Future Cruise Ship Requirements in London, published in June 2009, identified London as a 'marquee'	

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							(must-see) destination, but concluded that the lack of a purpose built cruise liner facility represented a significant missed economic opportunity. The report considered eleven potential sites for a new cruise terminal for London. Having considered each site, the report identified Enderby Wharf with a clear advantage due to the location of existing and self-scouring deep water outside the wharf, the proximity of the Maritime Greenwich World Heritage Site, and the emerging proposals being brought forward by Mason Developments Ltd which are now embedded within the submitted application. Other Key Matters We set out below a summary of other key matters that our client would like to raise for consideration: Development Potential The Draft Core Strategy should seek to promote the sustainable development objectives of national and regional planning policy. PPS1, PPS3, PPS4 and the London Plan encourage land to be used efficiently and seek for the development potential of sites to be optimised. High-density, mixed use developments should therefore be encouraged in appropriate locations, where it can be demonstrated that no planning harm is created that cannot be mitigated against in the context of infrastructure capacity, environmental impact and townscape context. Flexibility Once adopted, the Core Strategy with Development Management Policies will set out the borough's spatial strategy for the next 15 years. Our client is committed to engaging in the plan-led system, but in noting the guidance set out in PPS12, is keen to ensure that the approach taken by the London Borough of Greenwich is ˜sound', with the LDF underpinned by a robust evidence base. Policies should therefore be sufficiently flexible and not prescriptive to allow development to respond to changing social and economic factors and stimulate regeneration throughout the lifetime of the document. Viability In order for policies to be deliverable, they must have regard to viability. This is particularly important given the current economic climate, and policies set out within the Core Strategy should seek sufficient flexibility to both stimulate development, whilst responding to varying social and economic conditions. We would be grateful for confirmation of receipt of these representations and request that we are kept up to date with the progress of the LDF, including further opportunities to comment on emerging policy guidance. Our client would also welcome the opportunity to be involved in any future Examination in Public of the emerging Core Strategy document.	Density is considered within the wider Housing Design Policy (H5); it is considered that the Policy as drafted is consistent with the sustainable development principles of national and regional Planning Policy. It is considered that the Core Strategy as drafted is sufficiently flexible to allow development to respond to changing social and economic factors and to stimulate regeneration throughout the next 15 years.

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DCS52			Greenwich Hospital				Greenwich Hospital broadly supports the Spatial Strategy for Greenwich Riverside, in particular the recognition that the Town Centre will balance the needs of residents, tourists and students alike. Greenwich Hospital notes that paragraph 3.3.27 identifies two major developments in East Greenwich, which have been approved and will help deliver the vision through the promotion of a mixture of uses. In this regard, Greenwich Hospital considers that the approved major development of Greenwich Market merits inclusion at paragraph 3.3.26, due to the significant contribution that it can make to help deliver the vision in Greenwich Town Centre.	Noted The 2 sites mentioned in Table 3.4 provide a significant number of residential units. This is not the case for the Greenwich Market Scheme which is therefore not considered appropriate for inclusion here.
DCS57	Judith	Cooke	Environment Agency				PROPOSED TEXT 3.2.18 Some areas within Greenwich are at risk of tidal /and fluvial flooding. Tidal flood defences to a high standard are in place. Flood defences will be maintained and other appropriate measures sought to ensure the ongoing protection of the Borough's assets from flooding.	Para 3.2.18 has been amended.
DCS60	Lawrence	Smith	Westcombe Society				WS feels that before there is any further development on the Peninsular or Charlton Riverside it is essential that there is a guaranteed commitment to the requisite infrastructure, including public transport improvements. This must be guaranteed to be in place before any further development is occupied, even if this means not meeting the London Plan targets. This is especially important as we feel the traffic situation is already critical.	Para 3.2.23 states that new infrastructure needs to either precede or accompany development. It is not considered that it would be viable to require all development to provide all infrastructure prior to development, but where this is possible it should be achieved and This has now been added to the supporting text for Policy IM1.
DCS61	Roden	Richardson	The Charlton Society				CHARLTON RIVERSIDE HOUSING The Charlton Society also welcomes the strategic proposals for mixed-use housing in Charlton Riverside. However, it believes any development must be subject to the following aims: 1. The "mixed use" principle should be applied comprehensively; developers should not be permitted to water it down in the quest for higher profits. . 2. The monolithic pattern of housing adopted on Greenwich Peninsula is unacceptable. Building heights and densities should be more varied and under no circumstances should high-rise blocks be allowed to dominate the river's edge or otherwise impose on the riverside walk. 3. Ground level visibility of and accessibility to the river should be maximised by creating and maintaining sightlines and pathways to the river wherever possible, from as far from the river's edge as possible. 4. The incorporation of parkland, greenery, walking routes and cycleways separated from cars should be a priority. 5. The Thames Path and national cycle routes should be fully integrated into the development and into the associated transport infrastructure. 6. The development should be carefully integrated with its surroundings: a) The barrier effect of the Woolwich Road dual carriageway that currently splits Charlton Riverside from Charlton Hillside should be	Noted. The level of detail sought here is not considered to be appropriate for inclusion in the Core Strategy. However, some more detail had been added to Policy EA2. An adopted Master Plan SPD for Charlton Riverside sets out in more detail the Council's aspirations for development in the area, including transport infrastructure and design.

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ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
							minimised by introducing pedestrian- and cycle-safe crossings between the two halves of Charlton. b) Residential developments on the north frontage of Woolwich Road should as far as possible harmonise with the general character of Charlton Hillside. c) The relationship between the new mixed-use area should exploit mixed-use design techniques to relate it positively to the adjacent retained industrial and commercial zones in Charlton Riverside. The approach should also include much-needed improvements to the latter to create a showcase environment that will attract new businesses to a strategically located business zone with exceptionally good road, rail and river connections. 7 The 6000 new homes proposed for Charlton Riverside are likely to more than double passenger throughput at Charlton Station. The financial framework for the new development should include monies to upgrade the station area to accommodate this growth and provide the facilities and associated pedestrian, bus and car connectivity and circulation infrastructure that would allow the station to operate in a more user-friendly and efficient way in its role as the Metro rail transport hub serving not only Charlton but the Peninsula and the O2.	
DCS63	Patrick	Cooper					I have reviewed the Greenwich Draft Core Strategy, and as a resident of the Ashburnham Triangle wish to comment upon it. There does not appear to be any consideration of the recent developments that have occurred in the area surrounding the Triangle. These are significant: the several thousand new housing units suggest that around 8,000 new persons will be added to the local population. With specific reference to my local neighbourhood, the draft strategy does not consider how the local infrastructure will cope with this strain. Using standard GLA numbers regarding population growth (as used by Greenwich in its planning for the Greenwich Peninsula, for example), it would seem that these new homes and residents imply the arrival of 500 new school-age children for the area. What plans are there to cope with such a dramatic influx of new pupils? I raise this particular issue around education because I am a parent with children attending local schools, was a former governor of a local primary school, and am currently a governor at a local secondary school. The London Plan for south east London calls for 'new housing provision [to be] complemented by adequate social and other infrastructure'. The Draft Core Strategy, as it currently stands, does not address this requirement in any meaningful way. Our position on the periphery of the borough means that our circumstances are particular to us. Greenwich can't add services to the south or west of us because those directions take us into another borough. There's nothing much that can be added conveniently to the east of us because of Greenwich Park. And to the north is The Thames. I would request, therefore, that Greenwich produce a Supplementary Planning Document that addresses itself to the particular and specific circumstances of West Greenwich. The broad-brush approach of the monolithic Greenwich Draft Core Strategy is not, on its own, sufficient for the purposes of our neighbourhood.	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

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DCS65			University of Greenwich				The University of Greenwich, through its predecessors, has over 100 years of history in the borough. This Polytechnic was established in 1890 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. 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 countries. 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. The university wishes to strengthen and consolidate this brand by bringing more of its activities into the town, and has recently submitted a full planning application to development a new academic facility (including a new School of Architecture and Construction) and a relocated library. This will be to the benefit of both university and town. It is in this context that the university welcomes the publication of the Core Strategy, which will set out the long term spatial vision, spatial objectives and core policies for development within Greenwich. Peter Fotheringham from the University of Greenwich has recently met with Steve Tyler from the London Borough of Greenwich and talked through the university's plans and aspiration. The university is eager to ensure that the Core Strategy reflects the important role it plays within the borough and is flexible enough to reflect its evolving estate strategy, including the new development at Stockwell Street. On behalf of the university we request that we be kept informed of progress with this and future LDF documents and wish to reserve our client's position to make to make further representations on subsequent LDF documents. 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 Neil Lucas (0207 303 3782) or myself if you require any further	NOTED Para 3.3.29 refers to the promotion of development which will enhance the university offer of Greenwich Town Centre. Policy TC4 promotes the role of Greenwich Town Centre as a centre for tertiary education. It is considered that the Core Strategy as drafted reflects the University of Greenwich's aspirations. NOTED

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							information regarding these matters.	
DCS69	Laurie	Baker	Eltham Society				In section 3.2, apart from Kidbrooke, the south of the borough does not specifically figure as being part of the strategy. It is only when we reach paragraphs 3.3.34-3.3.36 that we get an inkling of what the strategy is for Eltham and the south of the borough.	An additional Key Feature has been added: **"Reinforce the role of Eltham Town Centre as the pre-eminent centre in the South of the Borough".**
DCS71		Tilfen	Tilfen Land Ltd				Spatial Policy/Key Diagram We note and support the broad spatial strategy set out in Section 3 of the Core Strategy including: 1) The identification of the Thamesmead and Abbey Wood Opportunity Area (OA25) 2) The Strategic Industrial Location comprising, inter alia, White Hart Triangle and West Thamesmead Business Park 3) The Strategic Development Location at Thamesmead comprising Tamesis/Tripcock Point. 4) The allocation of Thamesmead Town as a District Centre. In terms of Thamesmead in particular (Paragraphs 3.3.41-3.3.48): 1) Tilfen Land supports the principle of improving the offer and environment of Thamesmead Town Centre including the provision of additional retail development. However, the scope for comprehensive re-modelling will need to be balanced in the context of existing leasehold interests, viability and commercial demand. This may require a pragmatic and phased approach. 2) Tilfen Land acknowledges the importance of White Hart Triangle as a strategic employment site within the Borough and the unique opportunities it presents to deliver high quality modern employment accommodation, particularly meeting larger requirements. The recent permission granted by the Council to increase the quantum of B8 floorspace permitted at the site (to 53,000 sqm) will assist in delivering further development. 3) Tamesis Point (also known as Tripcock Point) is a Strategic Development Location which benefits from extant outline planning permission for 2,000 units. Permission was granted in May 2006 and the period for the submission of reserved matters expires in May 2016 given the change in economic circumstances since the grant of planning permission and the period for delivery of the scheme, Tilfen Land consider that the development of Tripcock Point may need to be reviewed to reflect economic and commercial circumstances. As part of any review, Tilfen Land consider that it may be necessary to assess the phasing of development, infrastructure and planning obligations to ensure the delivery of the scheme is not prejudiced.	NOTED – Further detail on this issue is provided within the Thamesmead and Abbey Wood SPD. NOTED Any proposed changes to the approved scheme will require a new planning application and will be subject to the usual planning processes. It is not considered appropriate to amend the Core Strategy at this stage as no new applications have been received.

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							Furthermore, the range of uses proposed should also be reviewed to ensure that they make a viable and appropriate contribution to the scheme. 4) We note that the Council has contemplated the scenario that major infrastructure that is required is not delivered (i.e. Crossrail, new river crossings, waterfront public transport, etc). Tilfen land support the initiative of investigating alternative means to improve accessibility should it be required.	NOTED
DCS72	David	Ballantyne	The South Gate SE10				PROPOSAL FOR THE SOUTH GATE SE10 The Whole Area: The empty shops and flats contribute to the dirty and run down seedyness of the distressed and deprived area. South Gate simply has to bear far too much traffic, too much noise, pollution and the business and their premises have suffered accordingly as well as the houses. The growth of night time licences has dramatically worsened the situation, with a further level of depression and squallor imposed at night. South Gate is plagued by night-time activities outside the takeaways, by noise, disturbances, dirt, rubbish, drunken arguments, slamming car doors, revving engines of cars and delivery scooter, urination and defecation in doorways, alleyways, & front gardens plus high levels of noise and air pollution. The dirty and greasy street and pavements now need clearing of not only dog / fox excrement but also regular sweeping and washing because of greasy food waste and discarded drinks. The volume of litter is high. Sweeping usually happens after most has blown into porches, alleyways and front gardens. Transport: The restricted width of this narrow gateway to Greenwich has been ignored for decades. There is insufficient space for pedestrians, buses and other through traffic and there is no provision for vehicular waiting or passing. Proper consideration for life and trade in South Gate should be provided with wider pavements, smaller buses, passing places and a reduced speed limit. (Historic tram passing places in South Street existed in the past). TfL and insisted on double red lines in South Street from the A2; and they almost alone dictate the inconvenient bus stops positions accordingly. TfL have increased the regular bus routes in South Street to 3 and increased their frequency. At busy times the footpaths are congested at bus stops. At other time the huge modern buses are often empty. Even the single decker to/ from Blackheath is frequently almost empty. Noise and pollution of the buses has so increased in recent years with their larger engines, exhausts & brakes, less clutch & gearbox maintenance, and their noisy hydraulic suspension adjusters and remote control door mechanisms, both of course used intensively at the bus stops. Many buses announce their approach with squealing brakes. Parking provision and enforcement: Illegal delivery vehicle parking obstruct traffc and pedestrians. Approved unloading bays needed. We wish to be involved in a thorough parking review of the provision. Private Parking Court between South Street and Plumbridge Street: Often	This is too detailed for inclusion within the Core Strategy. and some of the issues raised here are outside the remit of planning – namely public transport and anti social behaviour.

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
							dark, threatening and chaotically organised with bins, waste etc. and night time delivery motor bikes. Dirt, rubbish, food waste and wrappings proliferate. We are presently including the west half of the parking court behind Nos. 137 - 143 South Street. In the future we may well consult and include the adjacent properties backing onto this area in Lindsell Street and Plumbridge Street together with the remainder of the court. That will depend on the interest expressed and support received. A Planning Policy is long overdue for "the South Gate SE10": The extended Conservation Area was approved in December 2008. All the additional buildings in the South Gate now included should receive the same protection as all others in the Ashburnham Triangle. To alleviate the damage which has already been done to this area, all applications or other proposals should be judged by the same standards, together with the appropriate agreed guidelines for the additional shops, commercial premises and flats. However new policies should not punish occupants, owners or businesses but seek to calm matters, encourage day time trading and remove any damaging over supply of licensed premises. We should provide missing facilities and allow living and trading conditions to flourish, while encouraging any specialised concentration of appropriate uses. We need to discourage night time trade and reduce emphasis on takeaways, late drinking or other night trading. We should encourage the families and community with activities and trade mainly during daytime. Ashburnham Triangle: We border both the Ashburnham Triangle and the West Greenwich Conservation Areas. The last Conservation Area Review states "The contribution of buildings which lie outside the conservation area but which nevertheless contribute to its setting, especially buildings on the opposite side of the road, should be considered". Now we are included inside the Ashburnham Triangle Conservation Area, we are aware that we have special conditions and surroundings in South Gate that are not covered by the Advisory Leaflet for "the South Gate SE10" area and (sic to the necessary revisions to the Unitary Development Plan. All Agencies, including Planning, Conservation, Licensing, TfL, Business Support, Police, Highways, Town Manager and Cleansing, should be involved, aware of and implement agreed new policies for South Gate.	Part of the South Gate Area now falls within the Amended Ashburnham Triangle Conservation Area boundary and is subject to the associated Management Strategy.
DCS74	Alan	Harding					Most of my comments relevant to this end of the borough are incorporated in the Heathway Residents Association letter. On the wider front, given that, if you believe the 2004 Tourism Strategy figures, tourism is, after the public sector, the biggest source of employment in the borough, then the Woolwich end ought to do more to promote itself. There is something in the museum, which is a start. What we need is something to put historic Woolwich on the map for tourists. Not to mention Charlton House. The Friends could usefully have their own web site instead of squeezing on to "Leisure" where the most recent activity appears to have been in	Noted. Para 3.3.5 refers to revitalisation of Woolwich Town Centre through a number of ways, including new tourism uses. Policy EA5 supports the expansion and diversification of the Borough's tourism industry. It is considered that this is an appropriate level of detail for the Core Strategy.

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
							2006. This place should be a top tourist destination. if you have a minute, look at http://www.greenwich.gov.uk/Greenwich/LeisureCulture/Architecture/FriendsOfCharltonHouse.htm	
DCS75	Paul	Maloney	Langton Way Residents Association				The strategy makes clear that Greenwich is facing an unprecedented amount of change. We understand that the various key principles (P. 10) and strategic objectives (P. 33) will help to govern the approach to change, but it seems that the main drivers of change are population and housing stock growth. Our main general comment and concern re the Core Strategy is the lack of detail regarding the need to upgrade the core infrastructure. The population figures (P.13 & 24) show a projected growth of more than 35% in the period from 2001 - 2027 (213,000 in 2001 to the current total of 235,000 to a predicted 288,000 in 2027). This is linked to the target of 32,235 new homes by 2027 which in turn has lead to a target of 2,500 new homes per year for the next 10 years (P.41). We assume that these specific targets will be used to manage behaviours and outcomes. This high level of growth will require a correspondingly high increase in school places and school buildings, hospital beds and new hospitals, doctors, transport requirements (mainly road and rail) and all the other core infrastructure services. Although the strategy document acknowledges this in general terms and also points out that delivery of some of these are outside the capability of the local borough, there are no specific targets and no detailed Monitoring Indicators for infrastructure (P. 224). We believe that more detail is required, and that targets for infrastructure requirements should be articulated in the Core Strategy at the same level of detail as the targets for population and housing, regardless of who is responsible for delivering them (i.e. council, national government, private sector). Specifically we believe that there should be projected annual growth figures for school places, hospital beds, train and bus passenger numbers etc. It should be possible to use algorithms to calculate these directly from the annual housing targets. Specific targets are important as they would give greater focus on what needs to be done, and enable progress to be continuously checked. We believe that the planning process for demand (i.e. people and houses) should progress side by side with the planning process for infrastructure supply. If it does not, then there will be management targets for demand, but no equivalent management targets for supply. This will make it harder to plan and avoid shortage of critical	The Draft Core Strategy is predicated on a growth agenda; paragraph 3.1.2 outlines the national and regional parameters in which it has been prepared – specifically in this case, to provide a minimum of 25,950 new homes. More detail of infrastructure requirements in the Borough is provided in the Infrastructure Delivery Plan, which has been prepared in conjunction with a range of stakeholders. The Infrastructure Delivery Plan is an important piece of evidence that has influenced the Core Strategy, and the key findings from this are reflected in the Core Strategy itself to ensure that the appropriate infrastructure is delivered for the growth that is planned.

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
							infrastructure, which we consider to be the greatest risk inherent in the strategy.	
DCS77	Geoffrey	Belcher	Maritime Greenwich World Heritage Site				3.2 Proposed Spatial Strategy Given the importance of heritage and the statements made earlier in the Strategy it is unfortunate that there is no specific reference to Maritime Greenwich, although the protection of the Site is subsequently referred -to. This would be a convenient point at which to refer to the World Heritage Site Management Plan. 3.2.13 Design and Heritage Although Maritime Greenwich is quoted under unique heritage will be protected and enhanced' the World Heritage Site surely warrants a paragraph of its own, with an explanation of the relationship between the World Heritage Inscription and the town planning process.	Specific reference to Maritime Greenwich is not considered to be necessary or appropriate within this section. One of the Key Features of the Spatial Strategy is identified as "Protection of the Borough's Heritage Assets". This is considered to be sufficient here as further detail is provided elsewhere in the document Para 3.3.29 also refers to the continuing protection and promotion of Maritime Greenwich as a World Heritage Site. Policy DH4 specifically deals with the Maritime Greenwich World Heritage Site including reference to the Management Plan. It is not considered necessary to add a further paragraph concerning the WHS into the Strategy Section of the Core Strategy.
DCS78		Berkeley Homes	Berkeley Homes (Urban Developments) Ltd				3.1 In general, we are supportive of the Council's Key Diagram and Proposed Spatial Strategy which identifies the Warren/Royal Arsenal and Kidbrooke Development Area as Strategic Development Locations. Woolwich Town Centre Strategic Development Location (para 3.3.2 - 3.3.9) 3.2 In principle we are supportive of the objective to see significant growth in Woolwich over the plan period and the intention to establish Woolwich Town Centre as a Metropolitan Centre (paragraph 3.3.2). 3.3 We are also supportive or the intention to improve its importance as a transport hub with a Crossrail station to be provided by 2018 (para 3.3.3). Berkley Homes are currently in discussions with the Council and Crossrail about the provision of a Crossrail station on their Royal Arsenal site. 3.4 We note the Council's recognition in para 3.3.5 that the amount of housing within the town centre will also increase, including a new mixed use development at the Royal Arsenal site and we support this acknowledgment. 3.5 In addition, we support the figures	NOTED NOTED

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
							presented in Table 3.2 which identify that The Warren / Royal Arsenal Masterplan Area has a resolution to grant planning permission (2008) for 3,711 residential units. 3.6 We note in para 3.3.9 that the preparation of a Supplementary Planning Document (SPD) for Woolwich Town Centre is being considered. As a key stakeholder in the area, we would appreciate being notified (on behalf of Berkeley Homes) about the consultation process for this SPD once a decision regarding the document has been made. Kidbrooke Strategic development Location (para 3.3.37 - 3.3.39) 3.7 In principle we support the Kidbrooke Strategic Development Location and the objectives set out in paragraph 3.3.37. 3.8 In particular, we support the recognition given in Table 3.6 of the provision of 4,800 residential units, including 303 extra care flats, in the Kidbrooke Development Area. 3.9 However, despite Table 3.6 recognising that outline permission for 4,000 residential units, including detailed permission for 449 units (Phase 1) has been granted, it does not recognise that Berkeley Homes has also secured reserved matters approval for Phase 2 (595 residential units, including 170 extra care) and Phase 2a (115 residential units), which is a total of 1,159 residential units with detailed planning permission that are currently under construction. 3.10 However, as set out below in Section 6.0 in relation to the Draft Core Strategy Proposals Map Proposed Changes, we note that the Council's intention is to delete the Kidbrooke Development Area (KDA) from the Proposals Map. We object to this proposal for the following reasons: 1. Firstly, we are very concerned that the proposed deletion has been suggested without any form of justification being provided. 2. Secondly, given that the Draft Core strategy identifies Kidbrooke as a Strategic Development Location, we would expect the allocation of this locality as a Development Area to be retained within the UDP Proposals Map. 3. Thirdly, although part of the KDA has planning permission and is under construction, the overall redevelopment of the area will take in the region of 20 years and consists of some sites that do not currently have a planning permission for redevelopment. We would therefore expect the allocation of the KDA to remain in order to provide a supportive planning context to any future applications and redevelopment proposals that come forward in the area, at least until the target 4,800 residential units have been constructed and delivered to the housing market.	Table 3.6 has been amended. The Kidbrooke Strategic Development Location shall be shown on the Proposals Map amendemnts. Table 3.6 should reflect the most up to date permissions. **AMEND TABLE 3.6 ACCORDINGLY**. The Kidbrooke Strategic Development Location is to be shown on the Proposals Map. **Amend accordingly**

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
DCS80	Janet	Goulton	London City Airport Limited				6. Cross river links are of particular importance to LCA to open up the passenger and labour markets south of the river in Greenwich and other boroughs. 7. LCA has been excited by the use of the London City Airport DLR extension to Woolwich Arsenal and continues to lobby for a peak-time three car service on this route, and through service to Canary Wharf. 8. LCA also supports Greenwich in its regeneration aspirations associated with the development of Crossrail to Abbey Wood and Woolwich Station Development. 9. Furthermore, LCA supports the Draft Core Strategy's intention to continue to protect land in Greenwich for a fixed river crossing (3.3.44). 11. Throughout the Draft Core Strategy, an emphasis is made on encouraging new housing at waterfront locations in the borough. LCA would discourage new housing in Thamesmead along the waterfront where new homeowners may be negatively impacted by aircraft noise. 12. Where new homes are built in Thamesmead and also on the Greenwich Peninsula, LCA urges Greenwich Council to closely monitor design and construction standards to ensure that future communities are not disturbed by aircraft noise. This is particularly relevant for the development of 2,000 additional homes and a primary school at Tamesis Point as outlined in 3.3.48. 13. LCA supports Greenwich Council's aspiration to increase the quality of existing housing stock in Thamesmead as outlined in 3.17. 14. LCA would urge Greenwich Council to consider employment generative uses for land available for development Thamesmead to reduce the future growth in homes located under the LCA flight path. 15. We urge Greenwich Council to ensure developers of new housing stock in the north of the borough market their properties to potential buyers with a fair reflection of the current and permitted growth of LCA. 16. In particular, Greenwich Council might see fit to encourage developers to liaise with the Airport Monitoring Officer at the London Borough of Newham at the earliest opportunity to understand the current and predicted future LCA noise contours.	NOTED Policy IM(e) deals specifically with London City Airport and states that all applications for permission to develop sites within the outer safeguarding boundary, reproduced in the Core Strategy, will be determined having regard to the advice received from the Civil Aviation Authority. The City Airport Public Safety Zone is also to be reproduced on the Proposals Map, where there should be no significant increase in people living or working. It is considered that this is an appropriate level of detail for the Core Strategy and that no further amendments are required.
DCS81	Linda	Hodgson	Heathway Residents Association				Spatial Strategy p39 Proposed Spatial Strategy Key Features - Bullets 3,4 should be revised to also emphasise the importance of protecting residential gardens and their contribution to the total ecology and biodiversity of the borough. Environment and Climate Change p43 3.2.16 " Update to explicitly mention the heath and residential gardens	Gardens are identified as one of the Borough's Priority habitats in the Greenwich Biodiversity Action Plan. A new paragraph has been added to the Open Space Chapter to reflect the importance of gardens for the Borough's Biodiversity (paragraph 4.5.20). It is not considered appropriate for inclusion within the Key Features / Spatial Strategy Section of the Core Strategy.
DCS84	Anna	Townend	Greenwich Environment Forum				We do not agree overall, with 2027 'broad terms' of main locations for growth.	These are all Brownfield sites and reflect the Opportunity Areas and Intensification Areas as set out in the Draft London Plan.
	Frank	King					3.1. 5.: "Protecting safeguarded Wharves" This should be protecting	

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
DCS85							ALL WHARFS ALONG THE RIVER. Because, if you intend to sustain and increase the use of the Thames, you will need to protect all of the waterfront. Building ANY HOUSING along the riverbank will prevent you from doing this for a hundred years or more. In my view no housing should be built within 100 yards of the River. This land can be used for anything else including schools, shops. playgrounds, Roads, parks, Waste Management Plants, Industrial, leisure, Sports Facilities, Recreation Facilities etc. Had this policy, of not building housing within 100 yards of the riverfront, been enforced a hundred years ago all of the present insurmountable transport problems, like Greenwich Town Centre, would be very easy to solve by building a road along the river right into central London, with a few little kinks for historic buildings.	NOTED –
							N. B. At the start of the 7th line from the bottom on page 39 there is a typo viz. "tot eh" should read "to the"	AMENDED
							I note that in 3.2.8. you mention that one of the target industries that you want to encourage is "the low carbon sector"; surely these companies would wish to be beside the River in order to have the option to control their own carbon footprint by using the river for the supply of raw materials and transporting their products. This being the case they could be accommodated along the riverfront in the 100 yard zone. And referring you to my views on waste within the Borough. And my view that the Charlton and Peninsula will be strangled at birth if a new road is not built next to the river, and the Greenwich Town Centre bottleneck is not removed.	The Core Strategy does not preclude such industries from locating along the Riverfront. Charlton Riverside for example will have consolidated employment space.
							3.2.12.,3.3.2.,3.3.5. and 3.3 .7.: If you really do want to develop Woolwich Town Centre, might I suggest that a new Shopping Centre could be built at the Northern end of Powis Street by demolishing the Old Co-op buildings, The old Cuffs building and all of those buildings that the Council have offices in at present. This is a massive area of Woolwich Town Centre crying-out for a wholesale makeover, but not please a bits and pieces approach.	Policy TC2 provides more detail on development in Woolwich Town Centre. The adopted Supplementary Planning Document for Woolwich Town Centre is being provides detailed guidance for the future development of the town centre.
							AN ASIDE: In 3.2.14. you mention the 1,000 listed buildings and the many historic sites in the Borough. It might be worthwhile publishing a list of these. It might well encourage tourists to try to see all of them, thereby keeping them in the Borough for two or three days at least. Also, I have lived in the Borough almost all of my life and I did not know that there were so many listed buildings.	An index of the Borough's listed buildings is available to download online at http://www.greenwich.gov.uk/NR/rdonlyres/4D88DA46-13D7-4A50-A896-85E04AE98D3C/0/STATLISTupdatedJan2011.pdf It is too detailed for inclusion in the Core Strategy.
							3.2.15.: If blocks of flats are built in the new developments, it would be a good idea if the first two stories (Ground and 1st floor) were 4, 5 or 6 bedroom dwellings. For instance, my block is a eleven story block of half one bedroom and half two bedroom flats. The Ground and First Floors could have been built as four five bedroom flats	Policy H2 addresses housing mix on new developments, based on the findings of the South East London Housing Market Assessment. The change sought here is too detailed for the Core Strategy. NO

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Spatial Strategy (Refer to sections 3.1-3.3) - Question 6: Do you have any comments on the Spatial Strategy?**	**Council Response**
							easily (each taking-up the same space as two flats), all with their own section of garden as the Ground Floor flats could have a back door and the first floor flats could have a fire escape leading onto their garden section. This would not increase the ground area of the block at all.	CHANGE

DCS 22	Novalong Ltd	Question 6	In circumstances where there is an identified need in London generally to maximise the provision of new homes, a further (perhaps second) Key Feature of the Proposed Strategy should be to: "Give priority to the residential development of all sites suitable for that use". After the bullet point under the Key Features of the Proposed Strategy relating to Kidbrooke, to reflect the need to balance development across the Borough, a bullet point should be inserted reading: "Elsewhere within the Borough, including in the southern part, opportunities should be taken to maximise the provision of new development, particularly residential". To recognise that not all open spaces are worthy of protection and enhancement, the eleventh bullet point under Key Features of the Proposed Strategy should include the wording "important public" between "Borough's" and "open". Contrary to the requirements of the draft Replacement London Plan and the presentation of the housing provision figures elsewhere in the draft Core Strategy, at Paragraphs 3.2.4-7 inclusive relating to Housing, it is not made clear that the number of dwellings proposed is to be the minimum. This applies to both the absolute numbers and the average yearly targets. With respect to Environment and Climate Change, it should be recognised that not all the open spaces in the Borough are worthy of protection or enhancement. It is suggested that the third sentence should be amended to read: "Important open spaces will be protected and enhanced and will positively contribute towards regeneration, tackling climate change, the health and well being of the people of Greenwich and the wealth of biodiversity in the Borough, but open spaces that do not deliver public benefit may be considered for redevelopment". Reflecting the need to balance development between the north and south of the Borough, in that part of the draft Core Strategy covering The Places of Greenwich/Locations for Strategic Development, the area descriptions relating to the southern part of the Borough (such as Eltham and the South of the Borough) should be worded to refer to the fact that they do have development potential. Such an approach, where sites are close to the Borough boundary, would also cover the opportunity to fulfil the cross-border requirement referred to at Policy 2.5A and Paragraph 2.22 of the draft Replacement London Plan.	No change is considered necessary. Key features includes a minimum of 29,078 new homes. Policy H1 Housing sets out minimum targets. It is not considered appropriate to distinguish between different types of Open Space here. The wording in para 3.3.37 reflects the potential for growth in Eltham town centre.
DCS88	Cory	Question 6	Site Context Cory has operated a bargeworks at this site since the 1800's, and are currently in the process of finalising the designs for a comprehensive refurbishment of the existing site. The Bargeworks and associated offices are to be modernised to become more efficient, effective and ensure that the facility remains a viable asset for both the Cory fleet of barges and tugs, and for the servicing of third party vessels. The Bargeworks site is located within a rich industrial and maritime setting, characterised by working wharves, open yard aggregates, crushing and scrap uses. This is something which is recognised by the sites current allocation within a defined Industrial Area and an Aggregates Zone, UDP policies J1 and J2 respectively.	Comments noted.

Question 7 – Reasonable Alternative Spatial Strategy - Do you feel that the most appropriate strategy has been chosen for the Borough?

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Reasonable Alternative Spatial Strategy (Refer to section 3.4) - Question 7: Do you feel that the most appropriate strategy has been chosen for the Borough?**	**Council Response**
DCS10			CIS Ltd	Richard	Blyth		While we would agree with the Council that the optimum approach for the Core Strategy is for the best use to be found for riverside locations, and to provide homes for existing residents and to attract new residents, we would also observe that the Alternative Spatial Strategy might be more deliverable than the Preferred Strategy. Since the Alternative does not depend on major investment in public transport, it may be more likely actually to take place, leading to benefits for housing and environmental objectives arising from reuse of otherwise underused or derelict land.	Noted, and agree that deliverability is certainly important. However based on the evidence collected, the consultation responses and the findings of the Sustainability Appraisal, the alternative spatial strategy is not considered to be the most appropriate spatial strategy for the Borough.
DCS22			Novalong Limited	Richard	Jones	Planning Perspectives LLP	Of the two set out, yes. However, the Proposed Spatial Strategy should be amended to take account of the points identified above.	Noted. Other points identified are responded to individually.
DCS25		Waite					We feel unable to comment intelligently on this, as we have not been party to the detailed discussions.	Noted
DCS29		Mayor of London	Greater London Authority				TfL would support the preferred spatial strategy rather than the suggested alternative, as this would better help to deliver improved public transport links in the borough. If this strategy is taken forward however, it would be essential that funding for these potential new links is secured through the planning process. It should also be noted that the balance between delivery of new housing and release of SIL needs further discussion as set out in the responses on SIL and Housing in Appendix One.	Noted
DCS45	Peter	Rice					yes - phased development would ensure that housing unit take up would match demand and permit land bank of industrial land to be marketed to confirm whether there is still demand - possible loss of future employment. Development in itself will provide training/ employment opportunities	Noted
DCS48	Peter	Luck					Both the favoured strategy and the alternative are seen as high growth strategies but the alternative is rejected in large part because, in producing fewer dwellings in Charlton Riverside, it may not support improved transport in that area. Is this the major concern? Should more attention be given to achieving a high level of employment and a high level of variety in employment including businesses dependent on manual skills and the 'messy' trades? Is it good for London if these are pushed further and further to the periphery when the centre still has need of them? Probably not. Is it reasonable to suppose that all inner city dwellers will be content to work in office, retail or (non-messy) service roles? Probably not. What discontents will arise from insisting on these employments, as the preferred strategy seems to do?	Noted, however Based on the evidence collected, the consultation responses and the findings of the Sustainability Appraisal, the alternative spatial strategy is not considered to be the most appropriate spatial strategy for the Borough.
DCS56	Chris	Holland	Blackheath Park Conservation Group				We are concerned that long term quality of life in the capital will be adversely affected by permitting ever more intensive use of land. We consider the London Plan is flawed in encouraging intensification into the far future especially in lower lying areas; and we therefore consider the Greenwich Plan should provide for as little future development as is possible within the test of general conformity to the London Plan. We therefore express a strong preference for the Alternative Core Strategy.	Noted, however Based on the evidence collected, the consultation responses and the findings of the Sustainability Appraisal, the alternative spatial strategy is not considered to be the most appropriate spatial strategy for the Borough. The London Plan forms part of the borough's development plan and the Council's Core Strategy must be in general conformity with the London Plan.
DCS60	Lawrence	Smith	Westcombe Society				In principle WS supports the chosen strategy but in practice, should the conditions mentioned in our answer to question 6 not be met, we might prefer the alternative strategy.	. It is not considered that it would be viable to require all development to provide all infrastructure prior to development, but where this is possible it should be achieved and additional supporting text has been added to Policy IM1 to that affect.
DCS69	Laurie	Baker	Eltham Society				I think the correct strategy has been chosen, given that there is unlikely to be a demand for industrial land in Greenwich	Noted
DCS84	Anna	Townend	Greenwich Environment Forum				with amendments outlined here and others - we will need to see the results of the Draft Core Strategy and results of full consultation on that.	Noted

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Reasonable Alternative Spatial Strategy (Refer to section 3.4) - Question 7: Do you feel that the most appropriate strategy has been chosen for the Borough?**	**Council Response**
DCS85	Frank	King					I very much prefer the alternative strategy a s set-out in 3-4 and firmly believe that to block-up our Riverside with housing, which cannot be removed once built, would be the biggest mistake that the Council can possibly make, and would be a very shortsighted policy and one that future generations would rue.	Noted, however Based on the evidence collected, the consultation responses and the findings of the Sustainability Appraisal, the alternative spatial strategy is not considered to be the most appropriate spatial strategy for the Borough.

Question 8 – Reasonable Alternative Spatial Strategy – Do you feel that there are any other reasonable alternatives that have not been considered?

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Reasonable Alternative Spatial Strategy - Question 8: Do you feel that there are any other reasonable alternatives that have not been considered?**	
DCS22			Novalong Limited	Richard	Jones	Planning Perspectives LLP	Yes. A Spatial Strategy that maximises the potential across the Borough for residential development on suitable sites, including on open space of no strategic importance and from which the public do not derive benefit. An alternative spatial strategy should also have regard to strategic importance of partnership-based, cross-border working, as envisaged in Policy 2.5A cover Paragraph 2.22 of the draft Replacement London Plan. In this regard, when considering the Alternative Spatial Strategy, the draft Core Strategy notes the vulnerability of the strategy to the general economy and records that, even at the high point in the previous economic cycle, Greenwich only achieved 2,000 annual completions compared with the minimum of 2,595 now being assumed. Whilst it is noted that 70% of the 10 year target already benefits from planning permission, and that 99% of the provision is expected to be on brownfield sites, there is clear uncertainty around the ability of the Proposed Spatial Strategy to deliver the level of housing required and therefore the Core Strategy needs to allow for every opportunity to be taken to develop sites for residential purposes. In accordance with the recommendation of PPS3, the Core Strategy should contain a target for development on previously developed land. This should be a reasonable target, taking into account the risk of lower value previously developed land not coming forward for development for economic reasons. A particular concern is that many of the sites in the north of the Borough are complicated and expensive to develop and therefore delivery of residential units in this part of the Borough on the scale assumed cannot be guaranteed. Whenever possible, this should be balanced through the identification and bringing forward of less constrained opportunities elsewhere in the Borough.	It is not accepted that developing on the Council's open spaces should be part of the strategy. It is the Council's opinion that this would be unreasonable, in light of London Plan and national guidance protecting open spaces from inappropriate development. The housing trajectory which forms part of the proposed submission version of the Core Strategy demonstrates that there is sufficient land in the borough to meet its housing targets without developing on open spaces. The Council believes that the strategy is sufficiently flexible to aid appropriate development to take place in the borough while protecting the borough from schemes that are inappropriate.
DCS25		Waite					That depends on the official definition of "reasonable alternative". In most cases, you have looked at a strategy and then at its opposite i.e. 'doing it' versus 'not doing it'. There is no apparent evidence of genuine creative thinking - but this may be prohibited by the terms of the study and other restrictions e.g. the London Plan.	Comment noted The contingencies section of the draft core strategy looked at a series of 'what if' scenarios, where it was appropriate for the document to look at what would happen if aspects of the development didn't come forward. It may be that this comment relates to the contingencies.

								The reasonable alternative of the Draft Core Strategy essentially investigated the potential for the development to take place at a slower rate with less redevelopment at Charlton Riverside.
DCS42			Greenwich Peninsula Regeneration Ltd	James	Wickham	Gerald Eve	3.5 - Contingencies We agree that delivering the Borough's housing target may be challenging, especially in view of difficult economic conditions in the early part of the plan period. We suggest it would be helpful to include a further question and answer, as follows, to suggest how the Council could act to prevent this occurring: 'What can be done to prevent this? 3.5.9 Whilst responsibility for the delivery of new housing, especially market housing, primarily rests with developers, the Council will be sensitive to prevailing economic conditions and scheme viability when determining individual applications for housing development. In particular, it will be flexible in the application of policies on affordable housing, s106 contributions and energy efficiency/ sustainability in order to ensure a balance is struck which reflects priorities and the delivery of residential development is not impeded, especially in difficult economic periods.	Noted – the Council believes that there is sufficient flexibility in the Core Strategy and applies that flexibility where appropriate in the assessment of any proposal.
DCS45	Peter	Rice					fully covered	noted
DCS84	Anna	Townend	Greenwich Environment Forum				Yes, as outlined, an additionally verbally at the various consultation meetings.	noted

Question 9 – Housing – Do you have any comments?

	Consultee			**Agent**				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Policy Sections (Refer to sections 4 and 5) - Question 9: Housing (Refer to sections 4.1 and 5.1)**	**Council Response**
DCS4	Lucy	Owen	Port of London Authority				Policy H5 Housing Design: This makes reference at (v) to an acceptable level of noise insulation being achieved in developments vulnerable to transportation noise and vibration. Given that many of the proposed development sites would appear to be in close proximity to safeguarded wharves it is considered that the policy should be widened to include a reference to an acceptable level of noise insulation, air quality and lighting levels being achieved in developments next to or opposite safeguarded wharves to ensure that the requirements of policy 4C.9 of the London Plan are met.	Have amended the support text to Policy H5 to include reference to noise protection from safeguarded wharves. It was not felt necessary to include reference in the text of the policy itself.
DCS9	Paul	Webbewood					In para 5.1.12 there should be some definition of what is meant by a 'nearby' play area. There is a big difference between 100 yards and half a mile in this context.	Noted. The emerging Open Space Strategy addresses the issue of accessibility of play areas. It is not felt necessary to define 'nearby' any further than is already in the Core Strategy.
DCS10			CIS Ltd	Richard	Blyth		Policy H5 Housing Design: We welcome the phrasing that the Council proposes to consider achievement of Code 6 after 2016, rather than require it, and note that the draft London Plan does not enshrine specific Code levels for private development at statutory policy level. We are not convinced that in Greenwich there is any particular case for going beyond London-wide or national policy in homes design for sustainability.	Noted

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DCS13	David	Kerr					Policy H(c) Backland and Infill Development (page 141) Para 5.1.5. Please add at end: "In the Borough's tight urban fabric the opportunities for an acceptable form of this development are increasingly limited as the number of available sites decreases." This wording has been omitted when para 3.30 of the UDP was transferred to the draft core strategy. The 2009 draft Management Strategy for the Blackheath Park Conservation Area contained a recommendation that further backland/infill development should only be approved exceptionally. Please consider adopting this recommendation more widely as policy across the 20 Conservation Areas.	Agreed. The additional sentence from paragraph 3.30 of UDP will be added into the supporting text for H(c). Comment regarding management strategies have been noted and will be considered further when other Conservation Area Management Strategies are prepared.
DCS21	Carmelle	Bell	Thames Water Plc				Policy H5 Housing Design - Climate Change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water supports water conservation and the efficient use of water. All new dwellings should meet the water usage targets set out in code for sustainable homes code 3 rating as a minimum.	Noted – the Core Strategy will seek to go further than the water usage targets for Code for Sustainable Homes level 3 (120L/day).
DCS22			Novalong Limited	Richard	Jones	Planning Perspectives LLP	The first sentence of Paragraph 4.1.1 confuses aspiration with achievement: Greenwich already makes a major contribution to London's housing provision, having the second largest target for new housing of all London boroughs. This should be revised to read: If successful in its strategic housing objectives, Greenwich will make a major contribution to London's housing provision, having the second largest target for new housing of all London boroughs. The support paragraphs to Policy H1 relating to New Housing (Paragraphs 4.1.3-6 inclusive), in the context of the footnote to the Policy that the broad location and specific sites within the Borough which are crucial to meeting the housing targets are discussed elsewhere in the document, identify the risk that the permitted housing schemes referred to may not come forward for economic or other reasons. Against this background, the text should be supportive of applications for residential development on suitable sites not previously identified. It should be recognised that certain of these sites may not be brownfield locations. Policy H3 relating to Affordable Housing is that, for residential schemes over certain thresholds, at least 35% should be affordable housing. Whilst the Policy goes on to note that site specific characteristics will be a consideration, the Policy as worded implies that this will only be the case once the minimum of 35% affordable housing has been provided. Therefore, the words at least should be deleted and replaced with a more flexible phrase such as in the order of. It is noted that the Policy includes an apparent footnote advising that the proportion of affordable housing is subject to the finalisation of an Affordable Housing Viability Assessment. Policy 3.13B of the draft Replacement London Plan states that affordable housing negotiations on sites should take account of their individual circumstances ¦ including development viability. This should be recognised in the main body of Policy H3 by adding at the end of the second sentence ¦, including the viability of the proposal. The supporting text to Policy H3 at Paragraph 4.1.11 proposes a tenure split of 70% social rented and 30% intermediate for the affordable, noting that this is a departure from the draft Replacement London Plan 60:40 split. Particularly with the demise of grant funding for affordable housing, a 70:30 split is unrealistic and, if proportions are to be specified, the draft Replacement London Plan 60:40 split should be relied upon. However, in the current funding crisis, specifying any split is inappropriate. Policy H5 relates to Housing Design. It proposes consideration of residential proposals against very high standards in terms of the Code for Sustainable Homes, Building for Life, the London Housing Design Guide, Lifetime Homes and other matters. Taken together, complying with these standards will so damage the viability of residential development, particularly in the current economic climate, that schemes quite simply will not come forward. Therefore, rather than specifying a raft of standards to be complied with, the Policy should comprise a general requirement to maximise the standard of housing design as far as feasible on individual projects. Specifically, it should be noted that the Government has now announced that the target for 2011 will be Code Level 3 rather than Code Level 4. It is noted under the consideration of Reasonable Alternatives that Policy H5 goes beyond the draft Replacement London Plan requirements and the requirements of the London Housing Design Guide. There is no justification for this to be the case.	Agreed to change first sentence of 4.1.1 to correct the tense of the statement. H1 - Disagree that changes should be made to the document that makes it easier to develop on greenfield sites. The Borough has enough existing brownfield land without needing to develop on greenfield sites. H3 – comments noted. Regarding the split of social versus intermediate rents, the Core Strategy has to be in general conformity with London Plan but can have differences on matters such as this. H5 – The Borough has expected a high standard of design in previous development plans and has continued to

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								see significant growth in previous years. The need for additional housing can not be at the expense of good quality design.
DCS24	John	Franklin	Greenwich Society				STRATEGIC POLICIES Policy H1 New Housing Paras. 4.1.2; 1; 4.2.11; We note that the target for new housing provision in Greenwich is 32,235 new units for 2012 to 2027, of which 25,950 units relate to the first 15 years. This is an average of 2595 units pa for 2012-21 and 1480 units pa for 2022-27. For the period up to 2021 the target is based on the Mayor of London's Draft London Plan (DLP) target for London as a whole of 33,400 pa for the period 2011-2021and his allocation to Greenwich of 2595 units pa. The DLP targets are based on detailed assessments of need and of land availability, as explained in the DLP, though we note that the overall target is at the bottom end of the range recommended for Greater London by the National Housing and Planning Advisory Unit. In the light of these assessments we do not wish to challenge the desirability of the housing targets for Greenwich contained in the Draft Core Strategy (DCS). However we do have doubts about their achievability, at least in the short to medium term, and consider that their adoption should be subject to some important conditions relating to Greater London as a whole. The concern about realism relates to the current economic situation and the historically low level of house building. As the DCS itself reports, new housing completions in Greenwich have only exceeded 2000 once in the past 10 years, so the target of 2595 units is very ambitious. It seems unlikely, starting from the current low base of completions and restricted availability of mortgage finance, that the target of 2595 units will be achieved in 2011/12 or perhaps for some time after. Additionally, there must be doubt about whether shortfall in the early years of the target period could be made good in the medium term. The risk with an unrealistically high target is that development which does occur is insufficiently concentrated to provide the justification for an adequate provision of physical, social and environmental infrastructure and services for the new housing. We recognise that calling into question the target of 2595 units pa challenges the DLP, but this is still in draft and the concerns expressed above pertain to all London Boroughs, so there may well be scope to negotiate some reduction in the targets for the early years, perhaps offset by increases in the longer term, eg from 2022-27. Our other concern relates to the fact that the DLP sets Greenwich the second highest housing target of all the London Boroughs. This may be justifiable, as argued, by reference to higher population growth and household formation in Greenwich and to the greater availability of land for housing development. Nevertheless Greenwich Council should make its acceptance of this target (or a somewhat lower one as suggested above) conditional on two requirements involving the Mayor of London. First, the Council should not adopt the target until it is clear that all other London Boroughs are accepting their targets. Second, the Council should use the fact that Greenwich would be shouldering a larger share of new house building than all but one other London Borough, to obtain firm commitments from the Mayor of London that he will prioritise investment in transport in Greenwich which is essential to support the planned new housing. The Mayor should in particular be asked to re-instate the plan for the provision of a riverside rapid-transit system 'if necessary on a PFI basis between West Greenwich and Thamesmead and to provide enhanced bus services in areas south of the Thames where new housing is located. The DCS explains that most of the new housing development will be concentrated in a number of key locations, particularly along the riverfront. It does not say what number of dwellings are expected to be located elsewhere across the borough to meet local needs, for example for old people's housing so that so that they can remain close to where they currently live, or to take advantage of small sites and redevelopment opportunities. Nor is there any discussion of housing renewal except at Kidbrooke, although this can have implications for planning both as regards any net change in the number of housing units on a site and the need for associated infrastructure and services. Policy H2 Housing Mix: We endorse the use of the SHMA indicative figure of 61% for the proportion of new dwellings to be 3 bedroom or larger. This would not only meet the needs of families with children but also recognise that, with rising living standards and increased working from home, one and two person households increasingly wish to live in larger dwellings. The aim should be to achieve close to the 61% target on all developments, provided that they have or will have access to schools and other necessary services, rather than to concentrate all the family units in a few. Policy H3 Affordable Housing: We endorse the target of 35% for the share of affordable housing to be built in all new housing developments above 10 units or 0.5 hectares, and that this should be divided into 70% social rented and 30% intermediate. These	The concerns over the ability of the borough to meet the housing targets are addressed by the Council in the 'Contingencies' section of the core strategy, which sets out 'what if' scenarios. It is worth remembering that the core strategy has a 15 year plan period so the current housing market will no doubt change and fluctuate over that time. The Borough has sufficient land availability to meet its housing targets. Additional references have been made to older persons housing in support text of the Housing Mix policy and the Supported Housing Policy. It should be noted however that the Council's primary strategy for supporting older people is to provide sufficient social and health services for them to be able to live in their own homes for as long as possible. It is felt that

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							targets may need to be reviewed once it is clearer what the effects of Government policy changes, such as reductions in housing benefit and abolition of lifetime tenancies, may have on the different components of demand. The targets should in any case be kept under review in the light of factors such as changing affordability of housing and the profitability of private house building and hence scope for increased cross subsidy. We note that the DCS says that the 35% affordability target should include some provision for student accommodation. We are not sure why this is proposed as most students have limited incomes and other means exist to help those in greatest need. This is the only reference to student accommodation in the DCS. Student demand for accommodation, particularly that arising from higher educational establishments within the borough, and its implications for overall housing demand, should be addressed explicitly in the housing section, and the case made in clear terms for any expansion of provision. Policy H5 Housing Design: We strongly endorse the policies in the section on housing design. Good design of new housing is of a paramount importance to the well-being of those who live in it, to its fitness for purpose over the long term and to its reception by existing neighbourhoods. However we think some of the policies should be more ambitious, and we comment in the following paragraphs on housing densities. We think it is particularly important to implement the Code for Sustainable Homes on the timetable proposed, the dates in which should apply to housing starts not grant of planning permission; to provide family housing with access to a private garden; to include explicitly, in the policy on noise, insulation against noise from neighbouring dwellings; and to ensure that landscaping is highly permeable. We consider that the target of 10% of dwellings to be built to wheelchair standards on developments of 25 units or more should be more ambitious in view of the projected ageing population. It is important that the wheelchair standard applies also to external access such as parking spaces, paths, communal entrance doors and lifts. The discussion of housing densities is very brief and tucked away in the Housing Design section. This is rather unsatisfactory given the significance of housing density for the quality of life of new occupants, for the demands on infrastructure and services and for the physical and environmental impact on existing development. We are particularly concerned about the quality of life for families with children living in high density developments. Para 4.1.32: We consider it inappropriate to simply state that. The Council will utilise the Draft London Plan Policy 3.4 to guide rates for housing density; this requires the public to obtain and refer to the DLP, as well as to the Core Strategy document. We consider that the Density matrix (habitable rooms and dwellings per hectare), Table 3.2 in the London Plan, should be reproduced in the Core Strategy document, say at the end of the Density section following the blue box, Reasonable Alternatives. Table 3.2 refers to ˜Public Transport accessibility Level (PTAL). This also is confusing for the average reader: we consider that there is also a need for a map of the LBG Accessibility Levels (from TfL) to be included also here for clearer understanding of how the density matrix works. Para 4.1.33: We consider the wording of this paragraph to be too loose, leaving it wide open to developers to exploit. It suggests that the densities proposed for 'central' locations would not be appropriate in Greenwich except perhaps around Woolwich town centre, and that it would not be appropriate to define areas around the borough's other district centres as 'urban'. We welcome this statement however, it has been argued before that 'Central' area densities should apply in certain areas where, environmentally, 'Urban' area densities would have been more appropriate. We are concerned that its under-emphasis in the DCS will do little to discourage developers from always coming forward with proposals whose densities exceed the guidelines. A clearer signal needs to be given that densities above the guidelines will in no circumstances be allowed in Greenwich â€" and it is recommended that 'zones' be shown on a map of the Borough to indicate where the higher 'Central' area densities might be considered acceptable. This would reduce the 'hope element' in land values and thus reduce somewhat the financial pressure on developers to maximise densities. The considerable list of proposed housing design requirements raises the question of whether the Council is equipped to ensure compliance with them. To do so calls for a wide range of skills including architecture, urban design in its broadest sense, environmental sciences and building technology. Does the Council have these skills in-house? If so, will it be able to maintain them in an era of cuts? If not, has it the resources to buy them in, eg from consultants? With the withdrawal of public funding from CABE and the abolition of the GLA's Design for London there will be less free advice available externally. Is there a case for using the services of an architecture centre, or should the remit of the Conservation Group be extended, or should the council set up an architecture advisory panel comprised of relevant professional who are prepared to offer their services free? DEVELOPMENT MANAGEMENT POLICIES The Greenwich Society supports the draft Development Management Policies and has no comments to make.	a specific policy on older person housing is not appropriate. The support text for Policy H3 has been amended to make it clear that developments of student accommodation that is not robustly secured for student use will be expected to make a contribution towards the provision of affordable housing, The requirements for wheelchair housing are appropriate. However, there has been further support text added to Policy H5 regarding the requirements of Lifetime Homes (expected in all new homes) to more clearly show that it would benefit special needs groups including older people. All other comments are noted.
DCS25		Waite					We accept the use of brownfield sites and for mixed dwelling sites but are concerned lest these are not achieved thus increasing piecemeal development elsewhere without proper impact assessment. It is shameful that public transport (not good anywhere in the Borough: frequent lapses on DLR and Jubilee Lines) should be used as an excuse to increase housing density. Crossrail to Woolwich remains uncertain.	Noted

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DCS29		Mayor of London	Greater London Authority				H1 The adopted London Plan sets a target of 20,100 additional homes for the period 2007/8 to 2016/17. This works out as an annual monitoring target of 2,010 homes. The draft replacement London Plan 2009 sets a target for Greenwich of 25,950 dwellings for the period 2011 - 2021 with an annual monitoring target of 2,595 homes. The core strategy sets a target for the plan period (2012-2027) of 32,235. This consists of 2,595 dwellings per year as per the Draft Replacement London Plan for the period 2012/13-2020/21 plus an additional 8,880 dwellings from 2020/21-2026/27. The supporting text references the Strategic Housing Land Availability Assessment (SHLAA)/Housing Capacity Study (HCS). The target will be met through a variety of means and it currently appears to be predicated on large scale industrial land release at Charlton Riverside and Greenwich Peninsula West which is not in general conformity with the London Plan. In addition the development at Charlton riverside is stated as being dependant on public transport infrastructure improvements in the waterfront area. These works are not in TfL's investment plan and therefore the delivery of this development is questionable. Further discussions are needed on the location of the sites proposed and the potential for release of Strategic Industrial Land before it can be agreed that this policy is in general conformity with the London Plan. H2 In paragraph 4.1.10 the core strategy is proposing a tenure split for all new affordable housing of 70% social rented and 30% intermediate housing. This complies with policy 3A.9 of the London Plan but does not comply with the emerging guidance within policy 3.12 of the draft replacement London Plan. The justification for this is that it better reflects the need for social rented housing in the Borough. This approach is accepted subject to the evidence base being made available for verification. H3 The Council has set a policy target that at least 35% of additional housing, with developments of more than 10 homes or on sites of 0.5 hectares or more, to be built in the borough over the plan period should be affordable. Policy 3A.9 of the London Plan (Affordable housing targets) and policy 3.12 of the draft replacement suggest that boroughs should set an overall target for the amount of affordable housing provision over the plan period in their area based on a variety of criteria. In particular, this will include regional and local assessments of need. This proportion will need to tested through the affordable housing viability assessment that is currently being finalised. H5 Policy H5 Housing Design states that housing development will be expected to achieve a high quality of housing design and integrated environment. Factors to be considered include: consistency with the Mayor's Housing Design Guide, meeting lifetime homes standards and 10% of all dwellings to be fully wheelchair accessible or easily adaptable to be wheelchair accessible. These provisions are supported. Omission Concern is raised over the omission of the needs of older people which are specifically mentioned in the DRLP as having distinct housing needs.	H1 – SHLAA figures included a release of SIL at Charlton and Peninsula West but both sites were discussed with GLA officers and were agreed to be included. Further discussions have taken place between RBG and GLA and the boundaries of both areas have been amended. H2 – There is a greater need for social rented housing in Greenwich than wider London and the intermediate housing has been difficult for developers to shift. The Affordable Housing Viability Assessment has now been published. No change is proposed to the Core Strategy. H5 – Additional references have been made to older persons housing in support of the Housing Mix policy and the Supported Housing Policy. It should be noted that the Council's primary strategy for supporting older people is to provide sufficient social and health services for them to be able to live in their own homes for as long as possible as they age so a specific policy on older person housing is not appropriate.
DCS32	Nicolas	Long					There is little in recent developments around Greenwich High Road, Creek Road that have added to the character of the area	Noted

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DCS33	Caroline	Evans					I am broadly in support of the policies put forward in this section and agree with the statement, in 4.1.1, that 'we need to ensure that the appropriate size, type, density and affordability of homes are provided, and that the new housing is catered for with associated infrastructure. This hasn't been the case with recent developments in Greenwich Riverside. I am pleased to read that the key finding of the Sustainability Appraisal is creating a greater mix of housing types and sizes will have positive effects by enhancing diversity of local character and integrate provision of family housing and family amenities such as schools, play areas and local shops. I hope that these amenities will be realised, and I look forward to seeing a rich mix of styles and architectural approaches in the developments.	Noted
DCS34	Palvinder	Banwatt	Charlton Central Residents Association				3.0 Housing CCRA recognises that land at Charlton Riverside provides significant potential for development in order to accommodate the 18.5% increase in the borough's population by 2027. If this is planned sympathetically and takes due account of the additional requirements for educational, health and recreational facilities in the area, it will lead to an improvement of the local environment. However if any one of these elements is inadequately addressed, it will result in a deterioration in the quality of life for local residents. The strategy acknowledges the current residential nature of Charlton and recognises that it already has: pockets of deprivation areas with high density housing Any further developments should therefore be planned with due diligence to ensure that the current situation is not exacerbated. Instead we are looking for a significant enhancement of our area not merely the intention expressed in the document to maintain the character of Charlton. The strategy outlines some very ambitious targets for both new housing and enhancing the local environment. Unless stringent controls are in place and effective monitoring implemented, the two aspirations could prove incompatible. The strategy also suggests that 90% of the housing development will be in opportunity areas / areas of intensification. What are the proposals for the remaining 10% (in excess of 2,500 dwellings)? How will this development be monitored? If the latter is allowed to proceed in a piecemeal fashion by the private sector, it could have a cumulative negative impact on the local environment and infrastructure. It would be helpful to have greater clarification of procedures to prevent the use of gardens and small green spaces for development purposes, particularly in densely populated areas. Our understanding is that, following an appeal by Galliard Homes, planning has been granted for a significant development on part of the Squirrel Storage site which extends roughly from Victoria Way to the Blackwall Tunnel approach road. This development of 230 flats, office and living and working space will add to the stress on the services and infrastructure in Charlton. Yet there is no mention of the proposals for this site in the Core Strategy. CCRA welcomes the proposal for a mix of types and sizes of dwellings to accommodate the needs of future residents. It is unclear to what extent this has been informed by the likely changes to local demography. In particular, we feel that there is inadequate consideration of the requirements of older people who will make up a significant proportion of the borough's population.	Support for the development at Charlton Riverside is noted. The recent Masterplan SPD for Charlton Riverside helps provide the finer details and guide development at the site.
DCS37	Greenwich Wharf Ltd		Greenwich Wharf Ltd	Sam	Hine	DP9	Policy H2 Housing Mix The supporting text identifies the regional housing needs assessment's findings for the region and translates this for Greenwich. It then stipulates that any development in the Borough will reflect these needs. This contradicts the Policy itself which recognises factors that will affect the appropriate mix. The final sentence to the supporting text should be amended to indicate these are Borough wide targets not for individual sites. Policy H3 Affordable Housing The policy does not make explicit reference to the location of the affordable housing. PPS3 and the draft Replacement London Plan make provision for affordable housing to be provided off-site or payments in lieu in certain circumstances. It is requested that these alternatives are recognised in Greenwich's policy to bring it in line. Paragraphs 4.1.32 & 4.1.33 Density The flexible approach to defining 'central', 'urban' and 'suburban' areas is welcomed in assessing schemes against Replacement London Plan Policy 3.4. In identifying appropriate exceptions we request that recognition is given to waterfront locations as an area where higher densities may be appropriate. The Plan's tall building policy recognises the potential for tall buildings at waterfront locations on the Greenwich Peninsular and there is a history of planning decisions by the Council for higher density because of this, including at Greenwich Wharf. This should be recognised in the policy guidance.	Regarding density, the riverside areas largely have planning permission already but being near the river doesn't necessarily warrant higher densities. It is a combination of factors including access to public transport and position in relation to town centres. Mixed tenure schemes are best able to provide diverse and healthy communities. While the Council considers applications for off site provision of

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								affordable housing, mixed tenure schemes are much preferred.
DCS40	Clare	Kemsley					I live on Greenwich High Road and feel strongly that there should be appropriate detailed long-term plans for the area's development. In particular, we need a supplementary planning document for the immediate area. I make particular reference to the two strategic objectives of the Draft Core Strategy: * to protect and enhance Greenwich's rich natural and built heritage* to promote high quality architecture and urban design in all developments in Greenwich. It's important that Greenwich High Road sees effective implementation of these objectives. A lot of piecemeal development has already happened or been planned, and I don't think that it all meets these criteria. However, we should not assume that it's too late to implement more appropriate planning. Immediate steps should be taken to make sure any further development is planned and controlled with a supplementary planning document or equivalent neighbourhood plan. The architectural character of the area should be improved (or maintained where appropriate), rather than worsened by development. And it must have a positive impact on the experience of current and future residents. I am keen to continue living on Greenwich High Road and I hope that new developments retain what's good about the area, and make real improvements where necessary. However, we can't rely on piecemeal planning to achieve this. I have strong concerns that without appropriate long-term planning, it may deteriorate as a residential area rather than improve. I hope the council is able to ensure that a supplementary planning document is produced for our area.	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.
DCS42			Greenwich Peninsula Regeneration Ltd	James	Wickham	Gerald Eve	Policy H2 Housing Mix We object to Policy H2 and the reasoned justification as currently phrased. Paragraph 4.1.9 states that it is expected that any development in the Borough will reflect the housing needs identified in the South East London Strategic Housing Market Assessment. The SHMA found that 43% of market housing and 70% of affordable housing should be larger three and four bedroom units. It would not be practical, desirable or viable to meet this unit mix on all sites in the Borough and the wording of Policy H2 should allow flexibility on individual sites taking into account extant planning permissions and the form and character of development practical on that site. A very different housing typology will be deliverable in high density, highly accessible areas such as the Greenwich Peninsula as compared with more suburban parts of the Borough. Policy H2 should recognise and allow for this. We therefore suggest Policy H2 is amended as follows: A mix of housing types and sizes will be required in all developments including conversions. The mix of each site will be appropriate for its location and the character of the surrounding area, including the area's density and proximity to transport links. Highly built up or high density areas will not usually be suited to significant proportions of family housing, which will be directed to lower density areas of the Borough. Policy H3 " Affordable Housing We strongly object to the current wording of this policy. The imposition of a blanket minimum 35% affordable housing requirement without reference to any form of viability testing (to allow the affordable housing requirement to be reduced where it can be demonstrated that a requirement for 35% would render the development unviable) is fundamentally unsound. Introducing this flexibility is essential in order to create a pragmatic policy that actually encourages and enables the delivery of new housing, especially when market conditions are challenging. The wording as currently proposed is also not in conformity with Policy 3A.10 of the Consolidated London Plan 2008, which states that: Boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes It goes on to state that: targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements. It is clear that the Consolidated London Plan does not envisage setting fixed affordable housing requirements for individual developments with no flexibility incorporated into policy to allow the proportion of affordable housing sought to be adjusted in accordance with viability. The Draft Replacement London Plan adopts a similar approach at Policy 3A.13(B), having established at Policy 3A.12 that Core Strategies should set out strategic targets for the delivery	The desire for flexible application of policies is noted. H2 - The risk of using the wording as suggested in this submission is that it could potentially be used to support overly high density and small flats with little affordable housing. H5 – The Borough has expected a high standard of design in previous development plans and has continued to see significant growth in previous years. The need for additional housing

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							of affordable housing across a borough as a whole, rather than specific requirements for development on a site specific basis. Moreover the 70/30 tenure split between socially rented and intermediate accommodation proposed at 4.1.11 is not consistent with the strategic 60/40 split proposed by the Mayor in paragraph 3.59 of the Draft Replacement London Plan. Paragraph 4.1.12 Student Accommodation We strongly object to the suggestion in paragraph 4.1.12 that student accommodation should deliver a proportion of affordable housing. Providing additional student accommodation will remove students from the general housing market in the borough thus releasing additional accommodation for borough residents and it is therefore inappropriate and counter-productive to discourage it by imposing an affordable housing requirement. Student accommodation is a very different housing typology to standard residential accommodation. It is physically very difficult and often inappropriate to include an affordable housing element on the same site as it. Affordable family housing is particularly difficult to provide onsite alongside student accommodation. Student accommodation falls within either Class C2 or is sui generis, it is not Class C3 dwellings. We therefore strongly recommend that paragraph 4.1.12 be removed as it is unsound in its present form. Furthermore it is not in general conformity with the Consolidated London Plan 2008 which, at paragraph 3.53, is clear that student accommodation will not usually be required to provide affordable housing. Nor is it in general conformity with the approach being taken in the Draft Replacement London Plan, which states at paragraph 3.45 that affordable housing will not be required for student accommodation associated with identified educational institutions. Policy H5 â€“ Housing Design We have serious concerns about the numerous standards and criteria set out in Policy H5, as well as the ambiguous wording regarding how the criteria in (i) to (xv) will be considered. The reality is that the nature of individual sites and circumstances, including the type of accommodation being created and its location, will affect how many of these standards will be achievable. Not all development will be able to comply with all the criteria both set out within this policy, as well as the additional criteria that will arise from the Code for Sustainable Homes, Building for Life, London Housing Design Guide and Lifetime Homes. The policy should clearly and unambiguously state that these policies will be applied flexibly and pragmatically, and that compliance will be encouraged where appropriate rather than required in all cases. A significant proportion of the development planned in the Borough over the plan period will not be able to meet every aspect of the H5(i-xv) criteria and consequently it will not be possible to deliver the Borough's housing target if all targets are applied rigidly. We therefore suggest Policy H5 is amended as follows: New residential development, redevelopment, refurbishment or conversions will be expected to achieve a high quality of housing design and integrated environment. The Council will apply this policy flexibly, taking into account the key relationships between the character of the area, site location housing densities and the need to secure the delivery of 32,235 dwellings in order to meet the Borough's 15 year housing target. New residential development will be encouraged to meet the following standards where appropriate and practical:	can not be at the expense of good quality design. The supporting text to policy H3 now clarifies that student housing that is not robustly secured for student use is expected to make a contribution towards the provision of affordable housing. This is in conformity with the London Plan.
DCS43	Barbara	Reid					I agree with the statement, in 4.1.1, that we need to ensure that the appropriate size, type, density and affordability of homes are provided, and that the new housing is catered for with associated infrastructure. This hasn't been the case with recent developments in our area. The Sustainability Appraisal found that creating a greater mix of housing types and sizes will have positive effects by enhancing diversity of local character and integrate provision of family housing and family amenities such as schools, play areas and local shops. I hope this will be adhered to.	Noted - it is certainly agreed that it is important for housing to be matched by appropriate increases and improvements in infrastructure.
DCS69	Laurie	Baker	Eltham Society				The Society is pleased that PPS3 has changed the designation of back gardens as not being brownfield land and agrees with criteria in Policy H (c).	Noted
DCS45	Peter	Rice					live/work units should be encouraged use of redundant buildings not covered lift provision for 3 storey flats is uneconomic for developers LBG is mainly clay subsoil - permeable surfaces may not be practical	Noted. Lifts in 3 storey flats has been sought by Council for a number of years and achieve don many occasions. Other points noted.

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DCS71		Tilfen	Tilfen Land Ltd	Craig	Blatchford	Blue Sky Planning	Policy H2 sets out the proposed mix of housing the Council will seek in new developments. It indicates that a significant proportion of 3 and 4+ bedroom units should be provided. It is noted that the South East London Strategic Housing Market Assessment suggests that the target should be for circa 60% of units to be 3 and 4+ bedroom units and therefore this should be an overall aim for residential development in Greenwich. However, we suggest that the policy should acknowledge that the individual characteristics and circumstances of developments, including viability issues, should be taken into account when determining the housing mix. Therefore, a criteria based approach should be introduced to Policy H2. Policy H3 sets out the Council's aspiration for at least 35% of new houses to be affordable. The precise percentage, distribution and types will be determined by the particular circumstances and characteristics of the site. On the basis that the 35% affordable housing target is subject to the tests identified Tilfen Land do not object to Policy H3. However, the Policy is subject to possible review pending the results of the Affordable Housing Viability Assessment. We reserve the position to make further comments on Policy H3 should the Council propose an increase in the affordable housing provision of circa 35%. The explanatory text to Policy H3 states that the affordable housing provision should be split 70:30 social rented: intermediate housing. We note that this is more in favour of social rented than suggested in the draft London Plan. That being the case, we would suggest that the wording of paragraph 4.1.11 is amended to reflect the aspiration for a 70:30 split having regard to the particular characteristics and circumstances, including viability issues, of the site rather than it comprising a requirement Policy H5 sets outs the design aims for all housing development. In principle, Tilfen Land supports the Council's aspirations for high design quality and sustainability credentials. However, these need to be set in the context of viability and other factors to ensure a deliverable scheme. Placing too great a cost on development, particularly in those areas which are not as commercially attractive as others, may potentially prejudice the delivery of new housing, etc to the detriment of the overall Core Strategy. For example: ii) The aspiration for a Building for Life standard to be achieved is acknowledged. However, we would suggest that reference is made to both Silver and Gold standards iv) There is no over-riding need that would lead to the imposition of a general presumption against north facing units. If reference to north facing units is to be included at all, it should be expressed as an aspiration, not a presumption. xv) We would suggest that Code for Sustainable Homes is a more appropriate criterion than BREEAM. We note that the explanatory text refers to housing density set out in Draft London Plan Policy 3.4. We acknowledge that Policy 3.4 is a guide only having regard to other circumstances and site characteristics.	Policy H2 already generally covers what the submission wants to achieve with this policy without the need for additional criteria. Other comments including the need for flexibility in schemes to ensure they are viable are noted. The Core Strategy does not seek to over burden developers with design standards but this is balanced against the need to ensure that inappropriate development doesn't take place. H5 – the Borough has expected a high standard of design in previous development plans and has continued to see significant growth in previous years. The need for additional housing can not be at the expense of good quality design. Code for Sustainable Homes (CSH) is applied to new builds but BREEAM is appropriate for refurbishment as CSH does not cover this.
DCS77	Geoffrey	Belcher	Maritime Greenwich World Heritage Site				Policy H5 Housing Design The expression development will be expected to achieve a high quality of housing design and integrated environment is vague and open to interpretation. Recent housing schemes which were given planning permission under the 2006 UDP with similar policies have been of questionable design.	Noted The Council wants to see a high standard of design coming forward across the entire Borough.

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ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Policy Sections (Refer to sections 4 and 5) - Question 9: Housing (Refer to sections 4.1 and 5.1)**	**Council Response**
DCS60	Lawrence	Smith	Westcombe Society				Policy H1 New Housing. The target figure for new housing is too high to be sustainable or suitable without considerable improvements in the infrastructure, particularly public transport and social/health infrastructure. Commitment to making these infrastructure changes must precede investment in new housing (see question 6). The strain that such a large increase in housing would have on all aspects of life in the borough has not been adequately dealt with in the document. Reference is made, p63 for example, to possible increases in crime and pollution, but neither of these is addressed in sufficient detail or with any degree of confidence. Policy H2/3 Housing mix. In addition to a mix of housing types and sizes it is important to ensure that housing developments are sufficiently small and provide a good mix of social/affordable, privately owned and rented accommodation. Care should be taken to ensure that in order to achieve sufficient housing density, development does not rely on tower blocks. There should be mixed styles of housing as well as mixed provision (i.e. social/affordable/private and varying size to provide affordable housing suitable for families). Tower blocks produce social problems. It is not necessary to build high to be dense: architects have documented that terraced housing with small gardens is more socially acceptable but as dense as tower blocks due to wide spaces between tower blocks. Private open space provides more individual amenity than open spaces between tower blocks which can be faceless, empty spaces and/or wind tunnels. In some areas, particularly those with good access to Docklands and the City, single person/small accommodation in medium sized blocks might be appropriate but all flats should have balconies or terraces. Most 3 bed and above properties should be low rise with private gardens. Although there is an acknowledged shortage of affordable housing in the borough, this has traditionally been addressed through building large estates which lack amenities and transport. This often leads to social problems. It is important that affordable housing be provided within existing communities and with appropriate facilities and infrastructure.	Noted - it is certainly important for housing to be matched by appropriate increases and improvements in infrastructure. Support for Policies H2 and H3 is noted
DCS57	Judith	Cooke	Environment Agency				PROPOSED TEXT Policy H5 Housing Design xiii) The adoption of Sustainable Drainage Systems (SUDS) including landscaping of the environment around the dwellings in a way that provides for permeable surfaces; 4.1.29 The adoption of Sustainable Drainage Systems (SUDS) including landscaping with permeable surfaces is an important aspect of housing design as it moves away from traditional piped drainage systems towards solutions that mimic natural drainage processes. To implement these techniques effectively developers need to consider their use at the earliest possible stage.	Noted - Have moved the wording about permeable surfaces from H5 to DH1 as it is a design element for all development and not just housing.
DCS67	A.E.	Hart					I disagree there is going to be a shortage of affordable housing, unless the Borough does indeed allow the unprecedented continuation of building housing for an incoming population that has been described in the DCS. The rebuilt Ferrier Estate (Kidbrooke Village) and very many schemes already in progress or planned throughout the Borough will be sufficient for those already living in the Borough. Additionally there are a lot of in-filling, extensions, add-ons, conversions, garden-grabbing, etc, that cumulatively are increasing the housing stock on brownfield land and residential areas. The Borough should insist that council properties do not lie empty and could compulsory purchase privately-owned properties lying empty for occupation by council tenants. I do not agree with adopting the principle of conforming to the policies described in the DCS that could guide very large increases in population in a future development of the Borough, 2011 to 2027.	Noted There is already a shortage of housing in the Borough and the housing policies will work to ensure that the shortfall is remedied as much as possible over the plan period while delivering the necessary mix of tenures and sizes.
DCS78		Berkeley Homes	Berkeley Homes (Urban Developments) Ltd	Bob	McCurry	Barton Willmore	Policy H1: New Housing 4.1 The Draft Replacement London Plan (DRLP) (October 2009), states under policy 3.3 that Boroughs should seek to achieve and exceed the relevant minimum borough housing target. Table 3.1 in the DRLP states that Greenwich has a ten year housing target of 25,950 between 2011 " 2021, which is to be provided at a rate of 2,595 units per year. 4.2 However, while Policy H1 of the Council's Draft Core Strategy sets an average annual housing target of 2,595 up until 2021, it then sets a reduced annual rate of 1,480 units per year for the period 2020/21 to 2026/27. This is contrary to the DRLP which states under para 3.19: Table 3.1 only covers the period 2011 - 2021. As LDFs must provide 15 year targets, LDFs which come forward following publication of this Plan and before its replacement or alteration will not be covered for their full term by the current targets. The Mayor therefore commits to revising the targets by 2015/16. In order to provide guidance for any intervening period, LDFs should roll forward the annual targets in Table 3.1. 4.3 Therefore, draft Policy H1 is currently not in conformity with the DRLP and should be revised to ensure that the annual housing target of 2,595 is carried forward beyond 2021 until the Mayor has revised the Council's overall target in 2015/16. 4.4 These figures are also shown in Table 3.1 of the Draft Core Strategy and we expect to see these table amended in accordance with our comments above. Policy H2: Housing Mix 4.5 We object to the inclusion of a requirement in the policy for developments to include a significant proportion of 3 and 4+ bedroom units. 4.6 It is unclear from the policy what a significant proportion actually means and it does not provide the certainty required by developers to understand the specific requirements of the Council in determining	The Housing Mix policy addresses the significant need for family housing in the borough over the next 15 years. The need was objectively determined in the SEL Strategic Housing Market Assessment (SHMA). H5 – Agree that targets are ambitious but they are not overly burdensome.

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							planning applications. 4.7 Furthermore, the policy does not make any distinction between private and affordable housing tenures and this can have a significant impact on scheme viability. While it is understood from the South East London Strategic Housing Market Assessment (SHMA) that there is a demand for 3 and 4+ bedroom units, the demand for these units is likely to be higher in the affordable tenure than the private tenure. Enforcing a significant number of 3 and 4+ bedroom units in the private tenure will affect scheme viability as market demand for this size of unit is limited. 4.8 The policy should therefore be re-worded to allow some flexibility between the mix of units in private and affordable tenures to meet housing and market demand and take into account the financial viability of a development proposal. Policy H3: Affordable Housing 4.9 We support the approach set out in draft Policy H3. The percentage approach and 35% requirement is preferred to a numeric target and gives developers the flexibility to determine affordable housing levels, with the Council, based on the particular circumstances and characteristics of the site. 4.10 However, we would prefer to see the policy expanded to take into account the need to consider the financial viability of a development and the availability of public subsidy, in accordance with DRLP Policy 3.13. 4.11 We also note that paragraph 4.1.11 proposes a 70/30 mix of social rented and intermediate housing respectively, rather than being consisted with the Mayor's long term strategic target of a 60/40 split proposed in para 3.59 of the DRLP. We object to this and suggest that paragraph 4.1.11 is revised to ensure it is aligned with policy emerging from the DRLP. Policy H5: Housing Design 4.12 Part i - The draft policy states that housing associations and private developers will be required to achieve the following level of the Code for Sustainable Homes: "Code level 4 by 2011 Code level 5 by 2013 Code level 6 by 2016 4.13 Whilst we support the Council' s ambitions to improve the standard of housing construction and design across the borough, we would like to highlight that the Code for Sustainable Homes is being introduced as a national programme through changes to Building Regulations. Currently the national programme for the introduction of Code Level 4 is 2013 and not 2011, as required by Policy H5 (i) in the Draft Core Strategy. 4.14 The government's timetable is recognised as being extremely ambitious but reflects the results of detailed discussion and negotiation between Government, experts, NGOs manufacturers, developers and regulators over what is feasible for developers to achieve between now and 2016. 4.15 In fact, The Zero Carbon Compendium (2009), written by the NHBC Foundation, the Zero carbon Hub and PRP Architects clearly highlights how house builders in the UK are leading on this issue: Nowhere else in the world are people talking about zero carbon for both regulated and unregulated emissions as a mandatory target to be met by the housebuilders alone. (pg 44). 4.16 Therefore, given that the national programme for reducing carbon emissions is seen as one of the most challenging in the world, it is difficult to see how the Council could require the house building industry to exceed the national requirement. Currently policy H5 (i) sets requirements for percentage improvements over Building Regulations that are significantly in advance of the government's timetable for tightening Building Regulations in 2010 and 2013, leading up to the requirement for all homes to be zero carbon from 2016. 4.17 However, the Council has not demonstrated how it has access to any additional, special information to provide a justification or evidence base for setting higher carbon emissions and Code for Sustainable Homes targets than those being set nationally across the UK. 4.18 Therefore, Clause (i) of Policy H5 should be removed and a cross-reference to the government's definition of Zero Carbon Homes and the national programme for improving Building Regulations through the Code for Sustainable Homes should be added to the Policy. 4.19 Berkeley Homes is not opposed to trying to meet the national targets as a minimum, but is concerned that any additional requirements on top of the many other planning objectives in the Draft Core Strategy and Development Management Policies, along with the difficult economic climate we are currently faced with, would have a significantly detrimental impact on scheme viability and the deliverability of new homes across the borough. 4.20 Part ii â€" This part of the draft Policy requires new residential development to achieve Building for Life Gold Standard. Whilst our client is committed to achieving Building for Life Silver Standard, we feel that a requirement for all new residential developments to achieve the Gold Standard is too onerous. The policy needs to be more flexible to take account of site characteristics, the historic environment and other material considerations. We therefore suggest that part (ii) of Policy H5 is reworded to say: Seek to achieve the Building for Life Gold Standard. 4.21 Part iii (and paragraph 4.1.20) - We strongly object to the requirement for all housing development in the borough to have to meet the London Housing Design Guide. 4.22 The London Housing Design Guide has currently been adopted by the LDA and by the London HCA (from the 1st April 2011). However, on a strategic level (through the Mayor of London), the document does not have any planning status and does not apply to private housing development or affordable housing which is not grant funded. 4.23 Therefore, the strategic policy context does not currently exist to allow the introduction of the London Housing Design Guide for all tenures. We therefore consider Part (iii) of Policy H5 and paragraph 4.1.20 in the Draft Core Strategy to be contrary to the London Plan and DRLP and should be deleted. 4.24 Part iv Please see comments on Policy H2 above. 4.25 Part vi (and paragraph 4.1.22) This part of the Policy and the supporting text places a presumption against north facing units and single aspect units. Whilst this maybe a policy objective, the reality is that the characteristics of a site, its orientation and objectives to deliver a mix of uses will sometimes mean that north facing single aspect units are unavoidable. 4.26 Part (vi) of Policy H5 should therefore be amended to include the words where possible at the end of the sentence. Policy H(e) Children's Play Areas 5.1 Draft Policy H(e) requires residential developments to provide children's play areas in developments of over 50 family housing units. 5.2 Whilst we support the objective of providing children's play space alongside family housing, we consider that the draft policy needs to acknowledge that there will be circumstances where existing play facilities may already exist in the local area	The Borough has expected a high standard of design in previous development plans and has continued to see significant growth in previous years. H3 – Regarding the split of social versus intermediate rents, the Core Strategy has to be in general conformity with London Plan but can have differences on matters such as this. Other comments noted.

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							that can be used by a proposed development, or that a financial payment towards the upgrade and long term maintenance of an existing play area is more appropriate. 5.3 The policy should be reworded to take account of these comments.	
DCS47			Tesco Stores Ltd		Russell	Nathaniel Lichfield & Partners Ltd	On Affordable Housing, the policy should make explicit reference to the agreed level of affordable housing on individual sites being the subject of a viability assessment, where less than 35% provision is to be brought forward, rather than the vaguer requirement to have regard to the characteristics of the site. Affordable Housing policy must also maintain flexibility to respond to changing circumstances and funding regime for affordable housing provision, if it's provision is not to act as a restraint to the supported high-growth strategy in the Borough. Overtly prescriptive housing design policies are considered excessively detailed for inclusion within a Core Strategy and again a potential restraint to the high-growth	H3 – It is important that the Core Strategy includes a robust policy on affordable housing so that the Borough can meet the need for this type of accommodation over the plan period. The figure in the submission version of the policy is based on the Affordable Housing Viability Assessment, undertaken by consultants BNP Paribas. H5 – The Borough has expected a high standard of design in previous development plans and has continued to see significant growth in previous years. The need for additional housing can not be at the expense of good quality design.
DCS81	Linda	Hodgson	Heathway Residents Association				4.1 Housing p62 4.1.2 'What you told us ..' We would like to see the sentiment of the first bullet point rephrased as 'Housing density increase should be resisted in areas where public transport is relatively lacking and unlikely to improve in the near term' Density p63 4.1.32 This is such an important issue for Conservation Areas, that it merits specific mention here that density can and generally should be lower in these areas Policy H(c) Backland and Infill Development p140 We very much support this policy, particularly items iv and v	The 'what you told us' section does not need to be changed as this won't be in the submission version of the core strategy. It was for information in the draft version. Density - Agreed and

	Consultee			Agent				
DCS87	Densitron		Question 9				PPS3 places specific focus upon the 'delivery' of sites and maintaining a continuous supply of land for residential development. It is evident from the Annual Monitoring Report 2009/2010 that since the adoption of alterations to the London Plan in October 2008, The Council have actually delivered only 2,115 new homes as 'completions' against a target of 6,030 new homes for the period 2007/2008 ¬2009/2010 . This represents only 35% of the overall target to date and a significant shortfall against a regional policy framework. Furthermore, this shortfall is likely to only be exacerbated further over the next 2 -3 years in light of the current market conditions. The ever increasingly acute need is also pronounced for larger, family accommodation in Greenwich. Indeed PPS3 and the London Plan, place an emphasis on delivering a range of housing types, whereas it is also evident from the 2009/2010 Annual Monitoring Report that houses represented less than 15% of completions in 2009/2010 , furthermore only 17% of all completions in 2009/2010 were for family housing of 3 or more bedrooms. Whilst it is recognised that the Council have a strategic target to deliver 90% of all new homes on previously developed brownfield land, it is inevitable that previously developed sites in urban areas are subject to greater physical and financial constra ints on viability. As a result, the sites identified in the Strategic Housing Land Availability Assessment (SHLAA) are unlikely to be able to provide any significant contribution to the number of family sized dwellings or the number of houses, contrary to the need to provide for a range of housing types, sizes and tenures. Furthermore, previously developed land is inevitably subject to greater tests of viability which could result in an even more pronounced shortfall of housing completions. Against this backdrop, and following the completion of a detailed Open Space Assessment, the Council should give consideration to the release of landlsites, where they can be shown to clearly fail in performing the role of MOL. This would assist in providing some land which can 'deliver' a wider range of accommodation, particularly houses and family homes, than has recently been completed. Notwithstanding the above, proposed amendments to the London Plan, would in fact increase LB Greenwich's housing target to 2,575 dwellings per annum. This represents an additional 5,650 new homes over and above the adopted target for the period 2010/2011 -2020/2021 . If this figure is supported by the Inspector in drawing his conclusions from the Examination in Public, it will place an even greater emphasis on the		Appendix 9 Housing Trajectory demonstrates that RBG has a 5 year supply of deliverable housing and a 15 year supply of developable housing. It is not considered appropriate to release MOL for housing development. Please also refer to responses to questions 13 and 19.

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								an additional sentence has been included at the end of the paragraph. Support for Hc is welcomed.

			need to 'deliver' additional housing in the Borough. In accordance with policy aspirations, the Council should therefore seek to allow, up to 10% of all new housing to Greenfield land, that can be demonstrated to not perform a strategic role, for example as MOL or playing fields. This should be underpinned by undertaking a review of existing MOL boundaries and releasing land which is not performing that role, for housing, in particular, larger family accommodation. It is therefore Densitron 's request that the Site be reviewed in light of the above information and it's removal from MOL designation be considered.	

DCS85	Frank King	Question 9	4.1.2. "Housing increased in areas that have good public transport access" This is not so in the Charlton area. The main road has good bus routes, but not the riverside and none can be added without a major road being built. The other means of transport are not sufficient, one rail station only and that with insufficient services. "The waterfront area is appropriate for high density housing". No it is not! The congestion which will be added to the existing bottlenecks at Greenwich and the Ferry is totally unacceptable and no plans are in place to alleviate the problem. "The preferred target for affordable housing is 35%". I agree that this should be the absolute minimum requirement, but I think that 50% should be the target for all developments. "Affordable targets applied flexibly". NO ! The minimum possible should be 35% with a preferred target of 50% wherever possible. "Dwellings with 2, 3 and 3'" bedrooms should be the priority". This is true, but wherever possible 4 , 5 and 6 bedrooms should be aimed for. When the Council itself builds housing, it should be built in low or high rise, but never stand alone houses with 3, 4, 5 or 6 bedrooms because they will quickly be bought-up by tenants. The Council buildings should be built with 5 or 6 bedrooms on the ground and first floor with 2 or 3 bedrooms on the second floor and above. This would prevent the sale of these properties, allowing only for leasehold , thereby remaining Council stock in the long run and providing some income during the leasing period in the form of service charges. In any event Council buildings should not exceed 11 stories at the most, with 4 or 5 stories being the preferred height, with some space between blocks and no walkways or alleys (viz. no rat runs). 4.1.6 . If so where will you find space for the new businesses and jobs that you will need? 4.l. 7. Tenancies in houses and flats with 4 , 5 and 6 or 6 + bedrooms must only be granted on a year by year basis with the tenants being required to move when they cannot justify the number of bedrooms. 4. 1 .10. The policy MUST provide to address the whole of the present backlog as well a arising need. 4.l.13/14/ 15. and Policy H4: I fully agree that sites, as set out in H4, should be provided as needed and where they are suitable. 5.l.1.: We all agree that there is a shortage of housing in Greenwich. One barely tapped resource is rooms/flats above shops. These could easily be brought into use by charging rates on empty rooms and assisting those shop keepers and shop owners to convert these empty rooms into accommodation by rate relief, that is to say the rates that you pay" now imposed could be suspended for one or two years, or more if the costs of conversion were more, together with improvement grants which they could already apply for. In the long run the Council would receive the rates that are at present not being paid and have many more flats in use. If shop keepers or owners appeal against rates being imposed on these empty rooms they could only do so on two grounds: Firstly: that there is no possible access because of security issues, (Banks etc.) where valuables or sensitive documents are kept on the premises (Doctor's etc.). Secondly: That the rooms in question are unsuitable for human habitation. This would have to be something really serious which could not be remedied with investment. There is another group of buildings which should be brought into use. These are properties which have been left empty for a year or more. Again these should be charged Rates until they are developed or converted. A prime example of this sort of building is the Old Polytechnic School right in the middle of Woolwich. It is a disgrace that this building and the site around it should be left as it is, derelict and an eyesore when this land is badly needed. Also, as much help as possible should be given to provide good quality Bed & Breakfast accommodation in the Borough to encourage visitors and tourists. There are many pubs and large houses that could be developed for this purpose with a little Council encouragement, not so much in money terms, but simply by contacting these property owners and pointing out that they would have a glut of tenants next year which would pay for their trouble in opening these rooms up, and that the Council would help them with planning permissions. Policy H5: I am in almost complete agreement with Policy H5, with a couple of minor notes: (i) An attempt should be made to reach Code Level 6 by 2014 where possible. (vii) Balconies are pigeon havens and I know from personal experience that the problems far outweigh the benefits. Open Balconies should not be provided above the 3rd floor for this reason. (xii) Where there are disabled or Wheelchair accommodations, there must be a Fire Lift provided if above the 2nd floor. (xiv) Waste recycling facilities should be provided for all four types of waste inside blocks of flats, so that the residents can separate their waste easily and cannot claim that the bins are too far and it is too much trouble to get to them. In my block there is only one waste chute on the landing, but the cavity where this chute is located could easily accommodate three similar chutes in the same space. 4.1.27. One point that I would make here is that a ceiling height of 8 feet 1 inch is essential. Again from personal experience, some fitted kitchen units, some wardrobes and some bookcases are 8 feet high, and it is extremely irritating that these will not fit into my flat because the ceiling is only 7 foot 11 '/4 inches. The original design was, almost certainly slightly over 8 feet, but when the floor tiles and plaster were added, the height was reduced below 8 feet. 4.1.29. This is an extremely important issue. Wherever possible permeable surfaces should be the norm and all planning permissions, especially those for driveways, should require permeable surfaces. In due time I hope that all roads and pathways could become permeable, or at least soak-away, when newly constructed.	The Charlton Riverside masterplan SPD encourages the development of transport infrastructure. The Affordable Housing Viability Assessment determined that 35% of new dwellings should be affordable. Larger family housing is encouraged by Policy H2 Housing Mix. The type of tenancy offered is not within the remit of the Core strategy. There are currently two hotels under construction in Woolwich and one more with the benefit of planning permission. The Mayor's Housing SPG private open space is required in all new housing developments. Policy H5 requires lifts in all developments of three or more storeys. Waste recycling on each development is assessed by the Council's Waste Services. The standard for floor to ceiling heights is set out in the Mayor's Housing SPG. For habitable rooms the standard is 2.5m. This level of detail is not appropriate for the Core Strategy.

Question 10 – Economic Activity & Employment – Do you have any comments?

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Economy - Question 10: Economic Activity and Employment (Refer to sections 4.2 and 5.2)**	**Council response**
DCS4	Lucy	Owen	Port of London Authority				Economic Activity and Employment: The text relating to Economic Activity and Employment needs to be reviewed to provide consistency and to accord with London Plan policy. In the introduction to economic activity and employment on page 25 reference is made to under-used and vacant industrial land in the Borough. It is stated that it is important to make more effective use of the industrial sites, particularly at Charlton Riverside and Greenwich Peninsula West. Whilst the PLA has no objection to more effective use being made of industrial sites, it is important to make it clear that the Borough's safeguarded wharves are protected for cargo handling uses and therefore any use of these sites will need to comply with the requirements of policy 4C.9 of the London Plan. This matter is picked up in a number of other places throughout this consultation response. Policy EA4 Strategic Industrial Locations: This protects Charlton Riverside (part)/Aggregates for open yard aggregates, crushing and scrap uses and protects the area for continued aggregates and rail freight use. Whilst this reference is welcomed, the wharves within the area (Angerstein and Murphy) are safeguarded wharves and they are protected for cargo handling uses. Additionally, does this designation include Riverside Wharf which would also appear to be within the Charlton Riverside? The PLA would assert that as a safeguarded wharf Riverside Wharf should also be protected through policy EA4 for cargo handling uses. The boundary of the Greenwich Peninsula West SIL needs to altered and the extent of the SIL designation widened to include the safeguarded wharf Tunnel Glucose. No evidence has been put forward that justifies the remove of Tunnel Glucose from the SIL and it would be contrary to London Plan policy which protects safeguarded wharves for cargo handling uses. Additionally it is unclear what the planning situation is for the Borough's other safeguarded wharves. For example there is no reference to Brewery or to Victoria Deep Water Terminal are these located in SILs and therefore covered by policy EA4? Paragraphs 4.2.15 and 4.2.16 need to be re-written and widened to include the importance of all of the safeguarded wharves within the Borough and to highlight how the wharves and protected for cargo handling through policy 4C.9 of the London Plan. It should also be made clear how development next to or opposite safeguarded wharves needs to be designed to minimise the potential for conflicts of use and disturbance. Policy EA5 Tourism: The PLA welcomes in principle the support given to a cruise liner terminal at Enderby Wharf and to ensuring that major tourist facilities are well served by pubic transport including the use of the River Thames. As the Council will be aware, policy 4C.7 of the London Plan encourages the development of new facilities that increase use of the Blue Ribbon Network for passenger and tourist traffic. Policy EA(b) Safeguarded Wharves: This policy is concerned specifically with safeguarded wharves. It seeks to safeguarded the Borough's safeguarded wharves for river based cargo handling. Whilst the policy refers to viability, it	Policy IM5 states that Angerstein, Brewery, Murphy's, Riverside, Tunnel Glucose Wharves and Victoria Deep Water Terminal as defined on the Proposals Map are safeguarded for river-based cargo Handling. London Plan Policies form part of the development plan for the Borough and therefore do not necessarily need to be repeated or cross referred to. However, a minor amendment to the text has been agreed and the policy now refers to 'viable or capable of being made viable'. The Council's long term aspiration to remove the safeguarding of Tunnel Glucose Wharf and Riverside Wharf was set out in the recently adopted masterplans for Charlton Riverside and Greenwich Peninsula West. Reference is also made in the support text to Policy IM5. Although the release of certain wharves is the Council's long term aspiration, the safeguarded status of these wharves will be respected and the policy provides strong protection for them until such time as the Government de-designates them. Any proposal for a site adjacent to a safeguarded wharf would be assessed on its merits but the other policies in the document sufficiently address concerns over design etc. Additional wording for sites adjacent wharves is not necessary. The Core Strategy does not need to 100% reflect the London Plan, it need only be in general conformity with it, which these policies are. The Council will continue to work with the PLA and other relevant stakeholders regarding the Council's ambitions for Charlton Riverside and Greenwich Peninsula West. This Core Strategy is an important policy document helping to ensure that good quality development comes forward.

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							states that alternative uses will only be considered if the wharf is no longer capable of being made viable for river based cargo handling. This does not strictly reflect policy 4C.9 of the London Plan. The text should be amended to read viable or capable of being made viable. It is questioned why the policy has been cherry picked from the London Plan. For example, there is a reference to 'exceptionally for a strategic proposal of essential benefit to London.' This is in the supporting text to policy 4C.9 and not in the policy wording itself. The supporting text to policy 4C.9 also says that the exceptional strategic proposal should be of essential benefit for London, which cannot be planned for or delivered on any other site in Greater London. Given the Council's aspirations for some of the land within the plan area which is located next to or opposite safeguarded wharves, text should be included in policy EA(b) that development next to or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance.	
DCS5	D	Andrews	Brittannia Assets LTD	John	Collins	DHA Planning	I write on behalf of our client, Britannia Assets Ltd, who own a site at the VIP Industrial Park in Charlton, as identified on the aerial image below (see attached document). The site currently comprises large industrial units and a yard area, such that development is of a low density and it is considered that the site would be capable of operating at a far greater intensity than it does currently. The site is immediately adjacent to an existing, small area of residential development to the north with extensive retail development to the south and further industrial development surrounding. It is also just 350m from the riverside. The Draft Core Strategy recognises that there is a significant level of underused industrial land in the vicinity of the VIP Industrial Park. Having reviewed the Draft Core Strategy and Proposals Map, I am aware that my client's site falls within the 100 hectare Charlton Riverside Strategic Development Location area, as designated under Draft Core Strategy preferred policy EA2. I note that this proposed development currently comprises a residential led mixed use scheme including 6000 new homes which are to be delivered by 2031, as well as education facilities, commercial development, retail development and community facilities. Britannia Assets support preferred policy EA2 and consider it is more appropriate than the alternative option which proposes further industrial land at Charlton Riverside, with limited transfer of industrial land for mixed use development and with fewer homes being provided than as proposed by the preferred strategy. Britannia Assets agree that the preferred option will make the most efficient use of the underused industrial land which will accommodate a higher percentage of the projected population growth. However, my client does wish to object to the proposal to reduce the amount of out of town retail provision in this area. I note from the Draft Core Strategy that the regeneration of the Charlton Riverside area is dependent upon the proposed increase in public transport in the waterfront area. The existing retail to the south of our site is in our view only just at a critical mass which makes it a destination in its own right. In our view, it is therefore important that retail aspects are included within the regeneration of Charlton Riverside, and that existing retail is not reduced, in order to ensure	Support for Policy EA2 welcomed but the AAP for the area is no longer proposed, the SPD adopted in April 2012 provides the detailed planning guidance for the area removing the need for an AAP. Council officers will work with all relevant stakeholders in regenerating Charlton Riverside. The Council will continue to seek to limit the overall extent of out of town retail at Charlton Riverside and promote Town Centres as the primary location for retail uses.

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							that the proposed public transport improvements will be sustainable. Indeed in our view the area should sensibly be extended to accommodate other retail uses on site such as that owned by our client in order to ensure that the site provides an appropriate range of retail services to support the new mixed use allocation. This will minimise vehicle trips and maximise sustainability. I note that an Area Action Plan or Opportunity Area Planning Framework will be prepared to guide development at the Charlton Riverside site. Britannia Assets Ltd would like to be involved in the development of this document and we would therefore ask you to add us to your database for all future consultations. I trust that these submissions will be taken into account in the development of the Core Strategy.	
DCS10			CIS Ltd	Richard	Blyth		Policy EA2 Charlton Riverside: We welcome the vision and confidence in the area being expressed by the Council (and the Mayor of London). We support the vision of Charlton Riverside becoming a mixed-use urban quarter. There is a lot of underused or derelict land within the area despite its potentially attractive riverside location with great views; and the environmental quality is poor. This land should be put to good use to address housing shortages and improve the environment. However we are concerned that the wording of the supporting paragraphs (4.2.7 - 4.2.9) may overlook some of the issues to be addressed in arriving at the vision. For example 'there will be an intensification of use of the remaining employment land resulting in no net loss of employment across the waterfront area'. There are a number of good quality single-storey industrial units in operation across the area. It would be counterproductive to displace these. Therefore we do not see how 'intensification' will take place. And 'redevelopment' of this area provides the opportunity to reduce retail use. Again, there are a number of successful, trading retail park enterprises, especially towards the western end of the area. These provide valuable, if low-density, employment opportunities for local people and a valued service to a variety of customers. Has the Council investigated whether these businesses wish to move away? Where would they go? What would be impact on local employment and retail opportunities if they did? PPS12 paras 4.27-4.29 encourage involvement of landowners and developers in the formulation of core strategies. We think that to set particular directions for the Strategic Development Area (eg reduction in retail) before having explored what opportunities are feasible from that angle might lead to the proposal being ineffective. In general the vision for the Strategic Development Location should be informed by an understanding of the current successful businesses in the area and their future potential, as much as by the situation regarding underused or derelict premises. To hold up the process of finding new uses for underused and derelict land by desiring a comprehensive redevelopment solution may result in limited overall change and the continuation of the present situation. A more practical solution may lie in looking for opportunities for land swaps within the Strategic Development Location, such that retail and industrial uses	Support for the vision and confidence is welcomed. Policy EA(a) does not apply to sites within Charlton Riverside and Greenwich Peninsula West Strategic Development Locations as these areas are undergoing significant change in line with the respective masterplans. This has been clarified in the support text to Policy EA(a). The Council will continue to seek to limit the overall extent of out of town retail at Charlton Riverside and promote Town Centres as the primary location for retail uses. Council officers will work with all relevant stakeholders in regenerating Charlton Riverside

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							can be more concentrated within certain sections of the area, and new uses introduced into other areas. However this will not necessarily result in intensification of use, but should secure the aim of no net loss of jobs. Policy EA(a) : Local Employment Sites We support the retention of valuable local employment sites generally. However the Core Strategy should make it clear that this policy will not apply to Strategic Development Locations.	
DCS23	Nigel	Abbott	Cluttons LLP				In relation to paragraph 4.2.6, on behalf of our clients Halliard Property Co Limited, we wish to support this requirement for future development proposals on sites that should contain a mix of uses which will continue build upon the various schemes and proposals that already have planning permission or have been built out in Creekside. We have provided details in our response to paragraph 3.3.29 (Question 6) of our clients site located at Lower Norman Road within Creekside which we consider is suitable for higher density residential-led mixed use development to complement the existing and permitted schemes located elsewhere in Creekside. In relation to POLICY EA(a) Local Employment Sites, on behalf of our clients, Halliard Property Co Limited, whilst we can appreciate the reason for the inclusion of this policy to protect against the loss of local employment sites, we wish to confirm with the Council that this policy will be not be applied to our clients site at Phoenix Wharf in Lower Norman Road which is currently designated under Proposal J7 in the adopted UDP for light industrial / small business units / office purposes. The site fronts Deptford Creek which is identified under paragraph 3.3.29 of the Draft Core Strategy as being suitable for mixed use, including housing and floor space for offices or creative industries, and that reflects its Creekside location. This is a proposal that we support and the tests set out in Policy EA(a) would be incompatible with the desire to secure mixed use redevelopment of Deptford Creekside. We do not consider that this request would have a significant impact upon the overall effectiveness of the policy that would continue to apply to other local employment sites located throughout the remainder of the Borough.	Support welcomed. This policy is not applicable to sites identified in the Site Schedules Proposals if the uses specified do not include employment uses. This has been clarified in the support text to Policy EA(a).
DCS24	John	Franklin	Greenwich Society				STRATEGIC POLICIES Para 4.2.1 Economic Development: The Society welcomes these broad objectives built on the basis of economic regeneration and the reduction of poverty in the Borough. A planned increase of 21,000 jobs by 2027 is predicated on the growth in the leisure, hospitality, tourism, creative and digital sector focussed on town centre regeneration, West / East Greenwich redevelopment and the North Greenwich peninsula. The pattern of economic development is based strongly on public sector employment, typical of an economy that has higher unemployment rates and a lower median income than other London Boroughs. Tourism and retail are particularly relevant for SE10. Reliance on local SMEs and public sector job funding are the core mechanisms of economic growth in the Strategy. Policy EA1: The focus on Town Centre improvements and tourism in Greenwich SE10, whilst recognising the need to meet local resident's needs, is welcomed, and the Society will be pleased to provide resident input on this at future consultations. In the case of East Greenwich an increase in housing stock of 645 houses through the Heart of East Greenwich development will increase economic activity	Support for the broad objectives is welcomed. The support for and acknowledgement of the value of the schemes at Heart of East Greenwich, Enderby's Wharf and Lovell's Wharf is welcomed. Council officers will continue to work with developers to ensure schemes are delivered soon after receiving planning permission. Economic growth is a key element of the Core Strategy and the Council has and will continue to work hard to ensure that there is improved access to local good quality jobs in the borough.

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							coupled with an enhanced provision of Council services. The time frames suggested for this for 2011-16 reflect the current economic restraints, but the Society urges that work get underway urgently as the site has remained dormant for some years. The redevelopment of waterfront sites at Lovells, Granite, Babcock and Pipers wharf is assumed to generate 607 homes by 2014. Enderby's Wharf redevelopment as a cruise liner berth, hotel and housing complex underpins the reliance on tourism as a key development driver in the Greenwich SE10 context. The reliance on small to medium enterprises as a mechanism for economic growth will require more business-friendly Council policies linked to the charges for Council services, development and planning policies, and business support through education and training of the local work force, either through re-skilling of the unemployed or better apprenticeship opportunities, as the Borough has higher than average youth unemployment. Improved transport links are seen as key to this, and the Society supports the need for more effective North / South links. A case study of these could build on the movements during the Olympics between Stratford and Greenwich, used during the Games. The creation of a District Centre at North Greenwich and a new employment hub at Greenwich Peninsula with high quality office and leisure floor space should encourage further inward investment. This is welcomed by the Society as the residential offering is diversified and linked to major transport nodes. Policy EA3 Greenwich Peninsula West: Whilst regretting loss of industrial land in this area, we accept the changes in land-use demand, and we have already warmly supported the proposed cruise liner terminal development at Enderby Wharf. The extension of this mixed-use urban development to the land to the north up to Morden Wharf, as a combined Strategic Development Location is supported, and the preparation of an Area Action Plan (or Opportunity Area Planning Framework) would be welcome. However, it has to be pointed out this is a little late as planning approval has now been given for the Enderby Wharf development, which shows little link with the site to the north. Policy EA5 Tourism: We also support an increase in employment opportunities using existing sectors such as retail, leisure, hospitality and tourism, particularly in Greenwich Town Centre and on the Peninsula. Council should consider innovative forms of skill development drawing on the substantial institutions such as the University to offer 'second chance' educational programmes for local people. However the underlying assumptions to enable these outcomes are largely outside the Borough's control. The provision of improved transport links is subject to central government funding and support, most notably with Crossrail. The existing travel patterns of car use and work outside the Borough, coupled with lower business densities, will be difficult to alter in a constrained economic environment. Major redevelopments of existing sites are dependant on general economic conditions and sentiment. Greenwich is not the only borough seeking to secure these so the Borough will need to ensure that inward investment is attractive. DEVELOPMENT MANAGEMENT POLICIES Policies EA(a) to EA(c): These policies are built on a very narrow range of economic options. The	

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							redevelopment policies for certain sites and wharves outlined in 5.2., within a criterion of employment viability, mean that development will be driven by major projects, such as Enderby's Wharf, with long development timeframes and the risk of significant local disruption over a considerable period of time, especially on the waterfront. The Society is keen to ensure that planning policies for West and East Greenwich will respect the existing resident mix and ensure a balance between new development and road and rail infrastructure. Traffic pinchpoints on Trafalgar Road/ Vanbrugh Hill need to be considered. The Society agrees with the proposals to make greater use of the river for freight transport as this may be one means of overcoming these. Para 5.2.4 dealing with Pubs reflects their role in tourism and SME development outlined in the Strategic policies. We would support this. Pubs are a strong feature of Greenwich SE10 life and act as a form of social and community interaction as well as providing local jobs. Para 5.2.6 relating to encouraging great skills development is welcomed by the Society and strengthening the role of GLLaB is an effective mechanism.	
DCS25		Waite					Improvements will depend on provision of infrastructure, which may or may not happen. Improving educational attainment is also crucial: but although you can take a horse to water, it will not always drink. This is a house of cards structure; and if it all comes tumbling down, Greenwich will be worse off than it is already.	Comment noted and infrastructure is certainly important to achieving good quality development. No changes necessary as a result of these comments.
DCS29		Mayor of London	Greater London Authority				EA1 Seek clarification regarding statement that 'The development of new urban quarters at Charlton Riverside and Greenwich Peninsula West along with the planned intensification of existing employment land' and how this will be consistent with the overall economic, employment and industrial land policies of the London Plan. The development area sections suggest substantial release of industrial land. Further discussions with the borough would be welcomed on this matter. EA2 Non-conformity with London Plan. The policy refers to a mixed use urban quarter on land currently defined as Charlton Riverside SIL in the London Plan. Residential development is not appropriate within SIL and would be non-conformity with the London Plan. The Policy should refer to the existence and continuation of Strategic Industrial Location at Charlton. It is accepted that there may be some scope for consolidation of the SIL at Charlton, in particular where there are non-industrial uses present (such as the out of town retail uses), but this should not represent a substantial release of industrial land. The scale of industrial land release and SIL reduction implied in Proposal Map changes Maps 1 and 3 has not been justified and would exceed the benchmarks for industrial land release. Following release of Enderby Wharf there is very limited scope for release of industrial land in Greenwich to 2021 as indicated in monitoring (LDA Industrial Land Baseline 2010) against the borough and sub-regional benchmarks for industrial land release in the Industrial Capacity SPG. The borough of Greenwich is classified in the adopted Industrial Capacity	Subsequent to this consultation, the Council and the GLA have met on several occasions to discuss the proposals in the Core Strategy and agree a way forward. The proposed release of industrial land was not of the extent that the GLA initially believed that it was and since the draft core strategy was published several meetings have been held with the GLA to clarify it. Also, an Employment Land Review has been prepared which supports the proposed release of some industrial land at Charlton Riverside and Greenwich Peninsula West. There has been significant movement on issues of non-conformity since the draft was published, amendments to SIL are now fully justified and Proposals Maps have been revised.

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							SPG and the DRLP as lying within the limited category for industrial land release with an indicative benchmark of 15ha for the period 2006-2026. Recent evidence indicates that a total of 14.4 ha of industrial land has already been released in Greenwich 2006-2010 (source: URS/DTZ London Industrial Baseline, LDA/GLA 2010). The recent proposals at Enderby Wharf (3.6ha) would increase the level of release in Greenwich to 18ha, marginally above the 20 year benchmark. In the wider South-East sub-region consisting of the boroughs of Bexley, Bromley, Lewisham, Southwark and Greenwich, a total of 53.8ha has been released over the period 2006-2010. This lies well within the 2006-2026 benchmark of 146ha but there are already emerging proposals in other borough LDFs within the sub-region for a further 97ha of industrial land release (not including Greenwich) over the planning period which, when added to the 53.8ha already released, would exceed the sub-regional benchmark by about 5 ha. Taking these borough and sub-regional factors into account the supply-demand balance of industrial land to 2026 is becoming increasingly tight and suggests that further substantial releases in the borough to 2026 should be avoided. The policy refers to maintaining employment levels in the Waterfront Area whilst this is important, the management of industrial land release must also consider the needs to accommodate industrial uses which support London's functional needs (eg for logistics, waste, recycling). There are also concerns with regard to likelihood of conflicting land uses in close proximity to safeguarded wharves (see comments specific to safeguarded wharves). The GLA would welcome further discussions with Greenwich on this matter and to consider the outputs of local employment land reviews. EA3 and Proposals Maps changes 2 and 4 Non-conformity with London Plan. The policy refers to a mix of residential, leisure and commercial uses on land currently defined as Greenwich Peninsula West SIL in the London Plan. Residential and leisure development are not appropriate uses within SIL and would be non-conformity with the London Plan. The Policy should refer to the existence and continuation of Strategic Industrial Location at Greenwich Peninsula West. The scale of industrial land release and SIL reduction implied in Proposal Map changes Maps 2 and 4 has not been justified, is conflict with LP policy and would exceed the SPG benchmarks for industrial land release. Following release of Enderby Wharf there is very limited scope for release of industrial land in Greenwich to 2021 as indicated in monitoring (LDA Industrial Land Baseline 2010) against the borough and sub-regional benchmarks for industrial land release in the Industrial Capacity SPG (see detailed comments above with respect to Policy EA2). There are also concerns with regard to likelihood of conflicting land uses in close proximity to safeguarded wharves (see comments specific to safeguarded wharves). The GLA would welcome further discussions with Greenwich on this matter and to consider the outputs of local employment land reviews. EA4 and Proposals Maps Changes 2 and 4 Although the policy as written is in conformity with the London Plan, the specific area proposed to be designated as Strategic Industrial Locations in Proposals Maps changes Maps 3 and 4 represent Non-conformity with London Plan. The scale of industrial land	

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							release and SIL reduction implied in Proposal Map changes Maps 2 and 4 has not been justified, is conflict with LP policy and would exceed the SPG benchmarks for industrial land release. There are also concerns with regard to likelihood of conflicting land uses in close proximity to safeguarded wharves (see comments specific to safeguarded wharves). The GLA would welcome further discussions with Greenwich on these matters and to consider the outputs of local employment land reviews.	
DCS33	Caroline	Evans					The draft refers to creating a 'cultural node' or a 'cultural quarter' in what 3.3.29 calls 'The Creekside Strategic Development Location'. This area, Opportunity Area 7 in the London Plan, straddles the Greenwich/Lewisham border. If the aim of building up 'a cluster of creative and cultural industries' is to be realised, then the two Boroughs will need to co-ordinate their employment-creating initiatives, through some sort of neighbourhood plan. This co-ordination can most sensibly be mapped out by a joint Greenwich - Lewisham Supplementary Planning Document for OA7.	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.
DCS34	Palvinder	Banwatt	Charlton Central Residents Association				5.0 Employment, Education, Learning and Development CCRA welcomes the proposals for, in excess of 20,000 new jobs by 2027. This will lead to a reduction in the levels of out-commuting for work and will go some way to halt the decline in industry in this area. We are concerned that the emphasis for these jobs appears to be primarily in the retail, leisure and hospitality sectors. There is inadequate information regarding the development of the digital, low carbon and advanced manufacturing industries and the types of opportunities they will afford. We feel that a proactive approach should be developed to attract a broad range of industries into the area to offer local people more choice and greater opportunities to develop high level skills. This will also support the vision of creating more apprenticeships for young people, although we would like to see it extended to include adults. We feel that it would be helpful to revisit the alternative strategies for the potential use of the land	The recently completed Employment Land Review provides more analysis of the Council's existing employment land and sets out proposals for the best use of employment land in the borough going forward. The Infrastructure Delivery Plan assesses the need for additional school places this is covered in the support text to Policy CH1.

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							along the riverfront and have a higher proportion available for industrial use. The strategy highlights the need for more primary education places and the eventual requirements for additional secondary accommodation to meet the demands of a growing population. Whilst the strategy makes reference to ensuring adequate educational facilities it lacks the details of where such amenities will be located. It is unknown whether due consideration has been given to the additional implications for associated services and infrastructure for school routes. The commitment to building a university technology college and other skills centres is welcomed. However, the location of these amenities requires careful consideration. Charlton currently has six primary schools to meet the needs of the local population; one, Fossdene School, is within the CCRA area. There is currently no secondary provision in Charlton. Our understanding is that plans to reintroduce a secondary school in Charlton have long been on the agenda yet there is no firm commitment in the Core Strategy to make this happen. With the proposed Charlton Riverside development, the demand for an additional school in the area will increase. The statistic of only 25% of the Greenwich population with qualifications beyond GCSEs is worrying and, coupled with the statement in the spatial portrait of insufficient capacity to meet the post-16 demand, we feel that the strategy should have increased focus on adult learning and development.	
DCS36		LXB Retail Properties PLC	LXB Retail Properties PLC	Lucy	Eady	WYG Planning	LXB support Policy EA1, including the development of new urban quarters at Charlton Riverside and Greenwich Peninsular West with the planned intensification of existing employment land. LXB however recommend that the third bullet point of Policy EA1 be altered to read: 'Increasing employment opportunities in existing sectors such as retail, business services, leisure, hospitality and tourism and the creative and digital sectors, particularly in Greenwich and Woolwich town centres, Charlton Riverside and on the Peninsular'. LXB recommend that Policy EA2 be altered to read as follows: 'Land at Charlton Riverside is allocated as a Strategic Development Location for a new mixed-use urban quarter, as shown on the Proposals Map. Employment will be consolidated to maximise the use of land whilst maintaining employment levels in the waterfront area. There will be a consolidation of the out of town centre retail in this area. An Action Area Plan Opportunity Area Planning Framework will be prepared for Charlton Riverside to guide development in this area'. LXB support Paragraph 4.2.7 in noting that Charlton Riverside is a key regeneration area that occupies a prime site on the River Thames and provides a significant opportunity for new high quality development. However, it is recommended that the last sentence of Paragraph 4.2.8 to altered to read as follows: 'Redevelopment of this area provides the opportunity to consolidate retail use and follow the sequential approach for determining suitable locations for retail units'.	Support for Policy EA1 is welcomed. The third bullet point of the draft Core Strategy has been removed as it is covered in the other bullet points. The Council will continue to seek to limit the overall extent of out of town retail at Charlton Riverside and promote Town Centres as the primary location for retail uses.

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DCS38	Metropolitan Police Authority		Metropolitan Police Authority	Brian	Coughlan	CGMS Consulting	Policy EA4 Strategic Industrial Locations This policy seeks to protect the Strategic Industrial Land, as shown on the Proposals Map, for continued industrial use. London Plan Policy 3B.4 Industrial Locations highlights the potential for surplus industrial land to help meet strategic need and local requirements for a mix of other uses such as housing and social infrastructure. This is also reflected in Policy 4.4 in the emerging London Plan which highlights the role which surplus industrial land and premises have in contributing to strategic land local planning objectives especially those to provide more housing, and, in appropriate locations, to provide social infrastructure. The MPA/S have identified the importance of such land in providing suitable locations for patrol bases and custody centres within the borough. It is therefore considered that draft Policy EA4 does not accord with the overarching policy. The following wording alteration is proposed at the end of Policy EA4: Land within Strategic Industrial Locations, if identified as surplus to borough requirements, should contribute to strategic and local planning objectives such as the provision of housing, social infrastructure and to contribute to town centre renewal. Policy EA(a) Local Employment Sites This policy seeks to protect Local Employment Sites for continued employment use. London Plan Policy 3B.4 Industrial Locations highlights the potential for surplus industrial land to help meet strategic need and local requirements for a mix of other uses such as housing and social infrastructure. This is also reflected in Policy 4.4 in the emerging London Plan which highlights the role which surplus industrial land and premises have in contributing to strategic land local planning objectives especially those to provide more housing, and, in appropriate locations, to provide social infrastructure. The MPA/S have identified the importance of such land in providing suitable locations for patrol bases and custody centres within the borough. It is therefore considered that draft Policy EA(a) does fully support the delivery of policing. The following wording alteration is proposed at the end of Policy EA(a): iv) The proposed use is for community infrastructure and provides employment density levels which are similar in nature to an employment generating use.	All comments have been noted
DCS40	Clare	Kemsley					I live on Greenwich High Road and feel strongly that there should be appropriate detailed long-term plans for the area's development. In particular, we need a supplementary planning document for the immediate area. I make particular reference to the two strategic objectives of the Draft Core Strategy: * ' protect and enhance Greenwich's rich natural and built heritage * to promote high quality architecture and urban design in all developments in Greenwich. It's important that Greenwich High Road sees effective implementation of these objectives. A lot of piecemeal development has already happened or been planned, and I don't think that it all meets these criteria. However, we should not assume that it's too late to implement more appropriate planning. Immediate steps should be taken to make sure any further development is planned and controlled with a supplementary planning document or equivalent neighbourhood plan. The architectural character of the area should be improved (or maintained where appropriate), rather than worsened by development. And it must have a positive impact on the experience of current	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

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							and future residents. I am keen to continue living on Greenwich High Road and I hope that new developments retain what's good about the area, and make real improvements where necessary. However, we can't rely on piecemeal planning to achieve this. I have strong concerns that without appropriate long-term planning, it may deteriorate as a residential area rather than improve. I hope the council is able to ensure that a supplementary planning document is produced for our area.	
DCS42			Greenwich Peninsula Regeneration Ltd	James	Wickham	Gerald Eve	Policy EA1 - Economic Development We support the references at bullets 2 and 3 to creating a new Centre at North Greenwich and to increasing employment opportunities. However as we have described above we believe that North Greenwich has the potential to play a more significant role than merely as a District Centre over the plan period.	Support welcomed The permission for retail development does not meet the figures required for designation as a Major centre as set out in the London Plan which states that Major centres generally contain over 50,000sqm of retail floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions. Para 2.74 of the Draft Replacement London Plan states that changes to the upper tiers in the network (Major and Above) should be co-ordinated first through this plan.
DCS43	Barbara	Reid					3.3.29 'The Creekside Strategic Development Location' refers to creating a 'cultural node' or a 'cultural quarter'. This area, Opportunity Area 7 in the London Plan, straddles the Greenwich/Lewisham border. If the aim is to build up 'a cluster of creative and cultural industries', then the two Boroughs will need to co-ordinate their employment-creating initiatives, through some sort of neighbourhood plan. This co-ordination can most sensibly be mapped out by a joint Greenwich - Lewisham Supplementary Planning Document for OA7.	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

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ID	**Given Name**	**Family Name**	**Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Economy - Question 10: Economic Activity and Employment (Refer to sections 4.2 and 5.2)**	**Council response**
DCS59	Judy	Smith	South Greenwich Forum				EA1 Economic Development: Eltham/south of borough should be included as ideal for small business office development and live/work premises. Greater emphasis on the need for apprentice opportunities for young people. General: Specify the need for development planning to consider neighbouring premises (ie to avoid situations like the 3 bookmakers in a row in General Gordon Square).	Support for small business space has been added to policy EA1. It would be inappropriate for the Core Strategy to place restrictions on retail activity as suggested but regarding betting shops specifically, an amendment has been made to TC(b) which may be able to limit betting shops in designated retail frontage.
DCS69	Laurie	Baker	Eltham Society				Policy EA1 should include Eltham/south of the borough as a location for small businesses - small offices and live/work activities. Policy EA(d) should also promote the idea of apprenticeships at new developments	Support for small business space has been added to policy EA1.
DCS84	Anna	Townend	Greenwich Environment Forum				No/Yes	Noted
DCS45	Peter	Rice					agreed - cruise liner terminal will bring potential 3,000 plus visitors per ship and economic/ employment benefits Parking for coaches and transport links to Greenwich town and central London will need improvement	The Infrastructure section of the Core Strategy sets out the transport improvements that are planned.
DCS71		Tilfen	Tilfen Land Ltd	Craig	Blatchford	Blue Sky Planning	Policy EA4 includes the identification of West Thamesmead/Plumstead Industrial Area, including White Hart Triangle as Strategic Industrial locations in accordance with the draft London Plan. In addition to White Hart Triangle, the designation includes areas such at the Tear Drop site (j15 on the UDP Proposals Map) and what is known as the Ford A site (at the corner of Griffin Manor Way, Nathan Way and Hadden Road). These sites comprise older employment buildings and/or include additional development costs which may render a solely B class development unviable without public sector input. Therefore, we would suggest that Policy EA4 or the Proposals Map allocations for these sites specifically allow for uses complimentary to the principle B class uses such as: - Sui generis uses that are industrial in character -Trade wholesalers (including cash and carry) and trade counters - Other quasi employment uses-Non retail commercial uses (e.g. petrol filling station, car showrooms, etc - Other uses which support the primary employment functions (i.e. crèche, small scale retail serving local needs, etc)	Suitable uses within SIL are set out in the London Plan in Policy 2.17 and need not be repeated in the Core Strategy.

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DCS60	Lawrence	Smith	Westcombe Society				Greenwich is becoming a dormitory suburb without increasing the amount of employment. The Strategy suggests increasing employment but there does not seem to be any strategy as to how to do this. Developments should include design units/studios/small work units to help shape communities and foster local employment. River crossings would also increase access to nearby employment (with the provisos mentioned in the answer to question 5) Policy EA1 Economic Development. The development of Woolwich as a centre of employment may be desirable but the strategies to ensure this are insufficiently detailed. Business and employment in Woolwich is not flourishing at present and the analysis as to reasons why this may be is weak. Clearly major employers have left the area but it is unclear how they could be attracted back. Crossrail would be a benefit, but would provide a route out of Woolwich as well as a route in. Charlton Riverside is hampered by poor transport connections and, along with North Greenwich and Greenwich Peninsula, it is also hampered by severe traffic congestion especially during the peak hours, at weekends and before and after events at the O2. Pedestrian and cycle routes connecting these areas to East Greenwich and Charlton are also unpleasant to use even at the best of times. It is difficult to see how these problems can be ameliorated given the geography. One solutions might be to construct more substantial, attractive links, possibly including interesting landscaping or small retail, between Greenwich Peninsula West and the Peninsular, and between Charlton and Charlton riverside (similar to the Green Bridge at Mile End). Policy EA2 The development of Charlton Riverside is also to be welcomed but is heavily dependent on adequate infrastructure (see question 6 and comment on EA1). Employers will be attracted to the area if the infrastructure is in place. The replacement of some of the retail use of Charlton Riverside with mixed development is to be welcomed. Policy EA3 It is hard to see the attraction of Greenwich Peninsula West as a strategic development location with the gas works, the tunnel approach road and the neighbouring industrial location. The area currently has poor access. More thought should be given to mitigating this e.g. our suggestion of a green bridge (see comment on EA1). Policy EA5 Tourism. The areas of major tourism are identified. Improved transport links would assist people who also want to visit the south and east of the borough from Greenwich WHS. Further tourism development around Woolwich, including the extension of riverside walkways and cycle tracks would be welcomed. Issues around access to the Peninsula and the nature of the Olympic legacy have not been adequately addressed in the Strategy. Congestion around the O2 can seriously affect access to public transport and in particular to North Greenwich Station. Tourists are only likely to wish to stay overnight if transport links both within the borough and into central London, are improved.	The Woolwich Town Centre Masterplan SPD provides more planning guidance for the Centre and will hopefully prove valuable tool in aiding its regeneration. The Core Strategy recognises that the development of Charlton Riverside is dependant on increased transport in the waterfront area. This is further detailed in the Charlton Riverside Masterplan SPD.
DCS67	A.E.	Hart					There is already above average unemployment and below average income (1.6.1). Rather than building more housing in the Opportunity Areas and the Areas for Intensification proposed in the DCS, the Borough should help revive and create new businesses and industries including high-tech industry in these places to provide more employment which are relatively near to where people already live in the	Comment noted, additional employment opportunities are an important part of the Core Strategy. Residential led mixed use schemes can and do incorporate employment generating uses.

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							Borough. This would reduce time and money spent commuting and help improve the air quality (another stated aim, 1.6.1). I therefore agree in some way with the Reasonable Alternative Spatial Strategy. 3.2.3 states that there will be a minimum of 32,235 new homes by 2027 and only 21,000 new jobs so there is a serious lack of joined-up thinking in the DCS. eg in Charlton Riverside, 'Residential-led regeneration' on land where industry used to be (3.4.5) would be no use if 'industrial land in London has become a scarce resource' and led to a scarcity of jobs.	
DCS85	Frank	King					4.2.1. Wonderful dream, I hope that it is achieved. 5.2.2. & Policy EA(b): Whatever happens these wharves must not have houses built on them as they might be needed in the future. They can be used for recreation or short-term buildings, but never for houses as it puts this land out of use for the River for over a hundred years. 5.2.4. & EA(c): Yes, I completely agree, Pubs are a very important social amenity and must be provided a long with the new house building programme. 4.2.7. You must be dreaming, 6,000 homes in this area is unsustainable and untenable because it would be strangled without transport access which cannot be built into this density. The whole area will end up as a ghost town because people simply will not want to live there. 4.2.15. I am pleased that the Plan recognises the importance of the Aggregate Plant and the facilities around Angerstein's Wharf served by the Rail Spur. As I have said, a combined waste management facility, with all four types of waste being handled in one location would be a boon to the Borough and to London in general. You may not agree with my vision at this time, but I implore you to consider the possibilities of having all four waste management sites in one place. The Riverside is the most obvious location, and Angerstein's Wharf in particular, as it has all four elements required viz: River access for transportation of waste for processing and after processing to point of sale etc. A Rail Spur Ditto. Eventually, good Road links Ditto. And last, but by no means least, a plentiful water supply for both the processing and cleaning purposes. Policy EA5 and 4.2.18 to 4.2.21:"Increasing the number of visitors staying overnight". More effort should be directed to Bed & Breakfast accommodation because the majority of visitors cannot afford Hotel rates. Many people might well spend a much longer period, perhaps a week or more, if they could get rooms for Â£15 to Â£25 per night so that they could take their time touring the Borough. If you add to this a comprehensive list or directory of all of the places of interest within the Borough, visitors and tourists would increase dramatically. I have travelled extensively in this Country and have never paid more than Â£ 15 for a night's stay anywhere. Most of the time I was only paying either Â£8 or Â£10 per night, although this was years ago, I would generally stay for a week in most areas. Also, the Tourist Information Centres must keep an up-to-date list of B & B's, together with current prices. When travelling I used to telephone the local TIC wherever I intended to stay and they nearly always had an up-to-date list, if they did not I would often not go there, but would ring around the TIC 's until I found one that did have a list. I am mystified as to why most big cities do not have these lists, but they do not as a rule even though they have lots of TIC's. In smaller towns,	Comments noted. The wharves listed in policy IM5 are safeguarded for river based cargo handling and the Council will respect the safeguarded status. Should the safeguarding be removed by the Government, then alternative uses may be considered. There are expected to be around 3,500 new homes in Charlton Riverside. Para 4.2.7 has been amended accordingly. A number of budget hotels have recently opened construction in the Borough.

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							Seaside towns and beauty spots the local TIC always has an up-to-date list.	
DCS52			Greenwich Hospital	Neil	Lucas	Drivers Jonas Deloitte	GH supports Policy EA1 of the Core Strategy, which seeks to create jobs by increasing employment opportunities in existing sectors such as retail, business services, leisure, hospitality and tourism. Greenwich Hospital considers that the most effective way to achieve the right balance of jobs and improve the access to employment within the Borough is through mixed-use developments and flexible use of office space, to enable developments to be more resilient to a changing economy, which will underpin a sustainable and viable local economy. Policy EA5 specifically seeks to support the expansion and diversification of the Borough's tourism industry, which is supported by Greenwich Hospital. The regeneration of Greenwich Market accords with Policy EA5 as it will provide hotel facilities as well as an improved market and retail units, which will serve as a significant attraction for visitors to the Town Centre. As the proposals have been approved, Greenwich Hospital considers the market site should be listed under point 2 of the policy, due to its significant role as a visitor attraction within the Town Centre.	Although the market site has planning permission it has not been developed yet and therefore will not be referred to in Policy EA5.
DCS80	Janet	Goulton	London City Airport Limited				4. LCA supports the plans in the Draft Core Strategy to further exploit Greenwich's role as a centre for tourism (Policy EA5) and offers support to the Council in updating its tourism strategy (4.2.23). As a result of LCA's 2009 planning approval to grow to 120,000 annual flight movements over the coming years, an increase of approximately 1000 airport jobs is forecast, alongside route diversification and frequency increases. We would welcome engagement with the Council in order to support the borough to leverage the economic, social and tourism opportunities provided by this growth. 5. As you may be aware, LCA delivers a comprehensive community engagement programme to ensure that residents in local boroughs can harness the economic and social benefits of our operation. One of the focus areas is skills and local employment and in Greenwich this is currently facilitated via GLLaB. Should Greenwich Council have further advice or guidance in this area, LCA would be very happy to engage.	Support noted, no action required

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DCS47			Tesco Stores Ltd		Russell	Nathaniel Lichfield & Partners Ltd	Support for Policy EA1 with the expansion of existing businesses and increased employment opportunities, but also including new businesses coming into the Borough. In particular support for the Council seeking to improve the quality and positioning of Woolwich Town Centre, delivering new retail, leisure and office jobs	Support welcomed, no action required.
DCS49			Mason Developments Ltd	Diana	Thomson	GVA Grimley	Our client supports proposed Policy EA3 of the Draft Core Strategy with Development Management Policies which promotes a new urban quarter at Greenwich Peninsula West to include residential, leisure and commercial uses.	Support noted. It is also worth noting that since the Draft Core Strategy was published, a Masterplan SPD for Greenwich Peninsula has also been adopted.
DCS51			Canmoor Asset Management and the Woolwich Partnership	Peter	Edwards	Planning Perspectives	Canmoor own a number of sites within the 'Charlton Riverside Strategy Development Location' which is proposed to be allocated under Policy EA2 as 'a new urban quarter' where a vibrant mix of uses is proposed including up to 6,000 new homes. Canmoor supports this proposed allocation but has concerns (objections) to the objective that the future development will consolidate existing employment uses to maximise the use of the land and through the intensification of use will seek to ensure 'no net loss of employment across the Waterfront area' (Paragraph 4.2.8). The supporting text to Policy EA2 is not specific as to the type of employment uses that will secure the status quo and in this regard Canmoor would wish to see greater clarification as to the type of Class B1 uses the Council considers appropriate in this location. Canmoor is particularly keen to ensure that only commercially viable uses for which market demand exists are promoted as part of the mix of uses proposed for this area. Canmoor is also concerned that the policy should confirm the broad distribution of land uses across the site so as to provide greater developer confidence as to what may be considered appropriate say along the frontage to the Thames and adjacent to the Woolwich Road. As a large site, in excess of 100 acres this location clearly represents a key regeneration opportunity. As a major landowner, Canmoor would wish to be party to the formulation of any future Area Action Plan (AAP) or Opportunity Area Planning Framework (OAPF). In particular Canmoor would wish to see a clear phasing programme and a commitment from the Council to use its Compulsory Purchase Powers to assemble the site. This is considered necessary if the regeneration of the area is to proceed within the timeframe set out at Paragraph 3.3.14. Given the support to Policy EA2 Canmoor also supports Policy EA1, which promotes economic development. However, as indicated above employment development must be market led if a sustainable mixed use community is to be created. It would be wholly inappropriate to require the development as a whole to subsidise speculative development that would remain vacant and underutilised when more active and appropriate land uses exist. Canmoor	The Charlton Riverside Masterplan SPD provides more detail on the regeneration of this area. It is also worth noting that an Employment Land Review has been carried out and will be published alongside the proposed submission version of the Core Strategy which has analysed the existing employment areas in the borough and identified potential locations for release of employment land.

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							acknowledges the change proposed in the Draft London Plan which also identifies this location as an Opportunity Area. Any proposals for this site must reflect an up to date review of employment land and housing requirements and any future AAP or OAPF must be flexible enough to accommodate changing requirements. Canmoor acknowledges the transport proposals for this area and would be keen to ensure that uncertainties in this regard do not unduly delay development taking place. Canmoor looks forward to working with the Council and other agencies in bringing forward these opportunities and resolving the concerns expressed above.	
DCS55			Sainsburys Logistics Limited	Christiaan	Robinson	Turley Associates	Sainsbury's Logistics Ltd fully commends Policy EA1 and the Council's intention to support the expansion of existing businesses who are seeking to increase employment opportunities. In relation to Policy EA2, where it advises that employment will be consolidated to maximise the use of land for a new urban quarter, Sainsbury's Logistics Ltd support the Council's ambition to improve and revitalise this area , however, we feel it is important that the wording of the policy does not prioritise residential development in Charlton Riverside at the expense of potential commercial development coming forward in this part of the Borough. Moreover the location of residential development must not prejudice the long term operation and viability of consolidated employment areas.	Support for Policy EA1 is welcomed. We are going to continue to seek to reduce the amount of out of town retail at Charlton and promote Town Centres as the primary location for retail activity.

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DCS58	Martina	Keating					In particular, I am extremely worried about the impact of the planned and current developments happening in Charlton, particularly the development at Charlton Riverside and the 'Squirrel Storage' site, and the general dismantling of a significant number of the larger Victorian properties in Charlton into multiple occupancy units. Including the very recent auctioning by Greenwich Council of 2 very large homes in Wellington Gardens with significant garden sizes that are likely to be built upon. Your strategy document talks about the maintaining the character of Charlton. Can this strategy address this? Indeed the very fabric of the neighbourhood is being dismantled piece by piece as more people move into these smaller units and then move out when families come along. It encourages a transient population and breaks down what little sense of community and neighbourhood there is here. In addition, as no secondary school exists in the Charlton area, families are forced to look outside the area, and in some cases, to have to move to a new area to educate their families. Again, this increases the 'churn' and the disintegration of the neighbourhood. I also believe that the strategy must be being affected by the cost cutting required by central government. What, realistically, does this mean for residents? Charlton is sandwiched between Woolwich and Greenwich and I think overlooked when it comes to support from Greenwich Council. What about investment and support for retailers wishing to move into our small 'high street' in Charlton Church Lane? Our amenities are currently reduced to a Post Office (thankfully) Tattoo parlour (!), 3 fast food outlets, 3 'corner' shops for the entire area. The appearance of the street is very 'low rent' and we currently have a drug dealing problem outside these shops. This is known to the SNT. The high street and train station would be considered by many in the neighbourhood as a no-go areas after dark. Parking is very difficult for residents and impossible around football matches and on evenings when there are events in the two Social clubs on Charlton Church Lane. This situation is getting worse as more homes are broken up and more flats built and gardens built upon. This has to be taken into account by Greenwich. Not only does the fabric of our neighbourhood need to be maintained, it needs to be improved. Without improvement, the efforts of local community groups and individuals to enjoy living in anything resembling a safe community will be of no use. To do this, care with planning needs to be taken and rigorous enforcement of planning decisions. We also need our SNT to be supported and expanded. The issue with gangs operating in the Cherry Orchard, Plumstead and Woolwich areas - though being addressed, is of immense concern to the community. Can the strategy try to address this with careful and considerate neighbourhood planning? In summary:- I would wish the council: to make a more realistic appraisal of the proposals outlined, in light of the current economic situation. As the document stands no reference is made to the likely impact of budgetary cuts; to make a greater commitment to full consultation with residents in this area. Charlton Riverside is likely to have an immense impact on amenities, especially transport, in the parts of Charlton where I live, close to the station and the document merely suggests that the character of Charlton is maintained.	Further work has since been carried out on the Charlton Riverside area and in April 2012 a masterplan SPD was adopted providing more detailed planning guidance. Protection of amenity and back gardens in Charlton can be addressed in the design policies which apply to Charlton and the rest of the borough. There is a specific policy in the Housing section relating to the conversion of houses into flats.

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							It will in fact be necessary to protect and enhance this part of Charlton if we are not to suffer from the massive planned population increase on our doorstep; to ensure a greater emphasis on monitoring and enforcement council decisions, particularly planning conditions and parking restrictions; to take more account of the possible deterioration of the environment, increased deprivation and isolation if housing density is allowed to continue to increase; to protect and where possible increase the number of open spaces and community spaces, in order to increase the safety and wellbeing of users; to consider more fully the accommodation requirements of older people and people with disabilities in the area; to make a commitment to improving and enhancing those areas that lack the services and facilities to become truly cohesive and health communities; to develop firm proposals for secondary school provision in Charlton; and to place a greater emphasis on attracting a wider range of businesses into the borough to increase opportunities for local people to broaden their skills base and effectively compete in a challenging employment market.	
DCS81	Linda	Hodgson	Heathway Residents Association				Policy EA1 Economic Development -We note that in the current Borough Tourism Strategy that tourism related activities are the second largest employment sector after the public sector. This would appear to be an important strategic context, which doesn't appear to be fully reflected in this section. p73 We support the aims espoused in this policy and are very interested to understand how they will be delivered in practice, especially for Blackheath Standard. This will require more detail than currently provided in the Core Strategy alone.	Tourism is mentioned in Policy EA1 and in addition to this Policy EA2 specifically relates to tourism.
DCS88	Sarah	Dye	Cory Environmental Ltd				Draft Core Strategy Policy EA4 Within the Draft Core Strategy it is proposed that the site retains an industrial land allocation as a Strategic Industrial Location, (draft Policy EA4). The draft Policy currently states that: 'Charlton Riverside (part) /Aggregates Zone. This is the Council's preferred location for open yard aggregates, crushing and scrap uses and will be protected for the continued aggregates and rail freight use'. Whilst Cory fully support this continued industrial land allocation, this area is not currently solely occupied by aggregates industry and we would like this to be reflected within revised wording for this policy. Policy EA2- The area to the south of the Bargeworks has been identified as a Strategic Development Location (draft Policy EA2), with the aspiration of the land (Charlton Riverside) being used for a new mixed use urban quarter, providing around 6,000 new homes, with around 70% to be provided during the Plan period. Policy EA2 reflects the potential major redevelopment sites identified in the Draft London Plan as Opportunity Areas.	Subsequent to the Draft Core Strategy, the Charlton Riverside Masterplan SPD was published in April 2012. Also, the Employment Land Review which is to be published as part of the Core Strategy evidence base alongside the proposed submission version analysed the existing employment areas in the borough and makes proposals for areas to be released from SIL designation. The Council has and will continue to work with stakeholders in Charlton Riverside to ensure that the area is successfully regenerated.

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							We feel that there is no reason why industry and residential mixed uses can not sit side by side, Cory operate several sites where is this is case. However, in allocating land or permitting development adjacent to industry, it needs to be recognised that there are inherent issues which require a design solution which takes full account of existing industrial neighbours. The Draft Core Strategy states that there will be An Area Action Plan prepared to guide development at this site, Cory would like to input into the development of this document.	
DCS90	Mrs	Abraham	Mansoor				No difference - You are getting rid of the green area in the centre of Woolwich to replace it with what? Everybody is querying what's going on at this difficult time?	Comments are noted but no action required

Question 11 – Town Centres – Do you have any comments?

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Town Centres - Question 11: Town Centres (Refer to sections 4.3 and 5.3)**	**Council response**
DCS3			Barclays Bank Plc	Michael	Fearn	Shire Consulting	b. Retail Policy On the matter of policy formulation PPS12 is clear that all DPDs must be: founded on a robust and credible evidence base; the most appropriate strategy when considered against the reasonable alternatives; and must be consistent with national policy. Policies TC(a) and TC(b) merely continue the stance towards non-A1 uses taken in UDP Policies TC17 and TC18. The same thresholds are adopted and by implication the new policies are to relate to the same frontages as the UDP (apparently the frontages are to be 'updated' for a future consultation stage, although the tables set out at pages 153-159 do not cover Woolwich Town Centre). It is acknowledged throughout this consultation document that Woolwich Town Centre is underperforming as a Major Centre (for instance see page 9 of the document) and that a strategy is needed to revitalise it in order to have it move up within the Regions hierarchy. Apparently, the transformation of Woolwich into a vibrant successful town centre is a key feature of the emerging Core Strategy (see page 38). However, there is no strategy in place to deliver this. Certainly, the continued operation of restrictive policy of the type in the UDP upon preventing acceptable non-class A1 uses from improving their representation is likely to work against this objective. The thinking in the Greenwich UDP that only A1 uses are appropriate in primary areas, derives from very outmoded and discredited thinking that other uses such as banks detract from the vitality and viability of town centres. Policies TC (a) and TC (b) are confusing and seek to impose arbitrary limits upon the levels of representation by Part A operators. The suggested percentage thresholds are described as appropriate at page 151, but no evidence is out forward to justify them. As drafted Policy TC(b) would prevent a successful non-shop use expanding into an adjacent premises, even though on some occasions this is the most sensible use of resources. The only reference in	The tables set out on pages 153-159 do not cover Woolwich Town Centre as the retail frontages for Woolwich, Eltham and Greenwich are set out on the Proposals Map inset maps. Woolwich Town Centre SPD sets out a strategy for the transformation of Woolwich into a vibrant and successful town centre. The Retail Capacity Study is now published. No change is required to policies TC(a) and TC(b).

							the draft document to retail evidence™ is to Greenwich's Retail Capacity Study; a report which is described as unpublished. If this document is to be part of the LDF evidence base then it should be published and made available to the public. The Bank is concerned that the UDP approach should not be continued in the emerging LDF as this is also likely to work against the Boroughs, and the Governments, objective of promoting a wide range of activities to return vitality and viability to town centres. The Bank believes that there is no good planning reason to restrict the presence of banks at ground floor level in primary shopping frontages and that the Council should recognise the important contribution of financial services such as banks in both bringing investment and acting as attractors for investment by others, in the wording and application of policies in all the relevant LDF documents. In our previous representations we also noted that keeping significant generators of footfall out of primary frontages will actively work against the achievement of the Council's strategic objectives and is inconsistent with national policy. The production of the LDF should provide the opportunity to examine proper evidence and to revise out-of-date planning policy, particularly if it is not consistent with national policy. Policy which seeks to limit certain Part A uses in the primary frontage undermines the Council's intention to attract private sector investment in the town centre. To succeed, town centres need to provide a full range of services and these often need to be located in ground floor premises in accessible locations. The wider role played by town centres than a pure shopping function is recognised throughout Government policy on town centres. By definition, uses that fall within Part A of the Use Classes Order are appropriate in town centres as they are shopping area uses and are acceptable without any need for restriction or qualification. This is particularly the case for the financial services sector. Advice on this matter is also given within ODPM Circular 03/2005 Changes of Use of Buildings And Land which accompanied the last major revisions to the Use Classes Order. This Circular specifically states in relation to the A2 Financial and Professional Services use class (which was created to separate those uses serving the public, from other office uses not directly serving the public - paragraph 32), that the Class is also designed to allow flexibility within a sector which is very much a part of the established shopping street scene, and which is expanding and diversifying. The uses within Class A2 are noted as being those which the public now expects to find in shopping areas (paragraph 38). Government Policy in PPS6 has been replaced by the publication of PPS4 Planning for Sustainable Economic Growth•. This continues the thrust of policy in PPS6 relating to town centres but also emphasises the importance of economic growth. Policy EC3.1c states that Planning Authorities should: at the local level, define the extent of the centre and the primary shopping area in their Adopted Proposals Map, following consideration of whether there is evidence of a need to designate realistically defined primary and secondary frontages in designated centres. The strong emphasis upon the promotion of town centre vitality and viability remains in the current PPS and the Government is clear that there should be a positive attitude towards all development which generates wealth and creates employment. The over-arching objective is sustainable economic growth	

							(paragraph 9). The Government is clear in PPS4 that it wants economic growth to be focused in town centres offering a wide range of services to communities in an attractive and safe environment and remedying deficiencies in provision in areas with poor access to facilities. There should be enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres (paragraph 10). Policy EC10.1 states that: Local planning authorities should adopt a positive and constructive approach towards planning applications for economic development. Planning applications that secure sustainable economic growth should be treated favourably. There is nothing in Government policy that recommends or supports imposing restrictions upon acceptable town centre uses at all and indeed Policy EC3.1 states that local planning authorities should set flexible policies for their centres which are able to respond to changing economic circumstances. It is therefore essential that development plan policies should facilitate the positive approach required by PPS4. The Bank therefore objects to Policies such as TC (a) & TC (b) as the Council has provided no evidence to justify the restriction of financial service retailers such as the Bank in core frontages and has not given consideration to reasonable alternative strategies. Class A2 retailers such as the Bank routinely experience very high levels of customer visitation, contributing significantly towards pedestrian movement and therefore the vitality and viability of town centres. To illustrate this point the Bank has undertaken a number of comparative footfall surveys in connection with its current acquisitions programme at its branches in various towns and cities in the UK (copies are attached). These conclusively show that the level of footfall associated with Bank branches is commensurate with, and often higher than, the best known national multiple Class A1 traders. Enhanced representation of financial services retailers can assist with the Core Strategy's stated intentions of providing skilled jobs to local people, lawing back town centre trade and attracting investment (Policies EA1, TC1 & TC2, &and paragraphs 3.3.7 & 4.2.1). Banks also have moved away from the traditional style of frontage, preferring to have an open, visually interesting and attractive face to the high street. The Bank has become increasingly retail in its presentation and has introduced an innovative flagship branch design, which has been developed in association with its customers, to transform banking into what it terms as a retail focused experience. The Bank estimates that some 10 million customers use its branches each week and through listening to their feedback, a design has been developed that meets their requirements for modern banking and provides branches similar in appearance and in operation to retail shops. The above is an example of the enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres that PPS4 expects and to which the Local Planning Authorities DPDs must also respond. Whilst the design of every new branch has to be flexible in order to be sensitive to the requirements of each building occupied, the aim is generally to ensure that over 70% of the internal space at ground floor is accessible to customers. The Banks footfall surveys have been a key element in helping to change attitudes towards the presence of banks in core shopping areas and primary frontages. Even planning authorities that once	

							strongly resisted Class A2 uses in their primary areas have granted permission for Barclays flagship outlets. Examples of authorities that have recognised the wider benefits of the flagship design (following receipt of applications which have been supported by evidence of high footfall), include Southampton, Reading, Manchester, Milton Keynes, Romford, Southend, Leicester, Plymouth, Sheffield, Kensington & Chelsea and Cambridge. The Banks managers regularly report that upon the opening of a flagship branch the customer visitation levels significantly increase and thus the level of activity helps to underpin pedestrian flows to the benefit of surrounding traders. Follow up surveys of new flagship branches were carried out at four sites - Milton Keynes, Southend, Reading and Southampton - in October 2010 (copies are attached). In every case the new flagship branch significantly increased its footfall, confirming the Bank's beneficial effect on vitality and viability. It is therefore important that planning policy recognises the benefit of bank uses in fostering footfall and pedestrian activity and that it should not resist much needed investment by financial service retailers. ADDITIONAL COMMENTS PROVIDED AFTER THE WORKSHOPS Vision for Town Centres 2027 - To succeed, town centres need to provide a full range of services and these often need to be located in ground floor premises in accessible locations. This point was picked up in the initial discussions regarding the creation of a successful Vision, as was the Non-Vision consequence of the failure to diversify, being long-term vacancy and decline. Banks are important contributors to town centres and significant attractors of visitation and this important role in underpinning town centres and assisting in regeneration should be recognised in all policies in the LDF on the matter of promoting town centre vitality and viability. Evidence on these matters (such as footfall surveys) has already been provided by the Bank with its representations upon the Core Strategy. The group discussed the need for additional skilled, high quality, employment in the Borough, the need for more private sector investment, as well the need to get more people into town centres and the need for something different to attract people. The Bank is already a major employer, provider of quality jobs and investor in the Borough. As was explained to the Town Centre Manager, the cost of the Bank's fit-out in improved premises is often in the order of £1.5 million (considerably in excess of the investment made by most Class A1 occupiers). There is also compelling evidence that the investment that the Bank makes into town centres leads to increased visitation and therefore should also benefit nearby shops. In relation to the policy discussion a comment was reported as having been made upon Policy TC1 (Town Centres) that it would be valuable if planning policy could designate different types of shops in town centres. This goes beyond what land use planning policy can achieve and for that matter beyond Local Planning authority control. If the building is within Use Class A1 (or for that matter Classes A2-5) then the Local Planning Authority is not in a position to prevent its occupation by another shop user. This is a similar point to the Banks objection to Policy EA(c) which seeks to prevent the change of use from pubs that have a significant community role. The Bank cautioned that the proposed policy was unsound for a number of reasons, including the permitted development rights to be able to change to other Part A uses (including Use Classes A1-3, or Class A4	

							non-community drinking establishments) without needing planning permission. Policies TC2 (Woolwich Town Centre) TC3 (Eltham Town Centre) TC4 (Greenwich Town Centre), TC5 (North Greenwich District Centre), TC6 (Other District Centres) & TC7 (Local Centres and Neighbourhood Parades) - these policies are the Bank's main area of interest and as Mr Tyler had clearly read our previous submissions it is not our intention to repeat it all here. At the workshop we mentioned the fact that many towns and centres are likely to contract in the future and that strategies are needed to deal with the empty units particularly in off-primary locations that could result. In some cases the decline may only relate to certain parts of the centre, but in other instances it is likely to be much more severe, perhaps leading to a total change in overall position in the hierarchy. During the discussion there was clearly resistance to the replacement of shops with fast food outlets, but acceptable alternative uses need to be found if widespread, persistent, vacancies are to be avoided. It was suggested by one participant, although not recorded in the notes of the meeting, that the proliferation of takeaway outlets merited the introduction of a policy restricting non-shop uses to certain thresholds (the speaker was clearly unaware that the Council already operated such policies in the 2007 UDP). This type of policy approach has thus already failed (the Government's Vital and Viable Town Centres: Meeting the Challenge made the point in 1994) and the Bank opposes the continuation of this approach into the next phases of the Core Strategy/Development Management policies. It is appreciated that political pressures may make it difficult to acknowledge the inevitability of decline in some centres, but an attempt to address the issue of surplus space should be made in the interests of good planning. When the next Borough-wide shopping study is undertaken the consultants should be instructed to consider the matter of dealing with managing the decline and thought should be given to contracting the shopping role of some centres and encouraging the replacement of redundant shopping floorspace with other uses. The Workshop was a helpful method of highlighting a number of local issues and bringing these forward for discussion. The Bank trusts that the comment in this response is also a useful contribution to the process of policy formulation and that full regard will be taken of the points raised in the preparation of the next stages of the Greenwich LDF documents..	
DCS9	Paul	Webbewood					I strongly support the last sentence on page 25 about the need for new developments to complement existing centres rather than threaten them. The Council seems to have great ambitions for Woolwich while apparently believing that Eltham can be left to look after itself. It is important not to give the impression that Eltham is in anyway subordinate or complementary to Woolwich as a town centre. I would therefore suggest that: - para 4.3.8 starts 'Woolwich is a main centre for...' rather than 'Woolwich is the Borough's main centre for...' - the first sentence of para 4.3.15 reads 'Eltham is a major retail centre and is also an important employment centre and office locations. It offers a community focus for residents in the south of the Borough and adjoining areas.' One of the attractive features of Eltham at present is the provision of short-term parking on the High Street. Any bus priority measures (policy TC3) should not be at the expense of this. Policy TC6 mentions Lee Green which is mainly in	The Draft Core Strategy reflects the importance of Eltham Town Centre, especially for the South of the Borough. As part of Duty to Co-operate Royal Greenwich is in discussion with LB Lewisham on their plans to redevelop the Leegate Centre.

							Lewisham. The policy should refer to working in collaboration with Lewisham Council to improve the area.	
DCS11		WM Morrison Supermarkets Plc	WM Morrison Supermarkets Plc			Peacock and Smith Limited	Table 5.1 District Shopping Frontages (Page 154) refers to the existing Morrisons store as a Safeway Superstore. This needs to be amended to reflect the current occupation of the retail premesis (i.e. Morrisons). The same table also needs to be reformatted/realigned to clearly identify that the Morrisons store is Core Shopping Frontage (as per the adopted UDP proposals map, July 2006). Accordingly, the designation should also be reflected on the emerging Proposals Map.	Updated to reflect that it is now a Morrisons store.
DCS16		Sainsbury's	Sainsbury Supermarket Ltd	David	Armstrong	Turley Associates	Sainsbury's Supermarkets Ltd. generally supports the Core Strategy & Development Management Polices DPD. In relation to Policy TC2, where it says that 'Woolwich will accommodate the majority of additional town centre development in the Borough over the Plan period', we commend the Council's ambition to strengthen the performance of Woolwich town centre, however, we feel it is important that the wording of the policy does not prioritise development in Woolwich at the expense of potential development coming forward in other parts of the Borough. Retail and town centre uses development proposals should be judged on their own merits, on a case-by-case basis and subject to the tests and requirements set out in PPS4 i.e. the sequential and impact tests. Furthermore, we feel that the comment in Policy EA2 that reads: 'there will be a reduction in the amount of out of town centre retail in this area' similarly predetermines any site coming forward under the PPS4 tests, and should therefore be removed.	The intention is to continue to seek to reduce the overall extent of out of town retail.

DCS21	Carmelle	Bell	Thames Water Plc				Policy TC(d) (Hot food Take-aways) Hot food establishments should dispose of fat/grease into properly maintained fat traps to reduce blockages in the public sewerage network which can lead to sewer flooding. Thames Water therefore recommend that the following text is incorporated into the policy/supporting text: "Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. 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 this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Further information on the above is available in a leaflet, 'Best Management Practices for Catering Establishments' which can be requested by telephoning 020 8507 4321	This is not appropriate detail for the Core Strategy.
DCS24	John	Franklin	Greenwich Society				STRATEGIC POLICIES The Society's area of interest embraces the three District Centres of Greenwich (Greenwich Town Centre, i.e. London Plan West Greenwich; East Greenwich; and North Greenwich). The Society supports the policies and other less clearly-defined intentions relating to these town centres. The central issue from the Society's point of view is the need for the Council to focus on the achievement of those aspirations through the implementation of the policies, and to know how this is to be brought about, and in what time-frame. Policy TC4 Greenwich Town Centre: The Council will protect and enhance the historic character of Greenwich Town Centre whilst also promoting the multi functional role of Greenwich as a District Centre, a tourist destination and a centre for tertiary education. The Society supports this policy. But the issue of 'enhancing' the TC is long-standing: one of the main problems of the character of the TC is the shabbiness of many of the commercial properties, particularly in Greenwich Church Street. Our understanding is that the Council have only very limited powers to address this issue. So we would welcome further explanation of how this aspiration is to be achieved. Para 4.3.31: Retail development (use class A1 and A2) outside of the O2 Arena within the North Greenwich District Centre will be restricted to 22,800 sqm as set out in the planning permission for the Greenwich Peninsula Masterplan. The Centre will be focused on leisure based uses to ensure that it does not have a negative impact on the retail function of other town centres in the Borough, particularly Woolwich and Greenwich. The Society would welcome an explanation as to how the intention stated in the second sentence is to be ensured. The focus on leisure-based activities in North Greenwich may itself have a detrimental effect upon Greenwich TC. Comments on the findings sustainability appraisal relating to Town Centres has been put in that section. DEVELOPMENT	There is existing design guidance on Greenwich Town Centre including advice on shop fronts, advertisements and streetscape in the form of Supplementary Planning Guidance. These may be updated in future if this is considered appropriate.

							MANAGEMENT POLICIES The Society is content with the policies as described in respect of its area of interest. The acid test will be for the Council as the planning authority (coupled with its enforcement role) to ensure that they are duly implemented.	
DCS25		Waite					WOOLWICH TOWN CENTRE - needs more than a few new buildings/ squares. The customer service ethic needs inculcating; and the place would be more welcoming. Pleasant if fellow users curtailed their foul language and smoking habits. LOCAL CENTRES/NEIGHBOURHOOD PARADES - deserve more attention and support. Charlton is always overlooked because resources go to Woolwich and Greenwich.	Customer service and behaviour of locals is beyond the remit of the Core Strategy. Policy TC7 supports local centres and neighbourhood parades, their importance is recognised in paragraph 4.3.40 and a cross reference to the list of individual centres and parades has been provided.
DCS29		Mayor of London	Greater London Authority				TC1 Support town centres identified in the Core Strategy. Policy could be extended to indicate the importance of town centres also for residential development. Support estimated comparison goods floorspace capacity to 2027. TC2 - 7 Support these town centre policies including new leisure-led District centre at North Greenwich. Please note office development at North Greenwich should not be promoted to the extent that it would prejudice the potential of Stratford to develop as a strategic office centre. Support new local centre at Kidbrooke (Area for Intensification).	Support for residential development in Town Centres has been added to Policy TC1. Planning permission is in place for over 300,000sqm of office development on the Peninsula.
DCS30	Rose	Freeman	The Theatres Trust				Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and therefore anticipate policies relating to cultural facilities. Policies TC1 and TC4 Although the supporting text for Policy TC1 at 4.3.2 states correctly that entertainments, arts, culture and tourism should be located in town centres, the supporting text at 4.3.25 for Policy TC4 includes all Greenwich's town centre uses except the Greenwich Theatre which has been situated at the bottom of Crooms Hill since 1969 (in the present building) and makes a major contribution to the economy of the town centre, not to mention the smaller Greenwich Playhouse. We recommend for consistency that the word 'theatres' is included in the first sentence of this paragraph. We also request that Policy TC1 includes the word 'cultural' after leisure for consistency and clarity. We suggest that this policy is 'fleshed out' to provide more substantial guidance for the protection and enhancement of existing contributors to the success of a town centres day and evening economies. Unfortunately the provision of cultural services is not a statutory duty for local authorities so if a local authority does not have either an arts or a cultural strategy or equivalent, and because there is no requirement for the spatial plan to cover culture, then arts and culture can be simply missed out from the policies. However you	Greenwich Theatre has been included in paragraph 4.3.29. Cultural attractions has been added to policy TC1.

							do have a Cultural Strategy which particularly mentions both the Greenwich Theatre and the Playhouse at para.3.2 as being part of Greenwich Town Centre. And according to the Cultural Strategy at para.4.5.1 Greenwich Theatre is part of the World Heritage Site so should be included at 4.3.25 in the Core Strategy. Also the Fan Museum is a very special venue in the town centre being the only museum in the world that deals with fans and fan-making. Why is this not mentioned?	
DCS38	Metropolitan Police Authority		Metropolitan Police Authority	Brian	Coughlan	CGMS Consulting	Policy TC1 Town Centres This policy states that Town Centres are the preferred locations for retail, leisure, office and other uses that attract and serve the public. As part of the MPA/S Estate Strategy police officer front counters are proposed where the public can interact with the police officers in a convenient town centre or retail frontage location and conduct such business as picking up a form or reporting a crime. These can either be stand alone or co-located within other units It is recommended that policy TC1 and its supporting text in section 4.3.2 is as supportive as possible to policing uses. The following alteration to the last sentence of section 4.3.2 is recommended (additional wording in bold): As publicly accessible locations with an existing diversity of uses they are considered the most appropriate locations for retail, offices, leisure and entertainment and arts, culture, **community facilities** and tourism. Policy TC7 Local Centres and Neighbourhood Parades Further to the representations in relation to Policy TC1 outlined above, it is also recommended that some changes are made to facilitate police shops in Local Centres and Neighbourhood Parades. It is noted that the final section of Policy TC7 sates that loss of A1 will be resisted 'unless the proposal would reinforce the function of the neighbourhood parade in serving the day to day needs of the local residents'. It is considered that the inclusion of a police shop within a Local Centre or Neighbourhood Parade would certainly satisfy this part of the policy. To ensure that this is the case it is recommended that the following alteration is made to the supporting text in section 4.3.35: Local shops, community, social and health facilities within walking distance of residential areas are a valued element of the social fabric and [to] help to minimise social exclusion.	Community facilities have been added into paragraphs 4.3.2 and 4.3.4.
DCS40	Clare	Kemsley					I live on Greenwich High Road and feel strongly that there should be appropriate detailed long-term plans for the area's development. In particular, we need a supplementary planning document for the immediate area. I make particular reference to the two strategic objectives of the Draft Core Strategy: * to protect and enhance Greenwich's rich natural and built heritage * to promote high quality architecture and urban design in all developments in Greenwich. It's important that Greenwich High Road sees effective implementation of these objectives. A lot of piecemeal development has already happened or been planned, and I don't think that it all meets these criteria. However, we should not assume that it's too late to implement more appropriate planning. Immediate steps should be taken to make sure any further development is planned and controlled with a supplementary planning document or equivalent neighbourhood plan. The architectural character of the area should be improved (or	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

							maintained where appropriate), rather than worsened by development. And it must have a positive impact on the experience of current and future residents. I am keen to continue living on Greenwich High Road and I hope that new developments retain what's good about the area, and make real improvements where necessary. However, we can't rely on piecemeal planning to achieve this. I have strong concerns that without appropriate long-term planning, it may deteriorate as a residential area rather than improve. I hope the council is able to ensure that a supplementary planning document is produced for our area.	
DCS42			Greenwich Peninsula Regeneration Ltd	James	Wickham	Gerald Eve	4.3 Town Centres We note the content of the Greenwich's Town Centre Network box. As described above, we are of the view that it would be appropriate for Greenwich's Town Centre's Network to encompass North Greenwich as a Future Major Centre or otherwise recognise that, when the permitted development on the Peninsula is complete, it will be of a scale and quantum comparable with a major centre with the appropriate accessibility. North Greenwich (4.3.30 - 4.3.31) As set out above, we consider that the North Greenwich Centre will, on the completion of the permitted development, form a significant new Centre in Greenwich which will have a wider than district role. We therefore suggest that Policy TC5 is modified accordingly and have suggested an alternative wording below. We also object to the suggestion that the retail outlets in the vicinity of The O2 are only appropriate for convenience retail, providing for the retail needs of workers and the local population as suggested by the reasoned justification. There is no restriction on the use of the retail space either within The O2 or in the area around it contained in the outline planning permission limiting it to convenience goods. Given the footfall North Greenwich experiences, which will grow as a result of both The O2s success and as the office and housing offer of the Peninsula develops, it may well become an attractive location for comparison-based retailers. GPRL would object to policy which sought to prevent this; it would be both undesirable and ultimately undeliverable, as there is an extant unconditional permission which permits this type of retail development. Indeed, the original retail analysis submitted with the Masterplan application anticipated that approximately three quarters of the retail space would be occupied by comparison retailers, including clothing, homeware and audio-visual goods. We therefore suggest the wording of Policy TC 5 be revised as follows: A new leisure-led District Centre will be created at Greenwich Peninsula to complement The O2 Arena. The Centre has the potential to form a Major Centre on completion of the floorspace for which there is existing planning permission. The Centre will perform a specialist role by catering for entertainment and leisure needs of national and international visitors as well as providing for workers and residents of the Borough. The Centre will comprise: The 26,000 capacity The O2 Arena entertainment venue; Sports, leisure, convenience and comparison retail outlets in the vicinity of The O2; A new Higher Education college specialising in digital media and design; New high quality office space. In view of the agreed identification of North Greenwich as a Centre (albeit the exact categorisation of which remains to be agreed) we do not consider it is appropriate or in accordance with national policy in PPS4 to set a floorspace cap on the space	The permission for retail development does not meet the figures required for designation as a Major centre as set out in annex 2 of the London Plan 2011 which states that Major centres generally contain over 50,000sqm of retail floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions. North Greenwich is unclassified in the London Plan but in Table A2.2 it is recognised that there is potential for future change over the Plan period to become a District Centre. This is reflected in Policy TC5. The specific reference to Convenience retail has been removed from Policy TC5.

							that can be delivered at the Centre. Policy EC3 of PPS4 is clear that local planning authorities should provide flexible strategies for the management and growth of their centres. It does not suggest that the growth of centres, once established in a borough's hierarchy, should be arbitrarily restricted when there is potential for additional growth. In the longer term there may be potential for additional retail floorspace on the Peninsula, for example as a result of increased expenditure or changing retail patterns, and it would be inappropriate to limit the area's capacity over 15 years of the plan period on the basis of a 2004 planning permission that will be over 20 years old by 2027. We therefore suggest that the reference to restricting the amount of floorspace outside The O2 to 22,800sqm in 4.3.31 should be removed. It is inappropriate and not in accordance with Government guidance. It is also unsound as it is not based on an appropriate evidence base.	
DCS59	Judy	Smith	South Greenwich Forum				TC3 Eltham Town Centre: Specify additional retail floor space as 'additional comparison retail floor space' to ensure it is not always read by developers as additional supermarket provision. Town centre certainly needs electrical and white goods, stationery, crafts, quality fashion. Put improved north/south links at the top of the list, and refer to DLR. Add small business office development and live/work premises. Acknowledge that further trading development in the town centre (for example an enlarged supermarket) requires action to provide more parking and improved traffic infrastructure.	The now published retail capacity study identifies capacity for both convenience and comparison retail in Eltham. Policy TC3 reflects this. The Eltham Town Centre Masterplan SPD covers issues around vitality and viability and deals with connectivity, traffic, parking and the potential DLR station.
DCS69	Laurie	Baker	Eltham Society				Paragraph 4.3.7 says that Major, District, etc. are listed in tables 5.1-5.3. However, Major Centres are not listed. The Society is of the view that TC3 Eltham Town Centre should seek to increase the amount of comparison shopping and non-retail workspaces. Although, we agree that there is a need to retain shopping frontages. Paragraphs 4.3.16-17 say 'there is limited capacity for further comparison goods shopping' as the Centre already has a good comparison offer and would benefit from a broader convenience offer in the form of a more modern, larger store. The Society questions these statements that seem to be based on an unpublished 2008 study. There is already an increase in convenience shopping since 2008 and the centre would benefit from a greater mix of shops. Paragraph 4.3.20 mentions the Eltham Regeneration Agency but there is very little transparency (apart of minutes on the website sometime after the event) and no input from local business or community groups. Policy TC6 does not recognise any District Centres in the south of the	The retail frontages for Woolwich, Eltham and Greenwich are shown on the Proposals Map Inset Maps. Paragraph 4.3.7 has therefore been amended. All of the Borough's district centres are mentioned in policy TC6 The reference in Policy TC(b) has been amended. The 2008 Retail Capacity Study is now published. The Eltham Regeneration Agency has been superseded by the Eltham Regeneration Board (4.3.23) In the London Plan Lee Green is designated a

							Borough, but should. [Note: reference in TC (b), third line, is made to TC (b). This should be TC (a).]	district centre in Lewisham Borough and the designation is being monitored. There are no other district centres in the south of Greenwich Borough.
DCS84	Anna	Townend	Greenwich Environment Forum				Yes/Ok. Could do better! i.e. Could explore EU funds/ donar sponsorships for individual streets/buildings.	Comment noted
DCS45	Peter	Rice					Agreed. Woolwich needs a town centre plan, redevelopment of under occupied buildings, encourage chain/ anchor shops to draw shoppers to the area - mall type shopping centre Eltham - little scope to expand - redevelopment of low rise buildings - quality retail and restaurants needed.	Paragraph 3.3.9 states that a supplementary planning document for Woolwich Town Centre has been produced to provide detailed guidance for the future development of the town centre.
DCS71		Tilfen	Tilfen Land Ltd	Craig	Blatchford	Blue Sky Planning	Policy TC6 supports retail development in District Centres including Thamesmead Town Centre. We note the emphasis is on improvements to the 'comparison' retail offer in Thamesmead. In our opinion, the Policy TC6 should not explicitly or implicitly seek to narrow down the type of additional retail development within Thamesmead Town Centre. The support should be for additional retail development generally with the aim that Thamesmead functions as a 'fully fledged town centre' (Para 3.3.43). Policy TC(d) relates to takeaways and identifies existing centres as the preferred location for such uses subject to criteria. However, it also suggests that there be a presumption against new takeaways within 400m of the boundary of a school. There is the potential for Town, District and other centres to be within 400m of a school and therefore the suggestion that there should be a presumption against such uses within some centres seems to be at odds with national and other policy guidance which seeks to locate such uses within centres. Therefore, we consider that TC(d) should be amended to reflect such circumstances.	The retail capacity study identifies that there is a lack of comparison retail in Thamesmead. Policy TC(d) has been removed. Policy TC(c) aims to restrict the location and concentration of hot food takeaways.
DCS77	Geoffrey	Belcher	Maritime Greenwich World Heritage Site				Policy TC4 Greenwich Town Centre The policy states that the Council will protect and enhance the historic character but there is no mention in the following support statements of how this protection will be undertaken. A review of the historic assets of the Town Centre would be helpful and also a cross-reference to the Maritime Greenwich World Heritage Site Management Plan.	A reference to policies DH3 and DH4 have been added to the support for policy TC4.
DCS60	Lawrence	Smith	Westcombe Society				Policy TC1. We support the identification of town centres as major sites for retail, leisure and office employment. However improved infrastructure, particularly transport facilities, is needed to support this development. The Strategy identifies the competition from Bluewater, Bromley and Stratford, and indeed Canary Wharf. There is a need therefore to identify and concentrate on the distinctive nature of town centres within the borough. Small units with economic rents could help to attract creative retailers and give the centres an individual character. Policy TC2. There is very little at the moment that attracts people to Woolwich and the area shows signs	Retail rents are outside of the remit of the Core Strategy. SPDs have been prepared for Woolwich and Eltham which provide further detail.

							of serious decline. Crossrail might only help to take people out of the area. The market is distinctive and could include the development of the indoor market. It is unclear how the Strategy will realise its expectations with respect to the re-generation of Woolwich town centre. Policy TC3. Eltham town centre is also in decline with an increasing number of pawnbrokers, pound shops and charity shops. A pedestrian-friendly environment would be an improvement. The Eltham Centre is an attraction but there are few other leisure facilities to attract restaurants and pubs. Transport links with the rest of the borough are poor. Currently new development and new infrastructure is concentrated to the north of the borough but the south of borough should not be forgotten. There may be less space for development but there are still areas that are run down and at risk. Policy TC4 Greenwich Town Centre would be improved by a serious and sensible pedestrianisation plan but not by divisive measures such as the currently proposed gyratory system. One of the distinctive features is the market and great care needs to be taken to retain its character, despite the new hotel. Policy TC7 Local and neighbourhood centres need to be retained and enhanced. Where the council owns retail property in these areas it needs to adopt a realistic policy with regard to rents in order to retain local shops. Although WS would like to see reduced car use we feel that it is vital that small neighbourhood centres have cheap and easy parking next to shops because otherwise people will drive past and only use the larger centres.	
DCS85	Frank	King					Policy TC2 and 4.3.8. to 4.3. 14. Woolwich Town Centre. Here is another grandiose plan for you. From the north side of Mc Bean Street/ the north side of Barnard Close, then the eastern side of John Wilson Street / Woolwich High Street/ Beresford Street. Most of this area is ripe for redevelopment. With the exception of the established shops like Argos, Primark, Boots etc. which could easily be incorporated" the whole area could be demolished and replaced with a new multi -purpose building which could span Powis Street from John Wilson to Beresford Street, by this I mean an archway over Powis Street. The Ground, 1" and 2nd Floors would be retail. The 3rd & 4th Floors would be social, Cafes, Cinemas, Pubs, Wine Bars, Restaurants and other Social Interaction Venues. All floors above the 4th, I would suggest either 10 or 12 Floors in all, would be Offices. These offices would command premium rents because of the River views on the northern side. If this was achieved then many other good quality businesses would follow all around Woolwich. 4 .3.15. (Eltham Town Centre): Please exercise caution when considering changing Eltham. It works as it is and I would hate to see it destroyed , as Woolwich was, by pedestrianisation and traffic restrictions. Please remember, if it works let it be. I would not mind seeing changes in Eltham, but it really is quite a pleasant place to shop as it is. 4 .3.22 . (Greenwich Town Centre): This is the biggest problem that the Borough faces, the transport difficulties in Greenwich Town Centre. Without a Road Bypass built on the River I cannot see that you can do much about the traffic congestion . However, it might be worth enquiries to find out if the Student Accommodations could be let during their holidays for tourist use. Overall I think that you have, with the exception of the few comments that I have made above, made a very reasonable and workable plan for all of the District Centres. I can find very little fault in this	Policy TC(c) is aimed at restricting the location and concentration of hot food takeaways.

							Chapter of the Plan at all. 5.3. 12. & Policy TC(d): Please refer to my comments later in 4 .7.18 where I advocate the abolition of all planning permission for unhealthy fast food outlets in the whole Borough . If, as you admit in Policy TC(d) that these outlets are unadvisable for school children, then surely this applies to the population in general and that ALL OF THESE OUTLETS SHOULD BE DISCOURAGED ON HEALTH GROUNDS.	
DCS78		Berkeley Homes	Berkeley Homes (Urban Developments) Ltd	Bob	McCurry	Barton Willmore	Policy TC2: Woolwich Town Centre 4.27 The draft Policy seeks to ensure that Woolwich re-asserts itself as a major centre and is eventually reclassified as a Metropolitan centre. 4.28 The regeneration of the Royal Arsenal presents the opportunity to enhance and support the vitality of the Town Centre and meet the needs of existing and future residents, particularly through the provision of retail around the proposed Crossrail Station. However, whilst we support the general approach of this policy, we consider that the focus of providing a new retail offer should be contained around the proposed Crossrail Station, General Gordon Square and the existing High Street and this should be reflected within Policy TC2. Policy TC7: Local Centres and Neighbourhood Parades 4.29 Vibrant local centres and neighbourhoods are vital to the long term sustainability of new developments and we support the need for a Local Centre at Kidbrooke to provide for the day to day needs of local residents.	Within Woolwich town centre it would be inappropriate to specify that new retail development should be confined to the environs of the Crossrail station. The Woolwich Town Centre SPD specifies where retail development is supported.
DCS52			Greenwich Hospital	Neil	Lucas	Drivers Jonas Deloitte	Greenwich Hospital's principal commercial interest within the Borough is around Greenwich Town Centre and it supports Policy TC1 and TC4. In particular, Greenwich Hospital supports the promotion of developments that will encourage tourists to stay longer, through an improved range of accommodation and evening hospitality and leisure offer. The regenerated Greenwich Market will help achieve these objectives. Greenwich Hospital has a variety of additional land holdings in the Town Centre and supports the recognition that diversity of appropriate development in Greenwich Town Centre will enhance visitors' experiences of Greenwich and will benefit the Borough's economy through increased expenditure. Greenwich Hospital also notes that the document identifies the important role of established markets as an important part of Greenwich Town Centre, due to their unique and specialist offer as well as a popular attraction for visitors. Greenwich Hospital's aspirations for the regenerated and temporary markets reflect and will enhance these important roles. Indeed, Greenwich Hospital has developed a retail strategy for the market and surrounding retail units in consultation with the local community to preserve the	Support noted

							current feel of the market.	
DCS47			Tesco Stores Ltd		Russell	Nathaniel Lichfield & Partners Ltd	Support is given for the objective in Policy TC2 of Woolwich Town Centre re-asserting itself as a Major Centre in South East London, improving the quality and quantity of its retail offer and clawing back trade that has previously been lost to other centres. Tesco like the Council will be supportive of development that contributes to the eventual reclassification of Woolwich as a Metropolitan Centre and that Woolwich will accommodate the majority of additional town centre development in the Borough over the plan period	Support noted
DCS66	Philip	Binns	Blackheath Society				Section 4.3 Town Centres Introductory comment We question whether the Draft Core Strategy fully responds to Strategic Objective F - support for the Borough's network of town centres, particularly Woolwich and Eltham, and the mix of uses within them. We are concerned that the implementation of the Strategic Policies relating to town centres, on which their future success will be judged, is vague. We are also concerned that although response to the previous round of consultation (Core Strategy Issues and Option) identified the prevention of crime in the Borough's town centres, this issue is not addressed in either the Strategic Policies section of the Draft Core Strategy or in the Development Management Policies section of the document. There is a reference on page 81 to the positive effect of enhanced town centres - a reduction in the need to travel. We consider that it is only when there is a significant development, similar say to that at Canary Wharf, that this can be achieved. It is unrealistic to believe that the upgrading of any of the Borough's major centres can be of this nature and the need to travel to and from the town centres will remain. We support the theory that the enhancement of the Borough's town centres should help in reducing the loss of market share to neighbouring boroughs but, if the intention is that the improved town centres will attract trade and investment from outside, this is unrealistic. The neighbouring boroughs will all have their own development aspirations for their own town centres. We note that, at Para 04.3.1, and elsewhere throughout the document, Greenwich town centre is referred to in the same breath as the major shopping centres at Woolwich and Eltham. Has any consideration been given to upgrading Greenwich town centre from a District Centre to a major centre? Policy TC1 Town Centres At Para 4.3.6, we question the relevance of referring to the sequential approach for determining where new town centres should be located, as advocated in PPS4. This is unrealistic in such an urbanised Borough. Additional shopping facilities are likely to be	Designing out crime is covered in Policy DH1 Design. Crime is also covered in Policy CH1 Cohesive Communities. Encouraging mixed use schemes in town centres can reduce the need to travel. It is important for retail developments to be assessed against the sequential approach to ensure that new retail developments are focused in our Town Centres. Major Centres are designated in the London Plan. Greenwich town centre does not meet the required criteria.

							associated with major new developments such as on the Greenwich Peninsula and at Kidbrooke. There is not the opportunity for out of centre locations. We recommend that, at both 4.3.32 and 4.3.34, where there is a reference to the Blackheath District Centre and the Lee Green District Centre, it is made clear that, at both locations, the major part of the shopping offer falls within the adjacent borough (Lewisham). In respect of the Lee Green District Centre, there should be a reference to the study undertaken by Design for London in 2010 identifying Lee Green as one of seven centres for housing intensification aimed at dealing with the area's poor quality environment and declining shopping experience. Either in this section or in section 5.3 Town Centres, the Draft Core Strategy should explain that Major Centres and District Centres are made up of core and fringe elements. We suggest that, within the Town Centre section of the Draft Core Strategy, some reference is made to the potential for considering other uses for vacant upper levels of retail premises. Residential use would provide out-of-hours activity and surveillance. Section 5.3 Town Centres Policy TC(a) Core, Fringe and Local Shopping Frontages In assessing the percentages of retail use at ground floor level, we recommend that, in the case of the Blackheath District Centre, note is taken of the percentages of retail use in the adjacent borough (Lewisham) directly opposite to the core element in Blackheath Village and the fringe element in Lee Road, to achieve a realistic solution.	
DCS73	Alison	Harris	Eltham Town Centre Partnership				The Core Strategy designates Eltham as a Major Centre. Paragraph 4.3.7 says that Major, District etc are listed in Tables 5.1-5.3. However, Major Centres are NOT listed. Therefore there is no definition of the extent of Eltham (although, it is on the Proposals Map, which is not included in this consultation) . Presentationally, there is some concern that Eltham is subsumed into the "south of the Borough" on the area map, rather than being clearly identified in its own right. Statements in support of the policy on Eltham (TC3) make statements such as There is limited capacity for further comparison goods provision particularly in the early stages of the plan period as the Centre already has a good comparison offer and Eltham has a below average convenience retailing provision and would benefit from a broader convenience offer in the form of a more modern, larger store. The Partnership questions these statements as they are based on the unpublished Greenwich Retail Capacity Study 2008 (since when convenience provision has increased). We have a number of convenience stores in the town centre and, although there is a variety of comparison stores, the centre still lacks certain types of stores and would benefit from a greater mix. Town centres (including Eltham) are about more than retailing. Although TC3 talks about improving the range of restaurants and leisure facilities, there is no mention of other employment such as offices or workshops, which should be encouraged. The need to ensure adequate parking provision within the Town Centre for workers and visitors should also highlighted in TC3. From a Partnership point of view, there is mention of the Eltham Regeneration Agency to provide vision, direction and leadership in overseeing regeneration projects in Eltham Town Centre as well as the wider Eltham area but no mention of the Eltham Town Centre Partnership, which also works for that, involving local businesses, police, community groups etc (TOR attached for information).	The retail frontages for Woolwich, Eltham and Greenwich are shown on the Proposals Map Inset Maps. Paragraph 4.3.7 has therefore been amended.

							The Partnership strongly advocates the need for a "Vision Document" to help shape future town centre development in a coordinated approach.	
DCS81	Linda	Hodgson	Heathway Residents Association				There are a number of mentions of the Royal Standard, Blackheath Standard and Blackheath throughout the document. It is not entirely clear if these are considered separate locations or are in fact the one and same. It would be helpful if this could be reviewed and clarified to avoid confusion and ensure recognition of the Standard area as an important locality. Local Centres & Neighbourhood Parades p90 Bullet 1 - Blackheath Standard We support and would like to promote Blackheath Standard as a Local Centre and Neighbourhood Parade meriting active improvement p155 Table 5.1 District Shopping Centre Frontages .. Royal Standard! â^' are the Numbers for Vanbrugh Park correct in this table?	The two centres referred to in the Core Strategy are Blackheath District Centre and Royal Standard Local Centre. Addresses are included in Core Strategy tables 4.1 and 4.2 respectively.
DCS90	Mrs	Abraham	Mansoor				What difference have taken place in the market area. It's crowded. Eight betting shops in a single area of Woolwich.	Policy protection relating to saturation of betting shops in protected retail frontages is now referred to in Policy TC(b).

Question 12 – Design and Heritage – Do you have any comments?

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DCS4	Lucy	Owen	Port of London Authority				Policy DH1 Design: It is questioned why given the riparian nature of the borough, the emphasis on riverside development in the Core Strategy and the long list of bullet points that developments will be expected to adhere to that there is no reference to using the river for the transport of construction materials to and waste materials from development sites where practicable. The use of the river in this way would accord with planning policy, see for example policy 4C.8 of the London Plan which seeks for new development close to navigable waterways to maximise water transport for bulk materials, particularly during demolition and construction phases. Policy DH2 Tall Buildings: Given the many recent discussions between the PLA and the Council concerning applications for Tall Buildings and the potential for them to cause detrimental impacts on the PLA's navigational systems it is surprising that there is no reference in either the policy or in the supporting text to tall buildings needing to be in appropriate locations and that early discussions will be required with the PLA about this matter. Policy DH(j) Thames Policy Area: Pleased to see the reference to incorporating sustainable modes of passenger, freight and tourist transport as appropriate and the reference to avoiding unnecessary encroachment to the river and its foreshore. However, it would be beneficial to make it clear that river related uses are an exception (as set out in paragraph 5.4.9). Clarification should be provided on what is meant by 'water foreshore recreation' as there are health and safety and environmental issues that can occur with access to the foreshore.	It is not felt necessary to include reference to transporting construction materials in Policy DH1 as it goes beyond the scope of the Core Strategy. The emerging Greener Greenwich SPD will include detailing the transport of construction and demolition wastes. The Tall Buildings Assessment investigates the appropriateness of tall buildings in different areas of the Borough. The findings of which are represented in the updated Policy DH2 and the supporting text. It is not felt necessary to include specific reference to consulting early with the PLA about proposed tall buildings. Stakeholders will be consulted as appropriate depending on the application in line with the Council's Statement of Community Involvement. Support for policy on the Thames Policy Area is welcomed. The text in the policy already covers encroachment into the river and it is

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								mentioned further in the supporting text.. It is felt that this is clear and sufficiently addresses the issues around encroachment so nothing further has been added.
DCS12	Isabel	Assaly	Natural England				Policy DH1 - Design IV - Achieve accessible and inclusive environments for all, including disabled people We recommend that Areas of Deficiency in Access to Natural Greenspace should also be considered within this policy point. XVI - Demonstrate measures that reduce surface water flood risk We recommend that explicit reference to Sustainable Urban Drainage Systems (SUDs) should be made under this point. SUDs refer to a range of systems, including green roofs and walls and flood attenuation basins which can regulate surface water flow and improve site resilience to flooding.	It is not felt necessary to amend the wording of DH1 IV as it is sufficiently broad but access to open spaces is further discussed in the emerging Open Space Strategy. Landscaping with permeable surfaces has been moved from the Housing Design policy to DH1 because it should not just apply to housing developments. Living roofs now has its own policy E(f) and cross reference in Policy DH1. Requirements for SUDS are set out in London Plan Policy 5.13 and are referred to in Environment and Climate Change chapter of the Core Strategy.
DCS13	David	Kerr					Policy DH1 Design (page 94 et seq) (Formerly UDP Policy D1) I welcome the level of detail embraced by this policy but suggest that most and perhaps all detail is not appropriate in a strategic policy. Please consider transferring the detail to a development management policy. It would be helpful to specify which proposals require a design and access statement. In the UDP this information is at Policy D2. This is a significant omission. I welcome para 4.4.5. Please consider expanding this so that, for example, minimum garden size which is absolutely appropriate in many parts of the borough is not prayed in aid to permit over-development elsewhere and particularly in conservation areas. Policy DH3 Conservation and Heritage (page 98) Please note a potential major weakness. The UDP at Policy D16 enabled tight control of development in conservation areas, and at Policies D18 - 022 the UDP enabled tight control of development affecting Listed Buildings. Policy DH3 and the supporting material are no more than motherhood and apple pie statements. Policy DH3 will not enable development control. PPS 5 contains very general national policy but does not contain any statement of what types of development should or should not be permitted in heritage areas. The approved conservation area Appraisals/Management Strategies contain recommendations but do not contain development policies. The emerging conservation area Management Strategies do not even contain a full list of relevant planning policies. Unless the material in the UDP is replaced by matching material in the Core Strategy it will be extremely difficult to control development in conservation areas until a SPD has been produced for each of the 20 conservation areas. As yet, no SPDs have been prepared to support the conservation area	DH(c) – Agreed and have now included additional text on the health implications of telecommunications development. The Design and Heritage section of the Core Strategy now includes development management policies on Statutory Listed Buildings. Conservation Areas – the wording 'pay special attention to' has been included in the policy as it makes the policy consistent with the wording of the legislation and forms a solid basis for assessing planning applications. All applications need to be supported by a design and access statement, not just those in Conservation Areas.

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							management strategies approved in 2007. (Please read foregoing comments in conjunction with later comments on Conservation Areas) Policy DH(c) Telecommunications Development (page 162) It is potentially unhelpful to have omitted the para covering concerns about health risks (UDP page 115 para 6.23). Please consider reinstating this. Policy DH(h) Conservation Areas (pages 166/167) Delete heading "Character and Setting" and replace by "New Development". Immediately below existing heading "Character and Setting" delete: "which pay special attention to the desirability of" The existing wording at UDP Policy D)16 is more positive, stronger and less ambiguous. 5.4.20. Please mention here that conservation area appraisals and management strategies are meant to lead to preparation of a supplementary planning document for each conservation area. Management strategies approved in 2007 are not yet supported by supplementary planning documents (and recommendations for Article 4 Directions have not yet been implemented). 5.4.21. This is probably an appropriate place to state that a development proposal for a site in a conservation area should be supported by a design and access statement. 5.4.24. PPS 5 contains an instruction not to duplicate PPS 5 wording in regional and local planning policy documents. However, please read PPS 5. It does NOT contain wording which will protect Listed Buildings. Unless existing UDP Policies D)18 - D)22 are added back into the draft Core Strategy Listed Buildings in the Borough will be unprotected.	
DCS22			Novalong Limited	Richard	Jones	Planning Perspectives LLP	Whilst Policy DH1 relating to design is generally worded in a flexible way, Paragraph (xii) expects brown or green roofs or living walls to be incorporated to the German FLL standard. This is far too prescriptive and should be deleted as a requirement. More generally, it is noted that in the Reasonable Alternatives section relating to Design and Heritage, comment is made that Policy DH1 goes beyond the draft Replacement London Plan requirements. This is not justified.	The requirements for living roofs set out in DH1 are now included in the policies of the Environment and Climate Change section of the Core Strategy and the German FLL standard is no longer referred to and has been deleted as suggested.
DCS24	John	Franklin	Greenwich Society				STRATEGIC POLICIES The section on design and heritage contains a very comprehensive range of ambitious objectives which the Greenwich Society strongly endorses. They are particularly important for a borough which is planning for substantial growth over the next 15 years. The face of Greenwich is set to change irreversibly and in profound ways. For generations to come the success of this development will be judged in large measure by how far it has respected the historical legacy and achieved high quality design in the new buildings, the infrastructure and the public realm. Policy DH1- Design: Policy DH1- Design. We strongly support the requirement for 'high quality design', but feel this is too open to interpretation and needs defining. We would suggest the following wording, or similar: ''High quality of design' is defined as the meeting of recognised high standards of architectural form, relationship and appearance 'and fitness for purpose'. 'Form' includes simplicity, elegance of structure and proportionality; 'relationship' includes the relationship of both parts of a building(s) to each other, and the relationship of the building(s) to the surrounding area; and 'appearance' includes general harmony, satisfaction and delight in the visual perception of the development. 'Fitness for purpose' means appropriate design to reflect and express the use of the building.' We would suggest that the policy should go on to state, 'Planning applications will be assessed on the above with qualified architectural expertise.' We endorse the 17 objectives listed under DH1; but consider that greater precision in some of them would increase the chances of compliance by applicants for development. For example, how is local distinctiveness (ii) to be judged, and what sort of development or landscaping along the riverfront would be judged sensitive to its maritime coastal nature and its industrial heritage (4.4.4)? We believe that distinctiveness is just as much a feature of town centres like Woolwich (4.4.5), even if it has been under pressure from unsympathetic development for half a century, as in lower density areas, and needs to be taken fully into account in any new development. How will the Council follow up the objective (xv) - for developers to obtain raw materials from sustainable sources? To what extent will the environmental	It is agreed that the view southwards along Blackheath Avenue away from General Wolfe Statue warrants being included as one of the Local Views in policy DH(g). The proposed definition of 'high quality of design' is not felt necessary to include in the text. Other suggested changes to text to make them more stringent are not felt to be appropriate. It is felt that we do not need a specific policy on solar panels and wind turbines. Other concerns put forward in the response are noted but no additional changes are proposed.

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							sustainability measures listed in 4.4.7 be requirements for approval of new development and, if not, how will they be promoted? Reference is made in (iii) to 'Secured by Design', 'Designing out Crime' and 'Safer Places' ' and in (ix) to 'BREAM rating of 'outstanding' , with no mention of places to go to find these references. We think that it would be helpful if these references could be included in the Appendix. Policy DH2 - Tall buildings. We welcome the policy of confining tall buildings to a small number of specified areas. We regret that the criteria contained in the present UDP High Buildings policy D28 have not been carried over into the draft Core Strategy, and we recommend that this should be done. We note that the definition of a tall building is one which is substantially taller than its neighbours or changes the skyline. This leaves scope for new, taller buildings across the rest of the Borough which, while not counting as 'tall buildings' under the definition, may have a negative impact on their neighbourhoods and on more distant views. We would like to see the policy expressed as a presumption against buildings which exceed the local height norm, linked with a more rigorous examination of all proposals which would do this. Even in the selected areas, tall buildings need rigorous justification against land use, design, economic and social and sustainability criteria. We think arguments in their favour such as 'catalysts for regeneration', 'iconic' and 'landmark' are largely meaningless and should not be given weight. DH3 - Conservation and Heritage. We are surprised and concerned by the brevity of this section considering the extent and significance of designated heritage sites and listed buildings in the Borough - and hope this is not an indication of the priority which the Council will give to conservation and heritage. We are pleased at the commitment to preserve and enhance the Borough's 20 conservation areas, but would ask, where is the programme for this and what the time scale? No mention is made here of the Borough's heritage of Locally Listed buildings, and although Policy DH(i) covering Locally Listed buildings is included in the Development Management Policies section, we would like to see reference to the Council's 10.000(?) Local List buildings included in this policy. More importantly, we consider that the wording of this Policy should be strengthened by including the wording in UDP Policy D16 - Conservation Areas. We also consider that it would be helpful to include here the Map of the Borough's Conservation Areas, Map 8 (p.119) in the UDP. Suggest insert, separate Policy - Listed Buildings: We consider that there should be a specific Policy on Listed Buildings included in the Core Strategy, to follow Policy DH3, or Policy DH4, taking in the wording at present contained within UDP Policy D18. In our view this is an important omission which must be remedied in the next version of the document. DH4 - Maritime Greenwich World Heritage Site. We support this statement of the importance of the WHS and of the arrangements in place for managing its conservation. But there is a lack of clear objectives, eg for the timing of the review of the Site Management Plan and promotion of objectives. We understand that the Council is considering abolishing the WHS officer post and some indication is needed of how, in these circumstances, necessary coordination between the bodies on the site and the initiation of action will be achieved. The appearance of parts of the Town Centre continues to cause us concern - garish shop fronts, proliferation of A-boards on the pavements, neglected upper stories and some unnecessary or unattractive signing. More effective use needs to be made of the Article 4 direction, and the role and powers of the Town Centre forum should be reviewed. Town centre management is another area where local voluntary interest and energy might be given greater scope. DEVELOPMENT MANAGEMENT POLICIES We warmly support the policies in this section, but would make the following comments: Policy DH(a) ii.: We are concerned at the statement, 'Flat roofs will not be accepted on side or rear extensionsâ€¦.': there may be cases in where this might be perfectly acceptable: and we would suggest the use of the wording in the current UDP, viz. 'In most cases pitched roof will be required on side or rear extensionsâ€¦.' Suggest insert re Solar panels and wind turbines: Following Policy DH(d) - Satellite Antennae, we feel there should be inserted a new	

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							Policy to cover the use and location of solar panels and wind turbines. This new technology, whilst to be supported as contributing to environmental sustainability, nevertheless can have a damaging effect on the character of areas, particularly of relevance within conservation areas on Local listed buildings which are not protected by statute, and we consider this needs covering by approved Council Policy. Suggest insert re Street furniture: We query why Policy D14 in the current UDP has been omitted from the replacement Core Strategy. We consider this also an important omission, as street furniture pays a vital role in the street scene. Policy DH(g) - Local Views: Whilst supporting the views included in this policy, we would draw attention to the view looking southwards along Blackheath Avenue away from the General Wolfe statue with a vista of All Saints Church Blackheath on axis. This is part of the 'Grand Axis' stretching from Blackheath Gate at the south end of Greenwich Park to the River Thames, the best example of axial planning in this part of London. We would hope that Map 1 - Local Views in Policy DH(g) might be of the same quality in the final approved Core Strategy document as Map 9 in the UDP. Suggest insert re Strategic Views: We query why Policy D25 - Strategic Views in the current UDP has been omitted from the draft Core Strategy. We consider this also to be an important omission needing to be rectified by inclusion either within Policy DH(g) as 'Strategic and Local Views', or as a separate policy preceding Policy DH(g). Suggest insert re Policy on Historic Landscapes: Here, again, there appears to be an important omission - and we wonder why Policy D24 in the current UDP has been left out here: we urge that it be included.	
DCS25		Waite					Tall buildings should be resisted, and views to/from the river respected. Extensions (5.4.1, 5.4.5, 5.4.6) amenity light and privacy values for existing residents should be preserved. Cramming in more people raises stress levels and is detrimental to health. Gardens (4.4.8) must be preserved, greenwich is in danger of becoming a 'battery hen' area. Conversion of houses to flats should be resisted. It destroys heritage and communities.	Policy DH(b) protects the amenity (including privacy) of adjacent occupiers when applications for residential extensions are considered. Policy DH(g) protects recognised Local Views and the supporting text refers to designated views in the London Plan which are also required to be protected. Disagree that conversion of houses to flats destroys heritage and communities as conversions can be a valuable source of new housing in the borough. However, it is worth noting that Policy H(b) protects existing small and medium sized family homes while acknowledging conversions of appropriate large dwellings can assist in balancing the type and size of dwellings to population needs. Policy DH2 identifies areas in the Borough that may be appropriate for tall buildings. Well designed tall buildings can potentially create landmarks for an area and the intensification of use that they provide can act as a catalyst for regeneration that can be valuable for a town centre.

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DCS29		Mayor of London	Greater London Authority				DH1 The GLA supports the principles in the policies. The only issue we would raise is to potentially amend iii. To say 'takes in account the principles of ' rather than is 'consistent with the principles contained in Secure by Design, Designing Out Crime etc' as some of principles in Secure by Design and Designing Out Crime are not always complementary to each other and therefore it would be difficult to be consistent with both. The Council's requirement for developers to demonstrate on-site waste management is welcomed; this should be required to be in the form of a Site Waste Management Plan. Greenwich's Core Strategy should also require developers to arrange for efficient materials and waste handling, and require waste to be removed from the site, and materials to be brought to the site, by water, or rail transport wherever that is practicable. DH2 The GLA supports the identification of appropriate locations for tall buildings, although it may also be useful to identify these locations on the Key Diagram. The GLA does however have some concerns in relation to how the areas inappropriate for tall buildings is expressed in that the phrase 'tall buildings are inappropriate in areas with a visual relationship to Designated Heritage Assets or Areas of Special Character' is ambiguous. The supporting text refers to whether there is a strong visual relationship, a limited visual relationship or no visual relationship. However it is unclear whether a limited visual relationship would mean it would or would not be appropriate. DH3 Whilst the GLA supports the principles of DH3, it would be useful for the policy to include a reference to Heritage Assets rather than simply Conservation Areas and Listed Buildings. This would then be more consistent with paragraph 4.4.15 in relation to PPS5. Also it may be appropriate to change 'protected' to 'conserved', as they have different nuances. Conserved means to manage, ensuring the significance of assets are protected whilst allowing change, whereas protected means that to keep the same which in the context of settings may not necessarily be what is desired. DH4 The GLA supports the policy.	The wording in DH1 has now been amended to better reflect the London Plan. Policy IM5 supports rail/waterborne freight. A map showing areas where tall buildings are appropriate should be included. Reference to inappropriate areas should be deleted. DH3 is now retitled Heritage Assets and has been amended to better reflect the NPPF. Support for DH4 welcomed
DCS33	Caroline	Evans					DH 1 (i) in Section 4 gives importance to using a high level of design to achieve the best possible relationship between proposed and existing buildings. DH 4 (4.4.18, and 4.4.21) refers to the need for sensitive design in the buffer zone affecting the setting of the Greenwich World Heritage Site. The recent and current developments along Greenwich High Road (the main entry point to the Borough and the World Heritage Site from the South West) have suffered from the lack of a coherent planning approach to this extreme western edge of the Borough, and have been of distinctly variable quality. These, and the other, planned, developments pose a serious and ongoing risk to most of the pre-1914 built heritage along Greenwich High Road. Some kind of neighbourhood plan for the OA7/Creekside, Greenwich High Rd, Norman Rd area is long overdue - and still urgently needed. The Draft Core Strategy seems to assume that most of the significant sites in the OA7 area have already received planning approval. This is not so. Given the substantial number of planning decisions still to be made post-2012, many in Greenwich, others in Lewisham, the acknowledged planning pressures in the Creek area, and the need to develop the specific cross-Creek opportunities envisaged, there is a strong case for residents and the Borough committing to an OA7 SPD.	Although joint preparation of an SPD for the Creekside area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage. Other comments noted.
DCS38	Metropolitan Police Authority		Metropolitan Police Authority	Brian	Coughlan	CGMS Consulting	Policy DH1 Design Section (ii) of this policy refers to: Secured by Design, Designing out Crime, and Safer Places. The MPA/S commend this approach to good and safe design and strongly support this section of the policy in the adopted version of the document.	Support noted. The security and safety design elements have been relocated to the policy section on Cohesive and Healthy Communities.

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DCS40	Clare	Kemsley					I live on Greenwich High Road and feel strongly that there should be appropriate detailed long-term plans for the area's development. In particular, we need a supplementary planning document for the immediate area. I make particular reference to the two strategic objectives of the Draft Core Strategy: * 'to protect and enhance Greenwich's rich natural and built heritage' * 'to promote high quality architecture and urban design in all developments in Greenwich'. It's important that Greenwich High Road sees effective implementation of these objectives. A lot of piecemeal development has already happened or been planned, and I don't think that it all meets these criteria. However, we should not assume that it's too late to implement more appropriate planning. Immediate steps should be taken to make sure any further development is planned and controlled with a supplementary planning document or equivalent neighbourhood plan. The architectural character of the area should be improved (or maintained where appropriate), rather than worsened by development. And it must have a positive impact on the experience of current and future residents. I am keen to continue living on Greenwich High Road and I hope that new developments retain what's good about the area, and make real improvements where necessary. However, we can't rely on piecemeal planning to achieve this. I have strong concerns that without appropriate long-term planning, it may deteriorate as a residential area rather than improve. I hope the council is able to ensure that a supplementary planning document is produced for our area.	Although joint preparation of an SPD for the Creekside area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.
DCS42			Greenwich Peninsula Regeneration Ltd	James	Wickham	Gerald Eve	Policy DH1 - Design We have similar concerns regarding Policy DH1 as expressed regarding Policy H5. The Policy should recognise that there will be a need to balance achieving the aspirational targets set out against the actual delivery of new development, which can provide new employment opportunities for residents of the borough. We therefore suggest that Policy DH1 be amended as follows: 'A high quality of design will be required in all developments, including redevelopments and alterations to existing buildings. Where appropriate, it will be necessary to demonstrate that such developments positively contribute to the improvement of their accessibility, safety and the built and natural environment. Development proposals should be of a high quality design and, where appropriate and practical should seek to: The Council will apply this policy flexibly, having regard to promoting rather than discouraging development within the Borough.' Policy DH2 - Tall Buildings We strongly support the recognition in Policy DH2 that the Greenwich Peninsula is an appropriate location for tall buildings. This is a sensible and pragmatic recognition of both the extant planning permission for tall buildings on the Peninsula and the future longer term potential for additional tall buildings to be delivered in this area.	DH1 will not hinder development. The Borough has expected a high standard of design in previous development plans and has continued to see significant growth in previous years. The need for additional housing and anticipated growth can not be at the expense of good quality design. The Council will work with developers such as those on the Peninsula to ensure that development is viable but also built to a high standard. Support for DH2 noted. Further explanation will be available in the Tall Buildings Assessment which examines the different areas of the borough and the support text of the policy has been updated to better reflect the findings of the Assessment. The Tall Buildings Assessment will be published as part of the Core Strategy's evidence base.
DCS43	Barbara	Reid					DH 1 (i) in Section 4 gives importance to using a high level of design to achieve the best possible relationship between proposed and existing buildings. DH 4 (4.4.18, and 4.4.21) refers to the need for sensitive design in the buffer zone affecting the setting of the Greenwich World Heritage Site. The recent and current developments along Greenwich High Road (the main entry point to the Borough and the World Heritage Site from the South West) have suffered from the lack of a coherent planning approach to this extreme western edge of the Borough, and have been of distinctly variable quality. These pose a serious and ongoing risk to most of the pre-1914 built heritage along Greenwich High Road. A neighbourhood plan for the OA7/Creekside, Greenwich High Rd, Norman Rd area is urgently needed. The Draft Core Strategy seems to assume that most of the significant sites in the OA7 area have already received planning approval. This is not so. Given the substantial number of planning decisions still to be made post-2012, many in Greenwich, others in Lewisham, the acknowledged planning pressures in the Creek area, and the need to develop the specific cross-Creek opportunities envisaged, there is a strong case for residents and	Although joint preparation of an SPD for the Creekside area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

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							the Borough committing to an OA7 SPD.	
DCS86	Claire	Craig	English Heritage - London Region				Strategic Policies Policy DH1 Design - English Heritage requests that the design for a development be demonstrably credible financially and technically. Policy DH2 Tall Buildings - English Heritage requests that the Borough identify areas for tall buildings that are appropriate, sensitive and inappropriate rather than inappropriate and possibly appropriate as currently conveyed. Policy DH3 Conservation and Heritage - this policy currently does not cover anything that is not covered by PPS 5. English Heritage recommends that the policy is retained and developed into something more locally specific that is built on a positive and proactive strategy for all of the London Borough of Greenwich's historic environment in all its forms, natural and built. Policy DH4 Maritime Greenwich World Heritage Site - English Heritage requests that the word 'protect' is replaced with the word 'conserve' in keeping with PPS 5. We also request that references to 'values' are expanded into Outstanding Universal Value (OUV) in every instance in the policy. By way of an update for paragraph 4.4.18 we can advise (to replace the existing information in this paragraph) that 'A draft Statement of Outstanding Universal Value was submitted in January 2011 by the UK government to the UNESCO World Heritage Committee for approval; the draft sets out Statements of Significance, Authenticity, Integrity and Protection and Management requirements and was amended following a period of public scrutiny. It incorporates the Statement of Significance as agreed by the World Heritage Committee in 2008.' On a general note, when using the phrase Outstanding Universal Values, we request that it always appear with the initial letter capitalised. Furthermore, we request that the Maritime Greenwich World Heritage Site's setting is always incorporated in statements about the need to conserve and enhance the site. Development Management Policies Policy DH(c) Telecommunications Development - we recommend that the word 'preserve' currently used in paragraph iii of this policy be amended in keeping with PPS 5 to 'conserve'. Policy DH(e) Shopfronts and Signs - we recommend that, where possible, grilles be mounted on the inside of glazing of the shopfront rather than the outside. Policy DH(f) Advertisements - we recommend that the phrase 'or its setting' be added to the end of paragraph i of this policy. Policy DH(l) Archaeology - we recommend that references to 'preserve' and 'preservation' be amended to 'conserve' and 'conservation' in keeping with PPS 5. We request that sites be added to finds in the last sentence of the first paragraph of the policy.	DH1 - It would be inappropriate to insert text into the policy ensuring a proposed design needs to be financially credible as it would hinder the negotiations between the applicant and the Council around scheme viability and potential s106 contributions. Further work has been done on the Tall Buildings Assessment to support Policy DH2 to make it clear which areas may be appropriate for tall buildings. Since the last round of consultation, drafts of the Assessment have been shared with English Heritage officers. It is expected that the TBA will be published along with the proposed submission version of the Core Strategy. Policy DH3 has been amended in light of these comments and the follow up meeting held with English Heritage in March 2011 to more clearly demonstrate that the heritage of the Borough goes beyond just the buildings and includes the landscapes as well. DH4 – Agreed. Outstanding Universal Values will be written in capitals as requested. DM Policies – amendments made to policy wording as requested, except shopfronts and signs policy which already included sufficient information about the location of security grilles.
DCS69	Laurie	Baker	Eltham Society				The Society fully endorses policy DH1, which needs to be carried forward through implementation. The Society would certainly not see the south of the Borough as an appropriate location for tall buildings (DH2) and that local views must be maintained (DH (g)). Generally we welcome the policies DH (a) to (l). A separate policy on Local listed buildings (DH (i)) is very welcome and the Society is and will be actively involved in suggesting further buildings.	Support for Policy DH1 is welcomed Support for DH2 noted. Further explanation will be available in the Tall Buildings Assessment which examines the different areas of the borough. The Assessment will be published as part of the evidence base alongside

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								the proposed submission version of the Core Strategy. It is also worth noting that a policy on statutory listed buildings has now been included in the core strategy.
DCS84	Anna	Townend	Greenwich Environment Forum				Restore the old Greenwich has huge role in cultural/heritage terms. Good design is vital in new build. The post of urban designer needs to rapidly become mainstream in LBG's staff analysis and appointments. The post of independent WHS Heritage Officer - Architect specialist must be retained and Ecologist urgently created as other London Boroughs have done	Agree that good design is vital in new build. The Core Strategy's policies will ensure that good design is carried out over the next 15 years.
DCS75	Paul	Maloney	Langton Way Residents Association				Langton Way is an un-adopted, un-metalled narrow roadway located between the gardens of Shooters Hill Road and St John's Park. It is subject to fairly continuous development, typically with one or more new builds in progress in any given year. There is a long history of development of the rear of the gardens of the grade II listed houses on Shooters Hill Road, and the rear of the gardens of the large detached houses on St John's Park: these developments front onto the un-adopted and un-metalled road Langton Way. The tradition has evolved over the last 50 years of generally high quality contemporary architectural designs, of a modest scale, which add to the quality of the environment and help to reinforce the semi-rural nature of Langton Way. These and other unique features of Langton Way were recognised in its designation as an Area of Special Character of Metropolitan and Local Importance, and a special Langton Way Planning Brief was produced by the Council in 1989. It is also within the Blackheath Conservation Area. The semi-rural nature of this road is dependent on the protection afforded by the planning and conservation processes. Accordingly our association's comments are focused on this topic and we are keen to ensure that the revised planning and conservation processes continue to protect this unusual environment which contributes to the value and diversity of the borough. Policies The key policies impacting development are the Strategic Policies for Housing (H1 - H5) and Design and Heritage (DH1 - DH4); Development Management Policies for Housing and for Design and Heritage. At this level of detail we support the policies as outlined. Our only comments are: There needs to be a sensible differentiation between density in Conservation Areas and that in other areas, such as strategic housing developments We would like to see acknowledgement that lower maximum densities than otherwise specified in the London Plan can be used in locally distinctive areas such as Heathway and Langton Way (as to be specified in their updated Planning Briefs) Policies should ensure better protection of the local scale in Conservation Areas by respecting the local proportions. We believe that Conservation areas need better protection than achieved to date and are concerned that the Core Strategy does not yet do enough to ensure it. We are pleased to note that existing gardens will not be counted as "brownfield" p64 and will thus not be seen as primary sites for meeting the housing targets. We would welcome further details on the response to the public consultation, identifying the need to improve the Royal Standard. p90. We note that public consultation identified the need to "protect and maintain the local character and distinctiveness of the borough" (p93). Although this is not specifically addressed in the policies which follow, we welcome the recent amendments to the Conservation Area Appraisal and also the commitment to update the existing planning briefs for Langton Way and Heathway which are intended to preserve that local distinctiveness.	Support for policies welcome. Agree - text regarding housing densities has been amended to recognise that to preserve the residential character of some Conservation Areas, a lower density may be appropriate.
DCS45	Peter	Rice					design - Policy DH1 - materials - preference for traditional materials as new always date badly i.e. peninsula flats cladding panels poor design.	Noted, the Council will seek high quality design in all schemes with consideration given to the long term impacts of any proposal.

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DCS71		Tilfen	Tilfen Land Ltd	Craig	Blatchford	Blue Sky Planning	Policy DH1 sets out various criteria and targets for new development. Again, Tilfen Land supports the principle of seeking the highest standards in design and sustainability subject to viability issues and the particular circumstances and characteristics of the site. Specifically, Tilfen Land suggests that Policy DH1 should reflect the particular circumstances of different types of development (i.e. residential, office, industrial, etc) and provide a general test of 'reasonableness'. For example: 1) The target of a BREEAM Rating of 'Outstanding' for non residential buildings (ix) will be unviable in the majority of cases in Thamesmead and Abbeywood, etc having regard to the particular characteristics and other costs of development. 2) The potential to incorporate brown or green roofs in industrial and distribution buildings raises significant structural and viability issues which will render such development undeliverable. Policy DH2 relates to tall buildings and identifies various possible locations including Tamesis Point. Tilfen Land support Policy DH2. However, it is noted that the policy may be subject to review pending the outcome of the emerging Tall Buildings Assessment. Therefore, Tilfen Land reserves the right to make further comments as necessary. Policy DH(g) relates to local views and states that development will be granted if it would not have a materially adverse effect on the overall perspective and essential quality of the views. We note that much of the Thames Policy Area falls within identified Local Views. A principle location for existing and proposed tall buildings is on the River frontages. This is reflected in Policy DH2 and the Thamesmead and Abbey Wood SPD. We suggest that policy DH(g) or the explanatory text cross refers to the appropriate locations for tall buildings where they may fall within the Local views.	DH1 – The Council has required a high quality of design in previous development plans and have been able to maintain a high level of growth in the Borough. The strategy's ambitious levels of growth will not happen at the expense of good quality design. The Council will work with developers on schemes as appropriate to ensure they are viable. The Tall Buildings Assessment will be published ahead of the submission version of the Core Strategy and analyses the different areas in the Borough and identifies those that may be appropriate for tall buildings, which are included in Policy DH2. Amendments have been made to the support text for this policy to more clearly justify the areas where tall buildings may be appropriate and categorically state that all other parts of the borough are considered inappropriate for tall buildings. The Assessment was prepared following Environment Heritage/ CABE guidance and drafts were discussed at meetings with English Heritage. DHg – tall buildings that are located within a local view do not necessarily have an adverse effect on that view and can actually improve the view in certain circumstances. Each application would be assessed individually on their merits.
DCS77	Geoffrey	Belcher	Maritime Greenwich World Heritage Site				Policy DH1 Design The use of the term' high quality of design' is questioned. The term demands definition and, if applied to aesthetic issues only, falters on the issue of 'good taste' Considering the extensive (28) list of criteria to be met, which are mostly about local context, welcomed, there seems little point in using the term. There is however a further issue about the list of criteria. It would be most effective if the Borough undertook the initial application of these criteria to establish a site analysis, perhaps as part of the planning application assessment. A planning brief would be welcomed for sites where appropriate. Policy DH2 Tall Buildings 4.4.10 refers to 'Greenwich's emerging Tall Buildings Assessment' which is apparently yet to be undertaken but also quotes in policy 'DH(g): Local Views' a number of selected views ,as illustrated on a Borough map. The only one illustrated on this map in respect of Maritime Greenwich is the 'Docklands panorama from Wolfe Monument'. It is important that further views, as described below, are added. 4.4.11 The term 'landmark' for a tall building is unfortunate and may be used to attempt to justify almost any building. The term is best avoided. Tall buildings in adjacent Boroughs can have a strong effect on Greenwich. Whilst it is understood the Core Strategy cannot extend outside the Borough boundary some reference to this relationship would be expected in any visual assessment. The threat of tall buildings on the Outstanding Universal Values of Maritime Greenwich are of great concern. This led to the preparation of the document (2006) 'Important Views and Tall Buildings' paper which forms an adjunct to the World Heritage Site Management Plan. The document analyses important views on a local and strategic basis , adding to those identified in the GLA London View Management Framework and the UDP. It is disappointing that the Core Strategy does not quote this	The Tall Buildings Assessment will be published ahead of the submission version of the Core Strategy and analyses the different areas in the Borough and identifies those that may be appropriate for tall buildings, which are included in Policy DH2. Amendments have been made to the support text for this policy to more clearly justify the areas where tall buildings may be appropriate and categorically state that all other parts of the borough are considered inappropriate for tall buildings. The Maritime Greenwich World Heritage Site and buffer zone were determined to be inappropriate for tall buildings. DH(g) – An additional Local View has been added to identify the view from General Wolfe Statue towards the All Saints Church in Blackheath which is included in the Important Views and Tall Buildings document prepared by the Maritime Greenwich WHS. The supporting text now also includes reference to Wren's Grand Axis with information sourced from the

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							document and include the views identified within its policy framework. The preparation of the above document has assisted in the containment of a number of tall building proposals around the World Heritage Site, although too late to influence the height of the tower in the Haddo development to the west of the Site. This is now built and spoils the historic scene looking west from Grand Square in the Old Royal Naval College. Policy DH3 Conservation and Heritage Given the importance of the heritage of the Borough , as expressed earlier in the Strategy there would be an expectation of a fuller commitment to its understanding , protection and incorporation within new development. The heritage assets of the Borough are greatly varied and the methods of their assessment will vary accordingly. A methodology needs to be developed which could be on the basis of a 'townscape' (Cullen) assessment. One facet of the Borough's heritage which is not categorised is the riverside. Despite recent developments by the Thames there are stretches of the riverside of great historical interest that survive .These are unrecorded and there is a need for further work to identify historic assets along the River. Some of the recent development schemes have shown a disregard for this historic context yet the existing riverside. A full site analysis is vital starting point for a local design framework. There are a number of tools available for the extension of policy DH3 and it would be appropriate for extending the basic policy on heritage. These include the preparation of more detailed analyses for areas such as the riverside. Planning applications may be strongly influenced by design guidance or planning briefs, as appropriate. Policy DH4 Maritime Greenwich World Heritage Site The policy is welcomed. The Outstanding Universal Values of Maritime Greenwich must be protected, if not enhanced as is indicated. The Government policies on World Heritage Sites, as quoted, refer to the need for Management Plans to be prepared and updated .Although 4.4.23 mentions the Management Plan the links between the Core Strategy and the Plan could be made much stronger. The latter covers many issues that are town planning matters, these leading to objectives which relate closely to Core Strategy policies. The tall buildings issue is a clear example of this. Again it is essential that Policy DH4 is backed up by further work as part of the Local Development Framework which puts the policy into practice. The UDP contains similar basic policies concerning Maritime Greenwich but these did not appear to assist in the assessment of planning applications. The results include the aforementioned tower block in the Haddo development and a number of smaller planning applications around the Site. In addition there have been examples of inappropriate signs and street furniture carried out by the Borough as Highways Authority. The preparation of design guidance and planning briefs, which define the characteristics of a site within the context of the Outstanding Universal Values could have assisted the design work on many occasions. The Greenwich Hospital scheme for Greenwich Market suffered a long process of evolution leading to refusal of planning permission and an appeal, recently decided. This process would have been clarified and shortened if a planning brief had been prepared, identifying the criteria for development. A design guide does exist for Greenwich Town Centre but this is now 12 years old and outdated. The World Heritage Site Management Plan identifies a number of areas where guidance under the Local Development Framework would be beneficial. For example the important group of buildings on the west side of Greenwich Church Street is in poor condition and should be the focus of an improvement scheme. English Heritage have indicated support for such a proposal. Despite the investment that has been made in the World Heritage Site over the 14 years since Inscription there are still areas of neglect. One of the most significant of these is the area between the A2 and Charlton Way, adjacent to the Blackheath Gate to Greenwich Park. This area is managed by LB Greenwich and is known as the 'Southern Gateway' to the World Heritage Site. Charlton Way is the coach arrival point for many visitors and will play a major role in the Olympic and Paralympic Games during 2012.The coordination of the various issues pertaining to this area including coach parking and visitor management would be materially assisted by	Important Views and Tall Buildings document. DH(e) – The policy is sufficiently robust. It has seven criteria that applicants must take account of and the supporting text to the policy refers to the two design guidelines specifically written for Greenwich Town Centre as well as the borough-wide advice note. All other comments have been noted but no further changes to the Core Strategy have been made.

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							the preparation of a brief. The increase in visitor numbers assessed at 1.5 million in 1997 and 10 million in 2010 has generated problems of capacity, damage to historic fabric and visitor management. It is essential that Maritime Greenwich is assessed as a visitor destination with an appropriate public transport system to support it. This should extend from local arrival points by bus, train and boat to more strategic considerations of Crossrail. A recognition of these issues within the Core Strategy would be welcomed. Policy DH(e) Shopfronts and Signs This policy is welcomed but the list of criteria is a pale imitation of the 1999 Shopfront Design Guide. The form of the Core Strategy does not allow the use of drawings or photographs to illustrate the issues. There are tried and tested methods of illustrating good and bad practice used by planning authorities for many decades. Policy DH(h) Conservation Areas The policy as stated appears weak, referring to 'the desirability of preserving or enhancing the character or appearance..' The essential issue is the protection of the character through the preservation and enhancement of the buildings within the area. The Conservation Area Appraisals that have been prepared for the 3 Conservation Areas covering Maritime Greenwich omit detail which should be covered by further study. Policy DH(i) Locally Listed Buildings The policy is welcomed but again appears weak. The essential thrust of the policy should be the protection of the building or structure. The reference to updating the local list is welcomed. It would be helpful to establish the method and frequency of this updating. It may be possible for example to work with local groups to provide information.	
DCS60	Lawrence	Smith	Westcombe Society				Policy DH1 Design of Developments Design of new developments should incorporate measures to minimise the disruption and emissions from movement of goods e.g. proper loading/unloading facilities, facilities for receiving daytime deliveries to residential blocks. Policy DH2 Views and Tall Buildings Stating that Tall Buildings are appropriate in certain areas may be giving the green light to developers. WS would prefer that any statement of areas appropriate for Tall Buildings be removed from the document so that every development is considered on its individual merits. When considering planning applications for developments including tall buildings long distance views of the river and landmarks such as the WHS, Dome and Canary Wharf should be protected. WS strongly opposes isolated tall buildings and tall buildings along the river. Although key views are protected, there is a danger that the river frontage will become a line of tower blocks, blocking or breaking views of the river from other parts of the borough. Also no consideration seems to have been taken of views from the river, and from north of the river towards Greenwich. The river is part of the heritage of Greenwich, it defines much of the borough and is a land mark both for orientation as well as being part of Greenwich's heritage. Views of the river from all areas should be protected by ensuring that there is a mix of height in riverside developments so that the river can still be seen and views are not broken. Policy DH3 Heritage Regeneration should be anchored to the heritage assets of the area whether they be existing design features (even small ones should be considered) or social features in which communities have an existing interest e.g. community assets. Taking care to anchor new development to existing features is more likely to produce diversity in types of area and architecture which will be more likely to foster communities. Policy DH 4 World Heritage Site WS is seriously concerned as to how the WHS will be enhanced without a WHS conservation officer post. We feel that a dedicated officer is essential to protect the WHS which is one of the major assets of the borough.	The Tall Buildings Assessment will be published ahead of the submission version of the Core Strategy and analyses the different areas in the Borough and identifies those that may be appropriate for tall buildings, which are included in Policy DH2. Amendments have been made to the support text for this policy to more clearly justify the areas where tall buildings may be appropriate and categorically state that all other parts of the borough are considered inappropriate for tall buildings. Policy DH3 has been amended to more clearly show that heritage values include elements of both the built and natural environments. Policy DH4 – comment noted but the staffing of the planning department is not an issue for the Core Strategy.
DCS82		Mobile Operators Association	Mobile Operators Association	Carolyn	Wilson	Mono Consultants	We would just like to offer our support to the inclusion of Policy DH(c): Telecommunications Development within the above emerging Development Plan Document. We both welcome the inclusion of this policy within the LDF to facilitate telecommunications development and support its provisions which we find to be generally in accordance with PPG8.	Support welcome. There has also been additions to the support text of this policy regarding the health risks of telecommunications masts.

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DCS56	Chris	Holland	Blackheath Park Conservation Group				Our gravest concern with this section of the document is the lack of special emphasis on Conservation Areas. Various other policies call for special attention to design, but the Conservation Area policy is de minimis. First up, the citation at 4.4 has the unfortunate effect of diminishing the standing of all Conservation Areas except the World Heritage site We propose: "Greenwich's rich historic heritage, secured by twenty Conservation Areas and the Maritime Greenwich World Heritage Site, will have been protected and enhanced "Following this leading paragraph, the first DH policy should be what is now DH3: Policy DH3 Conservation and Heritage Renumber to DH1: 'The historic character, the appearance, and the archaeological value of the Borough's 20 Conservation Areas will be preserved and enhanced, and the almost 1,000 Listed Buildings and their settings will be protected.' Then renumber DH4 (World Heritage) as DH2. Policy DH1 Design Renumber to DH3: This policy is far far too detailed for a strategic policy. It should be based on what is currently the first paragraph, with alterations. Points I to xvii are management policies. We propose; A high quality of design will be required in all developments, including redevelopments and alterations to existing buildings. Design will be assessed by reference to appearance, neighbourliness, safety, accessibility to all users, and relationship to the built and natural environment. Designs will be expected to follow best modern practice. 'Policy DH2 Tall Buildings Change to DH4: This policy should define what a tall building is, not leave it to supporting text. Then it should be altered so that it actually corresponds to the definition. We propose: 'A tall building is one which is substantially taller than its neighbours, or which significantly changes the skyline, or both. Tall buildings: â€¢ will usually be inappropriate in or adjoining Conservation Areas, the World Heritage Site and Areas of Special Landscape Character. â€¢ will require special justification near to existing residential development may be appropriate in Woolwich Town Centre, Greenwich Peninsula, Charlton Riverside, Tamesis Point in Thamesmead, Thamesmead Town Centre, and the area directly surrounding Abbey Wood train station. Buildings of 10 storeys or more will require special justification everywhere.' Areas of Special Character should be renamed Areas of Special Landscape Character to mark their difference from Conservation Areas. The Management Policies should start with the detail of overall design policy, moved to here from DH1 and altered: We think effective use of land and the mix of uses are not design considerations as such. We also see no place for cultural diversity as a design criterion - the other factors automatically cover for existing cultural variety. We see no reason to refer to policy H5 since it applies anyway We do not think all the criteria apply to all scales of development We cannot see a justification for brown or green roofs everywhere, and we specifically ask that they should not be a requirement in Conservation Areas. We propose: Policy DH (a) Design Considerations 'All development proposals [delete reference to high quality since that is in DH1] will be expected to: i. Provide a positive relationship with the existing urban context by taking account of: topography [delete landscape setting, ridges] and natural features; [delete existing] townscapes, local landmarks, views and skylines; the architecture including scale, height, bulk and massing of surrounding buildings;[and delete sixth point as duplication] the quality and nature of materials, both traditional and modern; adjoining layout and spatial character; architectural, historical and archaeological features and their settings; circulation particularly for pedestrians and cyclists; noise intrusion. ii. Promote local distinctiveness by providing site-specific design solutions; iii. Maintain adequate daylight, sunlight and privacy to adjacent properties; Additionally, developments of more than 5 dwelling units or 5000m2 of floorspace will be expected to i. Have regard to the principles of 'Secured by Design', 'Designing out Crime', and 'Safer Places';[unnecessary words deleted] ii. Achieve accessible and inclusive environments for all, including disabled people; iii. Integrate with existing path and circulation networks and patterns of activity particularly for pedestrians and cyclists; iv. Create attractive, manageable well-functioning spaces within the site; v. Maximise	Reordering the policies is unnecessary. The ordering of policies within a chapter does not indicate the Council's priorities. Each policy is important whether it is first or last in a section. There is now a development management policy in the Core Strategy on Statutory Listed Buildings which includes requirements for alterations to existing buildings. The Tall Buildings Assessment will be published ahead of the submission version of the Core Strategy and analyses the different areas in the Borough and identifies those that may be appropriate for tall buildings, which are included in Policy DH2. Amendments have been made to the support text for this policy to more clearly justify the areas where tall buildings may be appropriate and categorically state that all other parts of the borough are considered inappropriate for tall buildings. Policy DH1 has been retained as a single policy and it was determined that it was not necessary to split the design standards out to cover large scale developments separately. Amendments have been made to the support text of Policy DH1 to more clearly demonstrate that smaller developments can meet the requirements through relatively simple measures and that the Council will assess proposals against this policy mindful of the scale and type of proposed development. The dwelling mix has been removed as a requirement of Policy H5. It is agreed that it is not a housing design issue and mix is sufficiently covered in Policy H2. All other comments are noted but no further changes to the Core Strategy have been made.

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Design and Heritage - Question 12: Design and Heritage (Refer to sections 4.4 and 5.4)**	**Comments / notes**
							energy conservation, through effective layout, orientation, use of appropriate materials, detailing and landscape design; vi. For non-residential buildings, achieve BREEAM rating of 'Outstanding'; vii. [delete Benefit the Borough] Help mitigate and adapt to climate change; viii. Enhance biodiversity consistent with the Greenwich Biodiversity Action Plan; ix. Except where there would be harm to heritage assets, incorporate brown or green roofs to the German FLL standard, or living walls; x. Demonstrate on-site waste management including evidence of waste reduction, use of recycled materials and dedicated recyclable waste storage space; xi. Demonstrate water efficiency and demand management measures; xii. Obtain building materials from sustainable sources; xiii. Demonstrate measures that reduce surface water flood risk.' All following management policies should be renumbered. Policy DH(h) Conservation Areas renumbered DH(i) We find this policy to be disappointingly weak. Other management policies are much more positive - DH(j) protect and enhance; DH(k) safeguarding restoration and enhancement; OS(e) enhance; OS (g) enhanced, enhancement; OS(h) protected and enhanced; Strategic Objective G protect and enhance Greenwich's rich natural and built heritage. And the text of the document is full of the enhancing theme. But when it comes to the Borough's principal heritage assets, the management policy falls back on the minimum requirements of Statute. If the LDF can look for better than basic standards in eg home insulation, then surely it ought to set better than basic standards for its Conservation Areas. We are sure that many people outside Greenwich look with envy on our stock of heritage assets and would be very surprised to learn that the Council so structures its departments that there is no effective championing of the heritage cause. At least the LDF can set a tone, and hopefully structural change can follow in due course. We propose: 'Character and Setting In a Conservation Area all development proposals will be expected i. To have particular regard to â€¢ character as shaped by history, architecture and landscape â€¢ the forms of existing development particularly plot coverage, plot ratios and heights â€¢ the Conservation Area Appraisal, and ii. To follow best current architectural practice to create new development that is worthy of its setting, and, iii. In the case of new buildings or major extensions, to enhance the Conservation Area. Development proposals which fail either to preserve or to enhance the character or the appearance of the part of the Conservation Area where they are situated will not be permitted. Development in the vicinity of a Conservation Area which would have an adverse visual effect on the character or appearance of the Conservation Area, will not be permitted. The Council will seek to enhance its Conservation Areas by carrying out appropriate public realm improvements.' Article 4 Directions We propose: 'The Council will monitor the effect on the character and appearance of Conservation Areas of minor works carried out as permitted development, and where the character or appearance of a Conservation Area is threatened by the impact of such works the Council will introduce Article 4 Directions to control the relevant class of permitted development. 'Demolition of Buildings We propose: Demolition of buildings and structures that positively contribute to the character or appearance of a Conservation Area will not normally be permitted. Conservation Area Consent for the demolition of buildings will [delete normally] be given only when planning permission has been granted for a replacement use or building which enhances the character or appearance of the Conservation Area, or both. When demolition is permitted, it will normally be subject to the building remaining until a binding contract for its immediate replacement is let. SEE ORIGINAL RESPONSE FOR FORMATTING	

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DCS57	Judith	Cooke	Environment Agency				WELCOME Policy DH1 especially parts x, xii, xiv, xvi PROPOSED TEXT 4.4.7 Development will need to be designed to be environmentally sustainable, including managing the impacts of climate change over its lifetime and adapting to these as appropriate. Measures such as appropriate layout and orientation, enhanced biodiversity, water efficiency measures, waste management and the integration of green or brown roofs can all contribute to a building's environmental efficiency. The design of buildings and external areas should take into account the need to raise flood defences and otherwise accommodate increased river levels in the future. 4.4.9 The German FLL standard should be applied for green or brown roofs. The German Landscape Research, Development and Construction Society (FLL) has written the 'Guideline for the Planning, Execution and Upkeep of Green-Roof Sites' which reflects the latest developments in acknowledged state-of-the-art technology. It is a basic tool for the construction of reliable and high quality green roofs and can be applied to Greenwich. Latest developments in the assessment of surface water attenuation provided by green or brown roofs should be applied. Policy DH(j) iv Protect and enhance the river and its foreshore for wildlife and nature conservation, avoid encroachment other than for river dependant use and contribute positively to the improvement of the local environment. We suggest additional items: v Protect the integrity of existing flood defences vi Set back development from the banks of watercourses, flood defences flood defence facilities for operational and maintenance purposes. (Note: for reference of bold see Consolidated Draft Replacement London Plan October 2010 Policy 5.12 Flood Risk Management cited above)	Support for DH1 noted. The German FLL standard has been removed as a requirement for the living roofs and the policy itself has been moved from the Design and Heritage chapter to the Environment and Climate Change chapter. Change to DH(j) iv and v agreed
DCS85	Frank	King					4.4. On the whole I believe that you have got this section right and I concur with most, if not all, of the strategy set-out in this section, but more weight could be given to certain aspects viz: DH I (i): Noise insulation should be a primary consideration, including between t1ats (noise nuisance and good neighbours). DH I (iv): Accessibility for disabled should be an overview consideration for all developments and should include seats in open spaces and pedestrian areas at 22" high for disabled people with back and lower limb problems to sit, as the current height of 17" makes it impossible for them to get-up after sitting unaided. 5% of all such seats and benches would be a fair proportion! DH I (xii): Very important that everything possible is done to encourage waste management and recycling. DHI (xiv): All water saving measures should be mandatory because, in future , water provision will be very limited and costly. DH I (xvi) Surface water management should be a prime consideration from today and forever more. All driveways, gardens and open areas of any sort should be required to be soak-away or permeable and all buildings and structures should have soak away systems so that they do not feed into the sewer systems. In the future all public pathways and roads should be constructed with soak away provisions built into their design. 4.4.4.: Please give this section much more weight and remember that housing is wrong for Greenwich river frontages. 4.4.8.: Think about the effect that houses on the riverfront would have on Water Voles, Black Redstarts and other water dependent creatures!!! DH2 & DH3: I applaud these Policies without reservation. N.B. I know that it is not part of this review, but I would like to express my concern about The Mayor of London taking over Greenwich Park. GBC have protected the Park for many years, and have done a good job (with the exception of allowing it to be used for the Olympic Games). I have real concerns that The Mayor might want to hire it out for all sorts of events in the future. 5.4. 1 to 5.4.29 Are perfectly acceptable and I have no comments to make except to say that I sincerely hope that these planning rules will be enforced. BUT: 5.4.30. to 5.4.32. and Policy PPS5 and Map 2: IT WOULD APPEAR THAT THE 100 YARDS OF THE RIVER BANK THAT I HAVE ADVOCATED BE KEPT FREE OF HOUSING IS OF ARCHAEOLOGICAL INTEREST AND THEREFORE SHOULD NOT BE BUILT ON. AS I HAVE POINTED OUT SEVERAL TIMES, IF HOUSING IS BUILT ON THIS STRIP OF LAND IT WILL BE OUT OF USE FOR OVER 100 YEARS, EVEN FOR ARCHAEOLOGY.	All comments have been noted and the general support of this section is welcomed. Agree that it is certainly important that accessibility for disabled people is taken account of in the design policies of the Core Strategy. Specifics regarding the height of park benches are not within the planning remit. Agree that it is important that the riverfront areas of the Borough are protected. However, the Council feels that the riverfront areas of the Borough provide an opportunity for sustainable development and in fact a number of planning permissions have already been granted for development along the riverfront. Through appropriate conditioning, development can be approved which is sensitive to the natural processes of the river and its long term importance to the borough.

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DCS78		Berkeley Homes	Berkeley Homes (Urban Developments) Ltd	Bob	McCurry	Barton Willmore	Policy DH2: Tall Buildings 4.35 Draft Policy DH2 currently states that 'tall buildings are inappropriate in areas with a visual relationship to Designated Heritage Assets (e.g. Conservation Areas), or areas within or with a visual relationship to Areas of Special Character'. 4.36 We object to this approach and suggest that Policy DH2 acknowledges that that tall buildings maybe appropriate where they enhance the qualities of their immediate and wider environment and applications for tall buildings will be considered on a 'case by case' basis, taking into account issues such as the historic context, protected views and other material considerations. This was an approach which received considerable support at the DRLP Examination in Public (Autumn 2010).	The Tall Buildings Assessment will be published ahead of the submission version of the Core Strategy and analyses the different areas in the Borough and identifies those that may be appropriate for tall buildings, which are included in Policy DH2. Areas not specifically identified in the policy are inappropriate or there are no tall buildings planned for those areas.
DCS52			Greenwich Hospital	Neil	Lucas	Drivers Jonas Deloitte	Greenwich Hospital broadly supports Policy DH1 and the criteria identified, which include the requirement for all developments to be of a high quality design. However, Greenwich Hospital considers that there is a need to retain some flexibility to address individual issues on a site by site basis. The promotion of local distinctiveness through site-specific design solutions is considered by Greenwich Hospital to be essential to the long term sustainable development of Greenwich Town Centre, considering its unique historic setting. Greenwich Hospital broadly supports Policy DH3 and recognises the necessity to preserve and enhance the Maritime Greenwich World Heritage Site and Conservation Areas. Greenwich Hospital notes the policy states that listed buildings and their settings will be protected, although considers that the wording should not be too restrictive as it does not make provision for any alterations to listed buildings. While Greenwich Hospital holds the view that the listed buildings are at the core of the Borough's unique historical value and must be protected from inappropriate development, it considers that in certain exceptional circumstances, alterations to listed buildings will be a necessity to enable the delivery of other Core Strategy objectives. As such, we ask for Greenwich to make the following amendment to the wording of Policy DH3: 'The character and appearance, archaeological, and historical value of the Borough's 20 Conservation Areas will be preserved and enhanced, and the almost 1,000 Listed Buildings and their settings will be protected from inappropriate development.' The additional text accords with Policy H9 of PPS 5 Planning for the Historic Environment.	Comments noted. A policy on statutory listed buildings has been added in to the Design and Heritage section of the document, including reference to development involving alteration to listed buildings. Policy DH3 has been amended to better demonstrate that the Borough has a rich historic environment, both built and historic. It remains a strongly worded policy, describing the requirements for proposals to be accepted.
DCS47			Tesco Stores Ltd		Russell	Nathaniel Lichfield & Partners Ltd	Support is given for tall buildings in Woolwich and Abbey Wood, reflecting increased accessibility via Crossrail. Design policies are considered overtly prescriptive for inclusion within a Core Strategy.	Support for policies on tall buildings is welcomed. It is felt that the design policies are wholly appropriate.
DCS54	Danny	Thorpe	Councillor - Greenwich Council				These are my suggestions/recommendations for the draft LDF on the telecomms equipment section. 1.That the council adopts PPG8 as an essential part of its overall policy on telecommunications equipment 2.Asks operators to provide evidence regarding the need for the proposed development. 3. Asks operators to comprehensively assess the cumulative impact of their equipment, particularly where equipment is being shared on masts. 4. Demonstrate evidence that existing buildings, masts or structures are unacceptable. 5. In areas where mast sharing is in operation, to be satisfied that the health impacts are a material consideration in determining the application. 6. That the Council determines saturation zones in areas where there is a high concentration of masts and refuses to accept any further development in these areas.	Comments are noted. Agreed to revise text to refer to the health implications of communications masts. Reference can no longer be made to PPG8 as it has been replaced by the NPPF as of March 2012 but the wording of this policy is consistent with the NPPF.

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DCS61	Roden	Richardson	The Charlton Society				CHARACTER OF CHARLTON The Charlton Society welcomes the Core Strategy's key commitment to preserving the character of Charlton. We wish to emphasize that this character is crucially defined by the intimate scale and extent of a 'village' community centred on the unique combination of Charlton House, St. Luke's church, The Village, the Charlton Parkland (Charlton Park, Hornfair Park, Maryon Wilson Park and Maryon Park, including the extension to Thames Barrier Gardens) and the Conservation Area. We wish to see the Conservation Area extended to incorporate Heathwood Gardens, Kinveachy Gardens and Woodland Terrace in the east and the terraced streets in the west between Victoria Way and Charlton Church Lane, including the large Victorian mansions in Victoria Way.	Support noted. Charlton Riverside is proposed for a significant amount of development over the core strategy's plan period which is further described in the adopted masterplan for the area. It is agreed that the area around Charlton Village is recognised for its positive contribution to the area and enhanced further in the future.
DCS64			London Fire and Emergency Planning Authority	Donald	Messen ger	Drivers Jonas Deloitte	Policy DH1: Design The LFB do not oppose Policy DH1 which relates to design criteria, but they request the inclusion of further guidelines with regard to fire safety and emergency service access for new development proposals, considering that the documents detailed in part iii) do not make reference to this. The LFB consider that there is scope to include the following requirement within this Policy: 'xviii) Maintain adequate safety in design, such as access, materials and site management strategies.' The LFB seek to ensure the inclusion of hard wired smoke alarms in social housing and sprinkler systems where the risks justify it. Unless opportunities are taken to build safety into new infrastructure, future growth within Greenwich could create additional risks from fire and other emergencies across the Borough.	Noted. An additional reference to safe access for emergency services has been included in the supporting text to policy DH1.
DCS66	Philip	Binns	Blackheath Society				Section 4.4 Design and Heritage Introductory comment The Sustainability Appraisal for Design and Heritage sets out an impressive range of objectives expected of the Draft Core Strategy but we are concerned that the policies may, in part, not be sufficiently robust to control development. We believe that Strategic Policy DH3 relating to Conservation and Heritage, along with Development Management Policy DH(h) relating to Conservation Areas, will be poor substitutes for saved UDP Policies D16 to D22. We urge that reconsideration be given to the omission from the Draft Core Strategy of a specific policy on Listed Buildings. Policy DH1 Design We consider that, within the 27 objectives set out on pages 94 and 95 of the Draft Core Strategy, insufficient emphasis is given to the issue of the trend for paving over front gardens to allow for off-street parking and other uses. Although there is an oblique reference at Policy H5(xiii) on page 67, this issue should be given greater prominence by a reference in Policy DH1 Design and possibly somewhere in the Development Management Policy section relating to Design and Heritage. Policy DH2 Tall Buildings We note that the number of locations where tall buildings may be appropriate has expanded from the relatively limited number of locations identified in saved UDP Policy D28 but, conversely, the range of criteria for assessing the suitability of locations for tall [high] buildings has significantly reduced. Given the adverse impact that tall buildings can have on the existing urban fabric and the fact that there will understandably be a reliance on tall buildings to satisfy the needs of a growing population, we recommend that the criteria in saved UDP Policy D28 be introduced into this section of the Draft Core Strategy. We regret that the 'outstanding architectural or urban design quality' criterion in saved UDP Policy D28 has not found its way into the Draft Core Strategy. We also believe that, in recognition of the existing situation in and adjacent to the Creekside Strategic Development Location [see Paras 3.3.29 to 3.3.33], this location should be added to the list and also introduced at Para 4.4.11. It would be helpful to provide more details of the Council's emerging Tall Buildings Assessment and its relationship to a similar document produced for the Maritime Greenwich World Heritage Site Executive. Policy DH3 Conservation and Heritage We are concerned to	'Important Views and Tall Buildings', an assessment published by the World heritage Site Executive in 2006 was considered when writing the policies and is referenced in relation to DHg Local Views. Policy DH2 has been amended in light of the completed Tall Buildings Assessment. It has been prepared in consultation with English Heritage and identifies areas of the Borough that may be appropriate for tall buildings and those that are inappropriate. A Listed Buildings policy has now been included in the Core Strategy. In light of proposed government changes to existing Planning Policy Statements it was thought to be appropriate not to rely solely on national policy in this instance. The Listed Buildings policies are similar to the existing UDP. Regarding the concern that new technologies such as solar panels would 'disfigure' buildings, the design of all proposed developments including the use of new technologies will be assessed against the design requirements of the document and will need to "positively contribute to the improvement of both the built and natural environments".

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							note that in comparison to the current UDP - saved Policy D16 - the important issue of conservation matters is given so little coverage. We suggest that, at Para 4.4.14, a reference is made to the Council's stock of Locally Listed Buildings, given that in the Development Policy section, they benefit from a policy in their own right - Policy DH(i). Para 4.4.17 refers to Conservation Area Appraisals and Management Strategies. We acknowledge that the preparation of these documents is an on-going task but it would be helpful if the Draft Core Strategy could provide information on the current state of play, in greater detail than outlined in Para 5.4.20 and on similar lines to the coverage given to Article 4 Directions at Para 5.4.22. The Draft Core Strategy should also state that, once approved, all Conservation Area Appraisals and Management Strategies are to be the subject of Supplementary Planning Guidance, in the form of a Supplementary Planning Document, which will control development in conservation areas. No such guidance has been provided to date and it is our concern that a reliance solely on Policies DH1 and DH(h) will not give the Borough's conservation areas the same degree of protection at present afforded by the adopted Unitary Development Plan (2006). Policy DH4 Maritime Greenwich World Heritage Site We welcome the decision to retain a specific policy relating to the World Heritage Site and to reposition it within the Design and Heritage section rather than in the Town Centre section as is the case with the current UDP - saved UDP Policy TC7. We consider that, as the Draft Core Strategy contains references to Circular 07/2009 and the associated English Heritage Guidance Note, mention should also be made to PPS5 which contains a special section on World Heritage Sites. Section 5.4 Design and Heritage Policy DH(a) Residential Extensions It is too prescriptive to state that 'flat roofs will not be accepted on side or rear extensions where they would be visible from the public highway'. The wording in saved UDP D9(iii) - 'in most cases a pitched roof will be required on side or rear extensions where they would be visible from the public highway' - allows for greater flexibility. Policy DH(b) Protection of Amenity for Adjoining Owners We suggest that within this section there is a reference back to Policy H(c) dealing with Backland and Infill Development, since the issues in both policies have much in common. Similarly, we suggest at that at Policy DH(c) there is a reference forward to Policy DH(b). DH(c) Telecommunications Development We note that the wording from saved UDP Policy D11 is repeated here. Policy DH(d) Satellite Antennae We note that the wording from saved UDP Policy D12 is repeated here. We regret that there is no guidance on the installation of equipment aimed at reducing energy consumption, such as solar panels and wind turbines. These new technologies have the potential for disfiguring buildings on which such equipment is installed. This could be even more damaging where different types of equipment are installed in close proximity, to the detriment of the setting and appearance of the conservation area. Please consider the introduction of a policy in this regard. Policy DH(e) Shopfronts and Signs We consider that retention and repair of traditional shopfronts should be given greater prominence by inclusion in the seven criteria listed rather than just a reference at Para 5.4.12. We also consider that that there is a need to strengthen criterion iii. The wording 'using traditional materials as far as possible' leaves the way open for uncharacteristic replica replacements where a truly modern interpretation might be more acceptable. We urge that an Advice Note be prepared on Design Guidance for Shop Signs, Advertisements and Illuminations to accompany the existing Advice Note - Design Guidance for Shopfronts, so that areas outside of Greenwich Town Centre are covered. Policy DH(f) Advertisements We consider that the important element of both internal and external illumination should be added to the list of considerations which should be addressed prior to allowing large posters or other advertisement displays. Policy DH(g) Local Views We appreciate that, in addition to the 11 views listed in saved UDP Policy D27, further amplification is added by reference back to other views set out in the Conservation Area Appraisals. It would be helpful to be more specific in this respect. We question the wisdom of omitting a specific policy for	All other comments have been noted but no additional changes have been made.

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							Strategic Views. We appreciate that Para 5.4.19 makes reference to the (Draft) London Plan and its associated London View Management Framework Supplementary Planning Guidance (2010) by highlighting the protected views to central London from Greenwich Park and Blackheath Point, as well as the protected panorama view from Island Gardens to the Royal Naval College; however, the reliance back to documents from another source makes for an unnecessarily complicated understanding of the Draft Core Strategy. Please reconsider. Policy DH(h) Conservation Areas We are concerned that, other than references to Character and Setting, Article 4 Directions and Demolition of Buildings, this section which sets out planning guidance for the Borough's 22 Conservation Areas is given so little coverage in comparison to the information contained in saved UDP Policies D16 and D17. We sincerely hope that the paucity of material in this section of the Draft Core Strategy and in the that part of the document which relates to the Strategic Policies for Design and Heritage is not an indication that the Council plans to give less priority than at present to this important aspect of the maintenance of the character and appearance of the Borough's rich heritage. Statutory Listed Buildings - for a Borough with in the order of 1,000 Statutory Listed Buildings it is not acceptable to rely on PPS5. It is a guidance document and specifically states that wording in the document should not be duplicated in regional and local planning policy documents. Nor does it contain wording which will protect Statutory Listed Buildings. Unless saved UDP Policies D18 to D22, or some equivalent words, are added to the Draft Core Strategy, it will be very difficult to control development affecting Statutory Listed Buildings. There is a need to include, as in the section on Locally Listed Buildings, a reference to the schedule of Statutory Listed Buildings which is available on the Council's website. Policy DH(i) Locally Listed Buildings We welcome the fact that this aspect of saved UDP Policy D16 is given a Policy in its own right but suggest that the wording 'every effort will be made to ensure their long term retention, maintenance and use' be strengthened so that there is a positive directive on retention, or failing that, retention in part (for example, the incorporation of facades into new development), with demolition only allowed as a last resort. General comments on this section of the document We regret that there is no guidance on Street Furniture. Saved UDP Policy D14 is useful in this respect, particularly its intention to minimise visual clutter and to avoid obstruction for those with impaired mobility. Please reconsider. We also regret that saved UDP Policy D8 on Trees is not included in the Draft Core Strategy. Given the important part trees play in the character and appearance of an area and particularly of Conservation Areas, this is a serious omission. We accept that there is a reference to trees in the Open Space section of the Draft Core Strategy (pages 177 and 178), but we suggest that the Design and Heritage section of the document is the more appropriate location. Please consider introducing saved UDP Policy D8. We question why a map of the Conservation Areas has not been included on similar lines to Map 8 in the saved UDP Policy D16. We also question why, given the importance that Tall Buildings are given in the Strategic Policies section of the document (DH2), there is no Development Management Policy on this issue. Design (and Access) Statements - nowhere can we find a reference to Design and Access Statements. Please consider reintroducing the wording in the adopted UDP Policy D2.	

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DCS81	Linda	Hodgson	Heathway Residents Association				Conservation Areas We believe that Conservation areas need better protection than achieved to date and are concerned that the Core Strategy does not yet do enough to ensure it. There needs to be a sensible differentiation between density in Conservation Areas and that in other areas, such as strategic housing developments We would like to see acknowledgement that lower maximum densities than otherwise specified in the London Plan can be used in locally distinctive areas such as Heathway and Langton Way (as to be specified in their updated Planning Briefs) Policies should ensure better protection of the local scale in Conservation Areas by respecting the local proportions, particularly in relation to locally listed houses of three storeys and higher. We attach by way of context, a statement of the local distinctiveness of Heathway in a separate appendix. Design & Heritage p94 Policy DH1 Design We propose the following important tightening of the 6th bullet point of item i) to better protect the setting of the locally listed Victorian villas in Vanbrugh Park and St John's Park, ensuring that they remain dominant in scale to those built in Heathway, as well as maintaining the sense of open space originally intended between the two (e.g. absolute figures for distance between house frontages and rears should be doubled in the locale of four storey houses) 'The scale height and bulk and massing of adjacent townscape' taking into account relative proportions, as well as absolute figures p96 Support 4.4.8 - reference is made to the Biodiversity Action Plan but this should be expanded to make it very clear that residential gardens remain one of the most important elements of local ecology and hence biodiversity. 5.4 Design and Heritage Policy DH(a) ...Extensions p160 ii - this should be clarified to specify '...visible from the public highway and street frontages' (note that Heathway is not a public highway) p161 Design and Heritage 5.4.1 Policy DH(c) - this policy should be strengthened to also take into account the cumulative effect of telecommunications equipment and a preference for applications that are joined up with others.	Amendments have been made to include reference to Conservation Areas where higher densities are not always appropriate. It is considered inappropriate to amend DH1 to include specific reference to the villas in Vanbrugh Park. It is a strategic policy and the level of detail is more suited to a Conservation Area Management Strategy. Reference to the ecological value of backgardens has been added to the support text of DH1. Policy DHc includes reference to exploring the possibility for sharing facilities. Support text has also been added regarding the health risks of telecommunication masts.

Question 13 – Open Space – Do you have any comments?

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Open Space - Question 13: Open Space (Refer to sections 4.5 and 5.5)**	**Council Response**
DCS7	Sheila	Field					4.5.4 and 4.5.5 The OPEN SPACE STRATEGY being prepared. Can it refer specifically to the half acre field east of Friars Mews, Eltham. The owner, Anglia, is unable to build there due to an adverse Inspector's decision in June 2010. The developer is willing to GIVE THIS FIELD AWAY. It would make 6 allotments. The field is currently inaccessible, and is in an area of open space deficiency.	This site is designated as community open space – refer to the Inset Map for Eltham Town Centre.

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DCS12	Isabel	Assaly	Natural England				Policy OS2 - Metropolitan Open Land We recommend that defined Areas of Deficiency in Access to Natural Greenspace should be an additional criterion to consider with regards to assessing the appropriateness of development and that development should not increase existing levels of deficiency. Policy OS4 - Biodiversity Please note that Sites of Special Scientific Interest (SSSIs) and Sites of Importance for Nature Conservation (SINCs) have different levels of protection in the planning system: SSSIs are Nationally protected, SINCs are locally protected sites and as such, should be referenced under separate bullet points. In addition, actions linked to protecting and enhancing borough biodiversity should also be in line with the London Biodiversity Action Plan. With regards to this policy, the council should consider formally designating sites as SINCs (dependant on their existing biodiversity levels) to increase site protection towards development. Vegetation can also address additional climate change risks, such as hotter, drier summers. For example, evidence suggests that vegetation can reduce the effects of the Urban Heat Island (which is predicted to increase in duration and severity concurrent with increased summer temperatures). We therefore recommend that this is referenced within section 4.5.16 (along with the recognised benefits of vegetation to surface water flood management). Policy OS (a) - Development in Metropolitan Open Land We recommend that a further consideration with regards to development on metropolitan open land should be whether the development will result in the creation of new accessible greenspace. With regards to point ii., we recommend that the sentence be extended to state that: 'or amenity significance of the area results in a net gain for biodiversity and greenspace'. In addition, with regards to point iv., the council should consider the use of permeable pavements in relation to parking provisions. Permeable pavements are a component of Sustainable Urban Drainage Systems (SUDs) and as such, can help to regulate surface water levels and reduce flood risk. Policy OS (g) - Ecological Factors We recommend that the term protected should be used in place of the term respected in point i., development proposals should ensure that biodiversity is protected and enhanced through. Although we are generally supportive of this policy, adverse impacts on species or habitat should be avoided in the first instance. If avoidance is not possible, mitigation should be sought, and as a last resort compensation will be needed - but only if the reasons for permitting development significantly outweigh the harm caused. This is in line with Policy 3D.14 of the London Plan: 'Where development is proposed which would affect a site of importance for nature conservation or important species, the approach should be to seek to avoid adverse impact on the species or nature conservation value of the site, and if that is not possible, to minimise such impact and seek mitigation of any residual impacts. Where, exceptionally, development is to be permitted because the reasons for it are judged to outweigh significant harm to nature conservation, appropriate compensation should be sought.' With regards to existing trees, surveys should be performed to establish their potential to support protected	Policy OS2 – This is not felt to be an appropriate change to this Policy. The purpose of Policy OS2 is to set out appropriate uses in MOL. SSSIs and SINCs have been separated into separate bullet points. Reference to the benefits of vegetation for the urban heat island effect has been added to section 4.5.17. The first change sought to Policy OS(a) is not appropriate. Permeable surfaces are now included in policy DH1. In Policy OS(g) respected rather than protected is more appropriate. Restoration has been added to point v Policy OS(g).

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							species, such as bats and birds. In relation to point ii., we recommend that the sentence be elaborated to state that: 'to enable decisions to be made regarding their conservation with respect to protected species and habitats'. In addition, we recommend that point v. be amended to state: 'The protection, enhancement and restoration of natural river features and corridors by appropriate landscaping and design'.	
DCS13	David	Kerr					Policy 0S(g) Ecological Factors (pages 177/178) It is good to see here material from UDP Policy D3, and also to see at para 5.5.13 supporting material from UDP Policy DB. But it does not seem right that the UDP Policy on Trees has been or appears to have been abandoned. Please reinstate a Council policy on Trees, preferably by using the existing wording of UDP Policy D8. Please note that trees in conservation areas should receive additional protection and that work on trees in conservation areas currently requires planning approval. Please tell me if these principles are to be abandoned. If they are to remain in force please amend this chapter of the draft Core Strategy so that they are included.	The protection of trees is covered by policy OS(g) Ecological Factors. Tree preservation orders are also used to protect trees, but this is a separate process, outside of the remit of the Core Strategy.
DCS14	Terry	Powley	Greenwich Parks Forum				The Forum is particularly interested in the protection of open spaces, and is encouraged by the uncompromising aspirations contained in the report to protect and enhance the Borough's parks and open spaces. Paragraphs 2.1.9, 2.2.1, 3.1.5, 3.2.16, 4.5.2, 4.5.3, 4.5.7 and 4.5.20 all recognise and confirm that the protection of open spaces makes a significant, valuable and indispensable contribution to biodiversity in the Borough and the health of its residents. The Forum therefore sees the draft core strategy as farsighted and protective of parks and open spaces, highly valued assets of the Borough. However, the Forum has to express its concern that the noble aspirations enshrined in the document will not be adhered to in practice. Paragraph 4.5.3 recognises that Greenwich's open spaces are already under threat: "Our open spaces are ... under increasing pressure and must be protected to ensure that residents and visitors continue to benefit from them." Yet the pressure to encroach on Metropolitan Open Land, for example, often comes from the Council itself, as recent decisions on Eltham Common and Woolwich Common demonstrate. It is difficult therefore to place much credence on the draft core strategy's admirable aspirations if those aspirations are constantly undermined by the Council's tendency to place other service expediencies above the protection, improvement and full realisation of its green infrastructure. A commitment to a 'Greener Greenwich' is an estimable ideal, but it must be reflected and supported in practice. The Forum wishes to make the following additional points in response to the draft document: i) the Forum	PPG17 was published in 2002 and was National Planning Policy prepared by Communities and Local Government not the Council. It has now been superseded by the National Planning Policy Framework. The Green Chain Management Plan has not been published

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							recommends that, in a formal mechanism to consider the implications of development pressures on open land, an environmental appraisal is undertaken at the planning application stage (large scale developments are apparently subjected to an environmental impact assessment, and a similar process is urgently needed for smaller scale developments, so that the impact of development on the environment, on climate change and the promotion of health is carefully weighed); ii) the Forum urges that the PPG17, currently under preparation, is completed urgently, in case it has any effect on the draft core strategy; iii) the draft core strategy states that that there is a management plan for the Green Chain Walk. In fact, that remains in draft form and the Forum is not aware that it has been finally approved. Management plans are an important way of planning and reviewing, and the Forum is equally concerned that the Council's draft management plans for individual parks, prepared as long ago as 2008, have not yet seen the light of day; iv) the Council's biodiversity plan was subject to recent consultation and approved in March 2010, so there is little to add to the paragraphs on biodiversity, except to welcome them; v) the Forum has a concern that the draft core strategy makes no provision for funding its aspirations. While many of its features will be funded by external private finance (housing, town development and transport), this does not apply to open spaces. Although the plan provides for the maintenance and enhancement of open spaces, lack of money has sometimes meant that the strategy has not been implemented. Sufficient funds need to be available to support the implementation of the strategy.	
DCS17	Julia	Grollman	Friends of Sutcliffe Park				The Friends of Sutcliffe Park welcome the recording of the Local Nature Reserve status of the central area of Sutcliffe Park as detailed on Map 15. We want the area surrounding this boundary to remain as open green space to give a permanent buffer between the wilder, natural habitat of the LNR and the surrounding urban area, particularly with respect to of the redevelopment of the Ferrier Estate.	The Local Nature Reserve and area around this continue to be designated at Metropolitan Open Land (refer to adopted proposals Map) MOL is protected from development.
DCS21	Carmelle	Bell	Thames Water Plc				Policy OS1 - Open Space Water and sewerage infrastructure, such as treatment works and pumping stations, by their nature are frequently located on the periphery of urban areas or in rural locations away from developed or residential areas and fall within tracts of land identified as Green Belt and Metropolitan Open Land. As mentioned above, a key sustainability objective for the new Local Development Framework will be for new development to be co-ordinated with the infrastructure it demands. It will be inevitable that some of this new utilities infrastructure will need to be located in the Green Belt or MOL where the existing facilities exist and it is considered essential that this is recognised in the Core Strategy and a policy drafted which allows essential utilities development in the Green Belt/MOL.	This is not considered to be an appropriate use for MOL and it is not recommended therefore that the policy be amended. This would not preclude an application for such a use for coming forward for consideration.

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DCS22			Novalong Limited	Richard	Jones	Planning Perspectives LLP	Policy OS1 relating to Open Space is to safeguard, enhance and improve access to the existing public and private open space as defined on the proposals map and other small open spaces. This is a blanket policy that pays no cognisance to the quality of the open space in question. In circumstances where an area of open space delivers no public benefit and is of limited importance, it should not be protected for its own sake. Instead, it should be considered for development, particularly in the context of the housing requirements for London and Greenwich, for residential purposes. Against this background, an extra sentence should be added to Policy OS1 reading: 'However, in certain circumstances, where the public value of the open space is limited, it may be appropriate for the land to be developed for residential or other priority uses'. Policy OS(b) relates specifically to Community Open Space. It should be amended to deal with the point made above with the inclusion of the following words at the beginning of the policy: 'Except where the principle of developing such space for residential or another priority use is appropriate, new' Policy OS(c) covers Public Open Space Deficiency Areas. In some circumstances, new public open space may be delivered in such areas if enabling development is permitted. This potential should be recognised with the addition of an extra sentence to the Policy reading: 'In some instances, this may appropriately be achieved by granting permission for enabling development'. Policy OS(d) relates to Sports Grounds and Playing Fields. It is noted that the policy repeats UDP Policy OS11 and that it will be updated/amended in line with the Council's emerging new Open Space Strategy. However, the support section at Paragraph 5.5.8 notes that local authorities are required to consult Sport England where development proposals may affect a playing field or land used as a playing field in the last five years. This criterion should be incorporated into the Policy and therefore the introductory paragraph should be worded to read: 'The Council will resist granting planning permission for any development which would lead to the loss or would prejudice the use of a playing field or land used as a playing field in the last five years except where' It is also considered that an extra sub paragraph (iii) should be added to Part A of the Policy which allows for playing fields to be redeveloped to accommodate a priority use such as residential. The new Paragraph A (iii) would read: 'iii. The site is required for residential or another priority use; or' To avoid spurious claims that an alternative open space use exists for the land, in Paragraph B (iv) the words 'an identified' should be replaced with 'a proven'. Again to avoid unjustified thresholds for the alternative use of such land, in Paragraph B (vi) the words 'at least an' should be replaced with 'broadly equivalent'	The proposed changes to the Open Space policies are not considered appropriate. Once open space is lost it cannot be recovered.
DCS24	John	Franklin	Greenwich Society				STRATEGIC POLICIES Para 4.5.2: The Greenwich Society notes and approves the results of the last consultation exercise What you told us about open spaces and the key findings of the Sustainability Appraisal. Policy OS1 Open Space and para. 4.5.3: We support these objectives, and endorse the Council's Sustainability Approach. The strategy includes interesting material as to the levels of biodiversity in the various open spaces within	Many of the proposals put forward here are outside the remit of the Core Strategy. Areas of open space do not need to be listed, they are shown on the proposals map.

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							the Borough. DEVELOPMENT MANAGEMENT POLICIES We find that this section is couched in such generalised terms that no worthwhile comments can be made on what is said. We consider that the Core Strategy could usefully make specific proposals, rather than confining itself to aspirations and objectives. The following ideas are proposed which could be implemented without great expense and which could have an immediate impact for visitors and residents alike: 1. A Council official should be appointed for each of the sections into which the Borough is divided. That person would be responsible for open spaces within that area, and would be the contact point for residents or neighbourhood groups which wanted to raise specific concerns. 2. Areas of open space which are not mentioned in the strategy document should be listed. Their maintenance and improvement could have a revitalising effect on the local community. In the area in which the Society has an interest the Burney Street Gardens, the space at the top of Prior Street and at the back of Earlswood Street are examples of the areas which might be so listed. Residents and groups should be invited to nominate areas for inclusion in the list. 3. In relation to such areas the Council should seek to engage with local residents and groups on maintenance, which would not primarily be a Council responsibility, but should rely on self-help, with possibly some financial help for planting, tools etc. 4. Point Hill should be designated within the strategy document. We do not know the acreage, but it is, in any event, an important piece of open land which is in need of sensitive and sustainable improvement. 5. Information panels in graffiti-proof form should be provided at suitable locations in the World Heritage Site. The design, location and materials involved should be discussed with local residents and Societies; the panel at the bottom of Stockwell Street is an example of what might be done. 6. The Council should host one public meeting a year in each of the sections into which the Borough is divided at which the sole issue on the agenda will be open spaces. 7. There should be an Open Space day each summer, possibly linked with an Open Garden day, at which entertainment would be provided and local people would be encouraged to participate. 8. The Council should provide an annual audit as to what has been done in relation to the Open Spaces within the Borough. This should deal specifically with the objectives in Chapter 5.5, so that, for example, the public would know what sports grounds had been sold, and what development there had been in Metropolitan Open Land. 9. No sale of sports grounds should be allowed without wide public consultation, whether or not they are deemed to be surplus to requirements both by the Council and the owners of the site.	Point Hill is already designated as MOL on the Proposals Map.
DCS25		Waite					All the policies are commendable but whether the funding will be available for maintenance, let alone enhancement, is questionable. We need our open spaces more than ever, to provide respite against noise, overcrowding and poor air quality.	Comment noted

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DCS31	Laurie	Baker	London Geodiversity Partnership				The Partnership welcomes your recognition of areas of geological importance and the need to protect them. We welcome the inclusion of Dog Rocks on Plumstead Common as a Regionally Important Geological and Geomorphological Site (RIGS) We suggest that two further sites are worthy of being considered as RIGS in Greenwich. Tripcock Ness foreshore with submerged forest (OSGR 4527 8098) Bleak Hill former sandpit (OSGR 4605 7771) We are willing to progress investigation of these sites and other potential sites for inclusion in this policy. Section 5.5 of Development Management Policies Policy OS (g) sets out Ecological Factors to be taken into account with development proposals. We feel that one way of conserving geodiversity is to state that: Planning permission will be conditioned to conserve and maintain important geological features and, in cases where no permanent features can be retained, temporary geological exposures should be recorded. [This could similarly be applied to biodiversity.]	Tripcock Ness was selected for further investigation in London's Foundations 2009 report (updated March 2012) as a site that should be surveyed and assessed as potential LIG. Bleak Hill Sandpit is recommended in the same report as a LIG. Policy OS(g)i as written requires development proposals to respect geological features.
DCS34	Palvinder	Banwatt	Charlton Central Residents Association				4.0 Environment The strategy recognises the need to protect and enhance the borough's open spaces and to ensure that all residents have access to a variety of good quality public open spaces. Indeed Natural England recommends that no-one should live more than 300m from the nearest green space. Moreover the positive effects of green space on the mental health and physical wellbeing of residents living in deprived areas are well documented. The list of sites of importance for nature conservation is certainly impressive but not necessarily fully comprehensive; for example it does not include the open space opposite the allotments in Highcombe, Charlton. We feel that it is necessary to record all open spaces in the borough in order that they can be monitored, protected and improved. Central Charlton currently has few of the facilities regarded as essential for a healthy community. Serving our area, there is one shop, a primary school and a church hall/ community centre. Apart from the local parks, the small plots of green space in the vicinity are either derelict or have been built upon (e.g. Harvey Gardens). The land in Highcombe, highlighted above, remains derelict and rubbish-strewn, despite having been designated by the council for community use. The proposed rise in rent for allotments to £200 p.a. potentially could lead to further dereliction of open space. Furthermore the local parks, because of the lack of wardens, are perceived by many residents to be unsafe, a situation which will only be exacerbated if the proposed reduction in the number of parks staff goes ahead. Yet the Core Strategy offers no proposals for improving this area; indeed it indicates that the current character of Charlton will be maintained. We are keen to see a proactive approach within the strategy to improve and enhance the environment of densely populated areas such as ours. The large influx of people into the Charlton area is likely to result in increased noise pollution. We recognise that the design and build of the houses will ensure that this has minimal impact on those living within the new developments, however the strategy does not adequately address the impact on established communities. Whilst we share the vision outlined in the Strategy for Greenwich to be a vibrant place to live and work in, there is	The Open Space strategy looks at all types of open space over 0.5ha in area in the Borough. The provision of park staff and wardens is outside the remit of the Core Strategy. The Strategic Flood Risk Assessment has found that the Borough is fully defended from tidal flooding from the River Thames by existing defences of the Thames Barrier and raised defences such as walls and concrete capped embankments.

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							also value in emphasising the need for peace and tranquillity to promote positive mental health and physical wellbeing. We welcome the increased focus on the use of the river as a transport route both for goods and commuters. This will help ease some of the congestion in the borough. However useage should be monitored carefully to ensure there are no adverse effects on the aquatic habitats along and in the river which have taken so long to be re-established. Whilst it is recognised that the Thames Barrier has been an effective flood barrier to date, there have been a number of reports that challenge its ability to provide sufficient protection should extreme weather conditions result from climate change. We feel that the strategy does not fully address the need to strengthen flood defences along the borough's riverfront.	
DCS40	Clare	Kemsley					I live on Greenwich High Road and feel strongly that there should be appropriate detailed long-term plans for the area's development. In particular, we need a supplementary planning document for the immediate area. I make particular reference to the two strategic objectives of the Draft Core Strategy: * 'to protect and enhance Greenwich's rich natural and built heritage' * 'to promote high quality architecture and urban design in all developments in Greenwich'. It's important that Greenwich High Road sees effective implementation of these objectives. A lot of piecemeal development has already happened or been planned, and I don't think that it all meets these criteria. However, we should not assume that it's too late to implement more appropriate planning. Immediate steps should be taken to make sure any further development is planned and controlled with a supplementary planning document or equivalent neighbourhood plan. The architectural character of the area should be improved (or maintained where appropriate), rather than worsened by development. And it must have a positive impact on the experience of current and future residents. I am keen to continue living on Greenwich High Road and I hope that new developments retain what's good about the area, and make real improvements where necessary. However, we can't rely on piecemeal planning to achieve this. I have strong concerns that without appropriate long-term planning, it may deteriorate as a residential area rather than improve. I hope the council is able to ensure that a supplementary planning document is produced for our area.	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

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DCS69	Laurie	Baker	Eltham Society				The Society supports the four Strategic Policies, and that the definitions of the UDP are carried through to the LDF. Maintaining and enhancing the borough's green spaces can assist in reducing the effects of climate change (next section). In paragraph 4.5.4 there is mention of the Open Spaces Strategy and we understand that there will be consultation in the summer. We strongly feel that this must reflect the Biodiversity Action Plan and be adopted before the submission stage of the Core Strategy. Paragraph 4.5.11 mentions the Management Plan for the Green Chain but this has not been revised since the 2003-2008 Plan. The 2009-2014 Plan, as far as we are aware, has never been completed and published. [Note: spelling of Pit is incorrect in paragraph 4.5.19.] Policies OS (a) to (h) are supported but these must be rigorously applied with the pressures for development and increasing population on open land that are ever present. Even the most 'deserving' cases should be resisted. The intense housing and associated development in the north of the borough will not permit sufficient areas for allotments, sport, etc, to serve the increased population. It is important these facilities are provided within the respective developments, and open space elsewhere (private and public) is protected.	The Open Space Study will be published alongside the Core Strategy. Gilbert's Pit spelling has been corrected.
DCS62	M	Everett	Charlton Athletic Football Club	Aaron	Peate	Indigo Planning	The Valley Stadium and its associated car parking are currently designated as 'Community Open Space' on the draft proposals map. We object to this designation and request that it is removed from the adopted proposals map as The Valley is not open space as designated in policies O1 and OS(b) of the draft Core Strategy. The site accommodates a 27,000 seater stadium and is not open in character. The pitch, which is the only green and open element is not accessible to the general public nor does it provide the opportunity to improve the health and well being of residents. It would not have a positive impact on protecting, restoring and enhancing biodiversity (SA Objective 15) or indirectly positively influence ecosystems, soil, water and air quality (SA Objective 16), another attribute that is characteristic of a community open space. Policy OS (b) states that 'in every case they (designated community open space) fulfil specific functions for the local or wider community and constitute welcome open breaks within the built up area, contrasting with the overall built environment'. The site does provide a function for the local community, but not as open space. The Valley Stadium does not provide welcome open break within the built up area as the pitch is enclosed by the stands. For the above reasons, The designation should be removed. As noted, we object to the designation of The Valley as 'community open space'. However, if the Council do not remove this designation, Policy O1 and Policy OSb must be amended to reflect the characteristics of The Valley and the needs of an elite football club and the potential to further improve and enhance The Valley. Similarly, special consideration should be given in Policies O2 and OS(a) in relation to the Metropolitan Open Land designation of the Club's training facilities at Sparrows Lane. The principle of improving the elite sporting and community facilities at Sparrows Lane should be explicitly supported.	It is not considered that the Valley Stadium is incorrectly designated as community open space. The support to Policy OS(b) lists sportsgrounds as one of the types of community open space.

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DCS46	Susan	Proudfoot					4.5 This section is greatly welcomed. But it is a pity that the Open Space Strategy is not ready. It may well have influenced this document. 5.5 Policy OS(c) is greatly welcomed. Policy OS (d) is not strong enough. Suggest the council should REFUSE (rather than resist) planning permission for any development which would lead to loss of or prejudice the use of a playing field or land last used as a playing field. With proposed population growth, effect of Olympics, and efforts to increase participation in sports the borough (and London)will need more not less playing fields in the future. We need to protect them all from development as stated in 5.5.7.	The Open Space Study has been prepared as evidence base for the Core Strategy and has informed the Policies within it. The Open Space Study will be published alongside the Core Strategy.
DCS84	Anna	Townend	Greenwich Environment Forum				See early comments. Fair to propose policies - quite another matter to follow the principles adopted throughout the LBG's implementing structure all with political impartiality.	No action required
DCS45	Peter	Rice					agreed	Support noted
DCS79	Ken	Hobday	Abbey Wood Wildlife Group				The ideas I put before you here are my ideas for what I feel would help make and bring about a more 'Green' and environmentally sustainable Borough; ideas I believe that will seek to improve the quality of life for the residents of the Borough by improving the environment. I believe that improving the environment and quality of life for people within the Borough is the number one issue that The Core Strategy should address. I would like to see The Core Strategy do more to build in a 'Green Infrastructure' into the urban built environment, by for example, stipulating the creation of Green Corridors across the Borough and creating where ever it is possible suitable and appropriate to do so ecologically enhanced green open spaces. Such ideas, I feel, would enhance the quality of peoples' lives and would, I feel, help make and bring about a more environmentally sustainable Borough. We need to 'Green Up' the urban environment in every way we can, by for example reducing the amount of hardsurfacing, creating more green space and creating habitat for wildlife where ever we can do so; creating more tree lined pedestrian areas, giving more space to and planting more native Broad Leaved trees to help increase both the Borough's and London's tree cover and we need to create Green Corridors across the Borough. The Borough should in my view be criss-crossed with Green Corridors. Such Green Corridors would have many benefits: they would act as corridors for wildlife; they would also act as corridors for people and could enable people to travel across the Borough in a safe natural and healthy environment, keeping people away from road traffic for example. Such 'Green Corridors' would have multiply health benefits for people, as well as for wildlife, keeping people away from traffic pollution, noise and keeping people in a more peaceful pleasant Green Environment, rather than a traffic congested polluted noisy stressful environment, all to common in the urban environment. Such corridors would create a more peaceful way for people to travel throughout the Borough encouraging people to cycle and walk, so the health benefits of such Green Corridors would be comprehensive and so by enhancing the natural environment people would benefit too and the Borough would become a more Green and Pleasant place to live and work in. We also need to	Urban Greening is covered in Policy 5.10 of the London Plan and is cross referenced in section 4.6.59 of the Core Strategy.

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							create more ecologically enhanced Green Spaces, both small and large, with Green ecological landscaping and planting schemes in both commercial and residential areas and indeed every planning consent should stipulate that grounds maintenance should be carried out in such a way as to bring about the creation of wildlife habitat where ever it is suitable, possible and appropriate to do so. We should seek to create wildlife habitat where ever it is suitable to do so. For example, mixed species native hedges and wildflower meadows should be created throughout the Borough on the green open spaces on housing estates. Vast areas of Green Open Space exist on Housing Estates throughout the Borough, which could easily be turned into wildlife habitat, such as wildflower meadows, which would do much to help our ever decreasing butterflies and would help enhance our Housing Estates with carpets of wildflower meadows helping to making them more pleasant places to live in. The planting of native shrubs and plants should be carried out, where ever shrub planting is undertaken within the Borough, such as Highway verges and reservations, as native shrubs on the whole provide more habitat for our birds and insects and by carrying out such planting schemes on highway verges and reservations for example, in effect wildlife corridors would be created along roads and highways. Creating such habitat of native mixed species hedges and windflower meadows within our urban landscape would do much to help our now all to decreasing and now often rare wildlife such as garden birds and butterflies and would improve the quality of peoples' lives. All Green Open Space within the Borough, unless there is an obvious and good reason for it not to be so, should be ecologically enhanced and maintained to create habitat for wildlife. How many people living in Greenwich are still able to hear the Dawn Chorus, or are able to see a butterflies in their locality. These are things that in my view are important to the quality of peoples' lives and should be in my view be included in any methods for measuring quality of life.	
DCS60	Lawrence	Smith	Westcombe Society				WS is strongly supports the policy to safeguard, enhance and improve access to existing public open spaces. WS would like to see a policy in this section on the inclusion of green open spaces in all new developments and the development of green open spaces, where ever possible, in existing areas that currently lack open space. Sites awaiting development should also be used as temporary green open spaces. Green open spaces should provide and enhance wildlife habitats wherever possible.	Policy OS(c) has been amended to require large residential developments provide public open space in areas of open space deficiency.
DCS56	Chris	Holland	Blackheath Park Conservation Group				We see that building intensification is focusing on the northern edge of the Borough , but we do not see adequate provision for substantial open space in the north. We think you should plan to reduce the contrast between a green south and an urban north with new MOL in the north. The citation at 4.5 refers to new open spaces integrated with new development, but this is not reflected in the Key Diagram, leading to a conclusion that the 'integrated' spaces are being thought of as small scale. We welcome the retention of MOL but wish to see reinforcement of policy wording to make protection as effective as possible. In our lives, we see the sharp end of planning 'development control' and we know only too well how developers view as a soft target any restraint that is	The Charlton Riverside Masterplan SPD sets aside an area of expanded parkland to be integrated within the new residential led mixed use development which the Council hopes to see in the area. The definition of MOL is explained at paragraph 4.5.9. Community open space is explained at paragraph 4.5.26. Open spaces are important for the Borough's Biodiversity, this has been

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							not absolute. We want to end the practice followed by developers of holding open land out of use in the hope of re-designation for housing. The clearer the strength of policy the more likely it will be possible to achieve this. It is disappointing that the Open Space Strategy has not been produced at this time and we note that the OS sections are therefore subject to alteration whether or not there are any comments. However, we offer comments as things stand at present. We find the document is open to confusion for its varying uses of the term open space. We would like to see definitions of Public Open Space, Private Open Space and Community Open Space, and the consistent use of capital letters so it is clear what is referred to. We would like to know what 'other small open spaces' are. We would like to know what a 'strategic open space' is. Where are Southern Park and Central Park (4.5.6)? We point out that not all open spaces are a recreational resource (4.5.7) - some might be reserved for wildlife. We think aspirational references to the Olympic Games should be replaced by some hard information on legacy, given that the Games will be over by the time this Plan starts. We think that playing fields are of strategic significance and deserve a numbered policy. Following are proposals for changing policy wordings Policy OS1 Open Spaces: 'The Council will safeguard existing public and private open spaces, and will seek to enhance them and improve access to them. The Council will require new open space in new development, particularly in the Opportunity Areas.' Policy OS2 Metropolitan Open Land (MOL): This policy needs to be strengthened to make sure that prospective developers give up their ambitions for building on MOL. This policy does not need to define suitable uses. Its purpose is to signal the inviolability of MOL. Acceptable uses can be referred to in the management policy We propose: 'MOL as defined on the proposals map will be maintained and its open character protected. There is a strong presumption against built development anywhere within MOL. New areas of MOL will be designated in Opportunity Areas' Policy OS(a) Development in Metropolitan Open Land (MOL): This policy is drafted in terms that are too permissive. It needs to be firmer and deal more clearly with use changes as well as building. We propose: 'Changes of use on MOL may be permitted within the following uses provided that public access is not reduced Public and private open space, sports grounds and playing fields; Agriculture and woodlands; Open water features; Golf courses; Allotments; Large grounds attached to educational facilities and institutions; Cemeteries; [crematoria deleted, could perhaps add gardens of remembrance?] Nature conservation. There is a strong presumption against built development including building extensions, hardstanding and lighting. Such development may exceptionally be permitted for a purpose ancillary to the principal use of the MOL, but only provided that the development is independently proven to be essential to the use on the MOL, and the openness of the MOL is preserved, and the design, scale, massing, siting and landscaping has minimal impact on the MOL and any neighbour, and the development is not within a defined site of nature conservation importance and does not harm the ecological	reflected in paragraph 4.5.8.

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							or amenity significance of the area, and the development does not enlarge or create an area of Public Open Space deficiency, and the development does not significantly increase vehicular traffic , and there is no new provision for car parking, and any replacement building does not exceed the ground floor area or height of the building it replaces. Changes of use of ancillary buildings will be permitted only if the new use is independently proven to be essential to the use of the MOL. For development proposals on land fringing, abutting or otherwise having a visual relationship with MOL, special consideration will be given to protecting visual amenity, character and use of the MOL. Possibilities for opening up visual links and green corridors, or creating new access points into or between open land area will be pursued.' The Key Diagram should be amended so that the MOL at Kidbrooke is shown as penetrating the Intensification Area, in the same way as the MOL on the Peninsula is shown. Policy OS(a) Community Open Space: Correct the reference to MOL in second paragraph Policy OS* Playing Fields: None. We propose: 'The Council will safeguard playing fields, requiring that any loss is made good in an equally or more accessible alternative location. Support Active recreation is an important contribution to personal health and social welfare, and the pursuit of active recreation in the open air should continue to be promoted as it has been for many decades past. In an urban area subject to major development pressures, playing fields are all too readily seen as potential development land by their owners whether public or private. In some cases, playing fields are not made available for their intended uses because owners think that absence of use will strengthen the case for permitting housing or other profitable land use. Losing playing fields to built development is an irreversible process and it is strongly in the interests of future generations that playing fields should be kept out of development. This is true even in cases where short-term commercial demand may be low. Policy OS(d) Playing Fields Sportsgrounds and deleted: We consider the wording has ambiguities and needs to be tightened up, and in particular that the provision B iv should not stand alone as a reason for a consent , but should be subsumed within any change of use. B vii is covered in other policies We propose: 'The Council will normally not grant planning permission for any change of use or built development which would lead to the loss of, or would prejudice the use of, a playing field or land last used as a playing field. Exceptionally, permission may be granted if: either i. an independent appraisal of current and future needs for playing fields has demonstrated both that there is a long-term excess of playing field provision in the locality, and that the site has no special significance to the interests of sport, and ii. in the case of any primary or secondary school playing field it would not result in falling below desirable space standards set by the Department for Education and Skills; and iii. in the case of an application for built development, the site is surplus to long-term requirements of all other open space functions; and iv. an alternative site or facility of at least an equivalent quantity and quality is provided in a suitably accessible location or i. the proposed development affects only land incapable of forming a	

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							playing or training area, or ii. the proposed development combines provision for indoor and outdoor sports, providing a facility that is independently rated as achieving sporting excellence such that it justifies the loss of playing fields or an alternative site [delete or facility] of at least an equivalent area and quality is provided in an equally or more accessible location' Of great significance to the totality of open space, but tucked away in the Housing section is this policy: Policy H(c) Backland and Infill Development. This is unchanged from the policy in the UDP, and it is only in the supporting text that reference is made to PPS3 which recently removed private residential gardens (not just back gardens as incorrectly stated in the supporting text) from being classified as brownfield land. Since private residential gardens are probably the major stock of land for potential infill, it seems very clear to us that the radical change in PPS3, intended to prevent garden-grabbing, should lead to a radical change in the UDP policy. Therefore we propose: 'There is a strong presumption against infill residential development on private residential gardens, and especially against backland development behind existing houses. Infill and backland development on land which is not a garden or gardens may be permitted where all the following criteria are fulfilled: i. There is no unreasonable reduction in the amount of amenity space enjoyed by existing residents, especially for those in houses with the shared use of a garden; ii. There is no unreasonable loss of privacy from overlooking adjoining houses and/or their back gardens; iii. There is no unreasonable increase in noise and disturbance from traffic gaining access; iv. There is no significant loss of wildlife habitats, particularly trees or shrubs which would adversely affect the appearance and character of the area; and v. The character of the area is maintained with particular regard to the scale, design and density of the development.' SEE ORIGINAL RESPONSE FOR FORMATTING	
DCS57	Judith	Cooke	Environment Agency				WELCOME Policy OS(h) Green and River Corridors	Support noted
DCS67	A.E.	Hart					4.5.3 A great effort should be made instead to preserve and enhance existing green open spaces and also to create new green open spaces. This would help promote a more healthy lifestyle for the present population and for biodiversity. 4.5.16 The Borough should insist on no more paving of front gardens that increase rainwater run-off and reduce the amount of rainwater reaching the water table. 4.5.4 The Open Space Assessment for Greenwich should have been published two(?) years ago and certainly before this consultation. This is a grave error. 4.1 to 4.4 The Draft Management Plans for P&OS in Greenwich have not yet been implemented despite lengthy delays and I would like to know if there are there going to be sufficient resources to implement them. 4.5.10 There should be no option for the Planning Board (it used to be called the Planning and Environment Board...) to ignore and sidestep the Council's own policies on preserving and protecting public and private green open space, especially COS, playing fields, MOL, Green Chain and Green Belt. For example, MOL has been taken from Eltham Common by the Planning Board at a recent decision, 25 Nov 2010, despite many reasoned, expert	Permeable surfaces are now included in Policy DH1 Hervey Road Playing Field is proposed for educational purposes and a playing field as part of Site Allocation o2. This can be reassessed in the preparation of the Site Specific Allocations Document, to follow in 2013

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							and authoritative arguments and the Council's own policies for development. The DCS must insist on protecting such green open spaces. 4.1 to 4.4, 4.5.5 and 4.5.7 There is no mention in the DCS of protecting Hervey Road Sports Field, SE3 8BU from being built on nor of restoring any of the superb sports facilities that were once there. It is a 130-year old sports field that should be dedicated through Fields in Trust, in this soon to be Royal Borough, as one of the QEII Playing Fields for the Queen's Diamond Jubilee in 2012. This 11.85 acre Field should also be made available for sport for Blackheath Bluecoat and other schools, sports clubs and the local community. As regards open space policies, Hervey Road Sports Field, SE3 8BU should be made accessible to those currently living 'in an area deficient of open space' (4.5.2 and Sustainability Appraisal Objective 10). People of all ages and abilities would gain positive effects on their health (4.7.13, 4.7.17 and SA Objective 1) and there would be a positive impact on addressing climate change (4.6.1, 4.6.2, 4.6.7 and SA Objective 14). There is much evidence of wildlife so the protection and enhancement of this Field would help restore and enhance biodiversity (4.5.15 and SA Objective 15) and also indirectly influence soil, water and air quality (4.5.16, 4.6.22 and SA Objective 16). Events have been held on the Field which provide a sense of place and community for borough residents (4.7.11, 4.7.12 and SA Objective 11). 4.5.3 If there are to be any levels of growth then new green space must be at the very beginning of any planning process. This should be in addition to protecting all existing green open spaces in the Borough or creating alternative green open spaces. 4.5.9 and 4.5.10 No pathways, asphalt, car parks, MUGA or lighting must be allowed even at the edges of MOL. This is in order to preserve and enhance biodiversity which is continuously under threat from both human and natural interventions. 4.5.11 and 4.5.12 The Green Chain should also be enhanced by the means of new 'green corridors' that will link Mottingham, through Eltham, Kidbrooke, Blackheath and Greenwich to Greenwich Peninsular and beyond to the Olympic Park.	

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DCS85	Frank	King					This is a difficult subject to encapsulate cogent comments on as it is very involved and we need to rely on the common sense and goodwill of planners to preserve as much of our open spaces as possible into the future . A lot of pressure will be put on us to give-up our open spaces for building in future years, which we will need to resist with fervour. Need less to say that I would prefer to see all of our Open Spaces and Metropolitan Open Land defined and protected with all of the vehemence which can be mustered to reject any plans "from above" whether this be The Mayor of London or the Government! Any "incidental" structures necessary on open spaces should be carefully managed, such as pathways and "temporary" structures like club houses etc which should be designed and controlled so that they are, in fact, temporary and do not become permanent and spread with ancillary services like car parking etc. Wherever building is permitted for any reason drainage and other conservation should be the prime consideration. One thing that I would like to see developed in our woodlands are Natural Burial sites. Not Cemeteries, but Natural Burials and Woodland Burials. This means that there would be No Headstones, Markings, Paths or Building of any kind on these sites. Where necessary the coffins would be carried to the burial plot, or transported on vehicles not requiring any pathways or roadways of any sort. After each burial has taken place the area would immediately be returned to it's previous surface and after all of the burials have taken place on any given site, it would be returned to the original surface so that there would be no sign of any sort that this was a burial site. Trees and shrubs would be planted where necessary to cover the site. Apart from the many advantages of saving the energy used in cremation and the benefit to the earth and the habitat of the natural matter breaking down and, of course, no maintenance requirements, this would mean that the land could not be used for building in the future whatever the pressure from above. There are hundreds of sites, both in our Woods and in many other Open Spaces within the Borough that would profit from these Natural Burial Sites, and I assure you that there is plenty of demand. N. B. Personally I have had to purchase a Natural Burial Plot in Teynham, near Sittingbourne, Kent, which is the nearest Natural Burial Site to Greenwich. As I have lived in Greenwich most of my life I would have preferred to be buried in the Borough, but, as I firmly believe in recycling, I had no choice but to go further afield to get the Burial that I wanted. In policy OS (a) and 5.5.2. How on earth was planning permission for the massive car park on the other side of the road form QEH, on Common Land justified and as if it's mere presence was not bad enough, QEH have the temerity to charge for parking, which is illegal. This car park should be removed and the land levelled. If it is decided that car parking on this site is essential, then it should be on rough ground (no tarmac) and free to all users. I do not have a problem with the Bus Stand and turning point as this is an amenity which is beneficial to the wider community. Policy OS (g) and 5 .5.12. & 5.5.13: I, and many others, have a feeling for trees. I honestly believe that trees should be protected and never cut down except where essential. In cases where trees have to be cut	No change required

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							down, twice as many in number plus an extra one for every ten years (or part) of the life of each tree must be planted, this means that, if a 99 year old tree is cut down (and this should never happen), then 12 new trees would have to be planted to replace it. There should also be a complete ban on cutting down any tree over 100 years old in any circumstances whatsoever. Please do not say that this would not happen under present rules as a Tree which was over 180 years old was cut down in General Gordon Place where the big Television Screen now stands.	
DCS87			Denistron Land Ltd	Andrew	Gale	Drivers Jonas Deloitte	Policy OS1 -Open Space Densitron welcome the protection of open spaces and MOL through the inclusion of Policy OS1. However it is felt that an element of flexibility should be incorporated into the policy where appropriate so as not to limit sites that may fall within the circumstances discussed above, outside of any policy document review process, where these might offer benefits through sensitive development. The following amendments to the current draft Policy OS1 are suggested: "To safeguard, enhance and improve access to existing public and private open space, including Metropolitan Open Land, Green Belt, Green Chain, Community Open Space, as defined on the proposals map, and other small open spaces, except where 'very special circumstances' can be demonstrated to warrant departure from this. " Policy OS2 -Metropolitan Open Land Prior to the undertaking of an Open Space Assessment we would contend that confirming the extent of area to which this policy can be applied is both premature and 'unsound'. It is accepted that once boundaries have been confirmed, a policy is required to protect the land of value. In this regard , it is noted that the supporting text to Policy OS2 refers to Policy 7.17 of the Draft Replacement London Plan, addressing MOL, in that it states that inappropriate development should be refused except in very special circumstances. The supporting text then goes on to highlight that MOL is protected in line with the Draft Replacement London Plan, but does not specifically mention the exception of very special circumstances. Densitron request that the exception of very special circumstances to inappropriate development within MOL be included within the policy text of Policy OS2 to run fully in line with Policy 7.17 of the Draft Replacement London Plan. This is also to allow greater flexibility if the circumstance were to arise as described above	The Policies are intentionally strong in order to protect our important open spaces, and reflect national and regional planning guidance.

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							under Proposals Map -MOL Boundary. It is also noted that the supporting text of Policy OS2 refers to Policy E2 for uses that the Council will accept as appropriate for MOL. Policy E2 appears to deal with flooding and it is perhaps the series of policies, OS(a) to OS(i) which the Council is referring to. Densitron requests that this is clarified within the supporting text.	
DCS80	Janet	Goulton	London City Airport Limited				17. While LCA supports the development of biodiversity and indeed has its own Biodiversity Strategy, we urge the Council to consider flight safety and consult with the Airport Safeguarding Consultee when considering development of wetlands or other habitats in the Thamesmead area that may attract birds (Policy OS4).	Noted
DCS66	Philip	Binns	Blackheath Society				Section 4.5 Open Space Introductory comment This section of the Draft Core Strategy, while understandably strategic in nature, sets out policies which are high in aspiration but there is very little detail about implementation. We trust that the Council's emerging Open Space Strategy document will address this issue. The Draft Core Strategy states that the quality of the Borough's open spaces should be improved but there is little detail on how this is to be achieved. Although Policy OS3 concentrates on the South East London Green Chain, we believe that insufficient emphasis has been given to the desirability of connecting places with green corridors for wildlife and green networks for people. These would help to link existing open spaces and create new ones where there is an absence. Policy OS1 Open Space We support this policy of safeguarding, enhancing and improving access to public and private open space and it is right to identify the threat that increasing development will bring. The reference to Central Park and Southern Park on the Greenwich Peninsula being strategic open spaces is noted and we urge that consideration be given to identifying other open spaces within the Borough as having strategic importance. We note that improved access to public open space is a policy objective but more clarity is required. The Draft Core Strategy has little to say about safety and security within the Borough's open spaces. We consider that this important issue be given more attention, as a matter of urgency. Policy OS2 Metropolitan Open Land We consider that some of the Areas of Metropolitan Open Land in the Borough are of a very low quality and more must be made of them, particularly in terms of improving accessibility. Policy OS3 South East London Green Chain As rightly identified in the Draft Core Strategy, this network is an exceptional feature and we support any policy which promotes the Green Chain Walk and enhances it as a part of the Capital Ring, a feature of the Draft London Plan. Policy OS4 Biodiversity We support the intentions of the Council's Biodiversity Action Plan (2010) at securing the conservation, enhancement and public appreciation of this important issue. Biodiversity within the Borough must be preserved and enhanced at all levels. This policy should encourage the creation of green corridors, the protection of garden spaces (particularly front gardens which are often paved over for parking), the protection and creation of ponds and other bodies of water	Policy OS(h) addresses green and river corridors other than the South East London Green Chain. Safety of public spaces (including open spaces) is covered in Policy CH1 Cohesive Communities. The Green Flag scheme will be covered in the Draft Open Space Strategy. It is considered that trees are adequately addressed in Policy OS(g) of the Core Strategy. Areas of Wildlife and Public Open Space Deficiency are now mapped in the Core Strategy.

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							and ensure that all future development should create biodiversity through the inclusion of features such as green/brown roofs. Other comments There is no mention of the Green Flag scheme within the Draft Core Strategy. This is a serious omission as one of the benefits of Green Flag status is that it ensures the enhancement of selected open space. The goal should be to attain Green Flag status for far more open space within the Borough. The Westcombe Woodlands - we note that Table 4.4, which contains a schedule of 'Sites of Importance for Nature Conservation - Sites of Local Importance' identifies, at page 113, The Westcombe Woodlands, describing it as 'Small secondary woodland with dense shrub layer'. This is followed by a statement to the effect that a future strategy for this open space and its management is under review. We consider that greater clarity is required in this respect. Section 5.5 Open Space Policy OS(a) Development in Metropolitan Open Land This policy seems reasonable in terms of intent and aspiration but looks open to abuse in practice. The underutilisation and poor management of these spaces leaves MOL open to development creep. The policy should ensure that any such development must enhance the MOL in all regards - access, security and biodiversity. Policy OS(b) Community Open Space While not benefiting from the same degree of protection as MOL, we consider that similar issues apply here - underutilisation and poor management. This policy should also ensure that any development on or adjacent to Community Open Space should enhance the space. Funding should be made available in this regard. Policy OS(c) Public Open Space Deficiency Areas We consider that this policy should promote a Borough-wide initiative to create a green network with existing open spaces being connected through the creation of new spaces in areas of deficiency and that funding should be allocated for this. Will the Draft Core Strategy contain a map of Public Open Space Deficiency Areas similar to Map 5 - page 78 of the adopted UDP? Policy OS(d) Sportsgrounds and Playing Fields We believe that there should be more realism and honesty about the usage and management of such open spaces. Perhaps these spaces could be put to better use with the intention of increasing biodiversity such as that achieved at Sutcliffe Park. Policy OS(e) Park Facilities We note the aspirations of this Policy but we are concerned that, with competing claims on funding for the enhancement of other open spaces, improvements to the Borough's parks will not be given the priority they deserve. Policy OS(f) Wildlife Deficiency Areas We welcome the aspirations of this Policy but question how the objective of increasing the ecological interest of areas of the Borough which are currently deficient in wildlife sites can realistically be achieved. The policy also needs, in our opinion, to be more focussed - what species, what goals and in what areas? We also question how the policy links in with the existing Biodiversity Action Plan (2010)? Will the Draft Core Strategy contain a map of Areas Lacking Accessible Wildlife Areas similar to Map 6 - page 86 of the adopted UDP? Policy OS(g) Ecological Factors We welcome the fact that, in this Policy, the Draft Core Strategy acknowledges that increased development is a genuine threat to the ecology, with trees in particular being at risk. The	

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							loss of every tree results in a serious reduction in habitat. It is essential that all new development improves on any existing ecology on the site in question. We consider that there should be a specific policy on Trees either here or in the Design and Heritage section of the Draft Core Strategy. Policy OS(h) Green and River Corridors We believe that more creative thinking is needed in this regard. Such corridors should be considered in conjunction with access and the creation of new open space. For example, there should be a better correlation between cycle routes and green corridors. Although acknowledging that great strides have been taken in making the River Thames more accessible, we consider that more remains more to be done in this respect. We also believe that it would be beneficial to bring rivers and streams at present in culverts back to the surface, as at Sutcliffe Park.	
DCS81	Linda	Hodgson	Heathway Residents Association				Biodiversity and Residential Gardens Much reference is rightly made to the need for maintaining the borough's biodiversity, which is supported by the creation of a Biodiversity Action Plan. Whereas HR&NWA are very supportive of this, we feel that the emphasis on 57 specific sites risks losing sight of 'the wood for the trees'. A critical omission throughout the Core Strategy is the relative significance of residential gardens. These collectively form a very large proportion of the green space in the borough. It is these gardens which support the most important aspect of local biodiversity, the 'bottom of the food chain', which is what actually sustains all the species people tend to notice. This very important point should be specifically recognised within the document. The biggest cumulative effect on the local ecology and biodiversity is therefore likely to be from residential planning applications and development. It is essential to prioritise and retain as much green space, vegetation and soil as possible in residential gardens. Policies should be developed further in order to control this. The document also rightly highlights the importance of trees to the local environment. We very much support this but believe that shrubbery is just as important as trees. Without extending the document and policies to incorporate shrubbery, the spirit of their intentions will not be achieved. We support the active encouragement of green roofs and living walls in new developments, as well as sylvan areas such as Heathway and Langton Way Biodiversity p105 Policy OS4 Biodiversity - We urge the inclusion of a statement in this policy, which promotes the protection of residential gardens and their combined contribution to the local ecology. 'The ecology of residential gardens (by seeking as much as possible a neutral net effect on combined greenscape and flora as a result of residential development - Include specific mention of and recognition of need to protect the Heath (as a distinctive, urban green space)! - p107 Table 4.1 Sites of Importance for Nature Conservation - We believe that a glaring omission to this list is the East Greenwich Pleasaunce, which we trust will be added Policy OS(g) Ecological Factors - this important policy should be enhanced to better protect the green space, flora	Gardens are identified as one of the Borough's Priority habitats in the Greenwich Biodiversity Action Plan. The importance of gardens for the Borough's Biodiversity has been added to the Core Strategy – paragraph 4.5.20. SINCs are not designated by the Council. East Greenwich Pleasance is not currently a SINC but its ecological value can be assessed in the next GLA review. It is not appropriate to include shrubbery alongside trees in this instance.

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							and fauna provided by existing residential gardens p178 We support the protection of trees and believe that this should be extended to ensure the same safeguarding of shrubbery. The affect of development on mature shrubbery, as well as trees, should be neutral. Hence amending items iii to iv, as well as 5.5.13 to say '...trees and shrubs'	
DCS83			UK Power Network	Sacha	Winfield-ferreira	BNP Paribas Real Estate	4.5 Open Space UKPN notes the responses to the previous round of consultation on the Issues and Options document which identified that: Open spaces should be protected; It is very important to improve the quality of open spaces; It is very important to improve safety and security in open spaces; and It is important to improve public access to open spaces, leisure and sporting facilities. We appreciate and support the Council's view in paragraph 4.5.2. that 'the Borough's green infrastructure is a major resource that needs to be protected, improved and made fuller use of to ensure that its full potential is realised1. Future development growth should result in new and enhanced provision of publicly accessible open space and recreation facilities' Policy OS1 Open Space We support the principle of Policy OS1 Open Space, which seeks to safeguard, enhance and improve access to existing public and private open space. This policy acknowledges the importance of maintaining open space, however, also identifies that it is not enough to just protect it, the Council should also seek to enhance and improve access to open spaces. Notwithstanding this support, the policy does not make reference to instances where exceptional circumstances may exist or be required for example to safeguard the longer term use/protection of open space and playing fields. For example where a sports field is surplus to requirements of a business or club and there is no market for such sites. As such they are likely to suffer from lack of investment leading to sites and facilities becoming dilapidated. We consider this to be an important issue as an 'enabling development' proposal may ensure that, in exceptional circumstances, sites are able to be maintained in a recreational/sporting/open space use. As such, we request that the policy's wording is amended as follows: Other than in exceptional circumstances, to safeguard, enhance and improve access to existing public and private open space, including Metropolitan Open Land, Green Belt, Green Chain, Community Open Space, as defined on the proposals map, and other small open spaces. Policy OS2 Metropolitan Open land Open spaces and in particular sporting facilities have ongoing maintenance and management costs related to them. In instances where such a facility is due to be disposed of and it can be demonstrated that there is no demand in the market for the site in its current form, the only feasible way of securing future ongoing investment into the facility may be though the partial development of the site, which would generate the funds to cover the ongoing costs of maintaining the open space and/or the on-site facilities. Given the above, we object to policy OS2 in its current form. Given the objectives identified as being important with regards to open space set out in policy OS1, we request that that Policy OS2 identifies that there may be instances where exceptional circumstances exist for the use or partial	Support noted Policy OS(c) seeks to improve public access to open space. Reference to enabling development on protected open space sites is not considered to be appropriate.

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							development/redevelopment of open land and buildings, outside of those specified in the policy, which would achieve the open space objectives. These being to: Secure the future protection of the major part of the open land from built development and have minimal impact on the open nature of the area; Improve the quality and usability of recreational/sporting facilities in the area; Improve public access to recreational/sporting facilities in the area; Conserve and enhance the ecological or amenity significance of the area; and Enhance the landscape and visual amenity of the area. Development Management Policies 5.5 Open Space Policy OS(a) Development in Metropolitan Open Land We object to Policy OS(a) as we consider that the Council's policies should build in flexibility to secure the ongoing use of sites by identifying that in exceptional circumstances an 'enabling development' or similar argument should be taken into consideration. In light of the above, we request that Policy OS(a) is amended to explicitly include the following: 'Where it can be demonstrated that no demand exists for the land and facilities, or there is an excess of supply; and that keeping land in open space/sports use is not financially viable, the change of use or redevelopment of existing buildings, areas of hard standing and part of open land for uses not identified in Policy OS2 may be considered where it secures the ongoing objectives and use of the larger part of the site for open space/recreation/sporting uses through a legal agreement' Policy OS(d) Sportsgrounds and Playing Fields We support the flexibility provided by section A of Policy OS(d) Sportsgrounds and Playing Fields, which identifies that the Council will resist the loss of playing fields land except where: An appraisal of current and future needs for playing fields has demonstrated that there is an excess of playing field provision; The site has no special significance to the interests of sport or for school playing field(s); and The site is surplus to requirements of all other open space functions. We object to part B of Policy OS(d) however, as it does not take into consideration that in some circumstances, where there is no demonstrable demand for such facilities, the rationalisation of such land will be needed to enable investment into retaining the continued use of the larger part of the facility. It should be noted that such rationalisation may result in the ability to provide enhanced facilities i.e. all weather pitches, which would be more versatile and preferable to the existing facilities. Given the above, we request that the Council detail within point iii. that rationalisation of facilities may be considered in situations where this would result in provision of enhanced facilities.	
DCS90	Mrs	Abraham	Mansoor				No more public spaces for this borough. If there is. Where?	No action required

Question 14 – Environment and Climate Change – Do you have any comments?

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Environment - Question 14: Environment and Climate Change (Refer to sections 4.6 and 5.6)**	**Council Response**

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Environment - Question 14: Environment and Climate Change (Refer to sections 4.6 and 5.6)**	**Council Response**
DCS11			WM Morrison Supermarkets Plc			Peacock and Smith Limited	The wording of emerging Policy E1: Carbon Emissions fails to comply with government policy direction contained in Planning Policy Statement 22: Renewable Energy (PPS22). Paragraph 8 of PPS22 states that local planning authorities may include policies in local development documents that require a percentage of energy requirement to come from on-site renewable energy generaton, however it must be noted that this guidance is subject to the caveat that such policies: i. should ensure that a requirement to generate on-site renewable energy is only applied to development where the installation of renewable energy generation is vaible given the type of development proposed, its location and design. ii. should not be framed in a way as to place an undue burden on developers, for example by specifying that all energy to be used in a development should come from on-site renewable energy generation. In accordance with PPS22, our client respectfully requests that emerging Policy EC1 confirms that the percentage requirement will be subject to the tests of viability and suitability.	Policy E1 has been reworded to be better reflect the energy hierarchy contained in the London Plan.
DCS12	Isabel	Assaly	Natural England				Section 4.6 - Environment and Climate Change Policies in this section concern carbon reduction and reducing the risk of flooding. However, policies within this section have the potential to be expanded to address additional climate change risks, such as hotter, drier summers (for example, the Urban Heat Island Effect). We therefore recommend that this policy be expanded to address further climate change issues (in addition to flooding) and that climate change mitigation and adaption proposals are clearly linked into Green Infrastructure (GI). We also recommend that a GI policy be developed and linked to other Core Strategy policies, such as OS4 (biodiversity) and DH1 (design). Policy E1 - Carbon Emissions An addition criterion for point i. should reference the need for sustainable design within development to ensure the reduction of carbon emissions. Sustainable design can be linked to GI (e.g. the use of green roofs - which can reduce carbon emissions by lowering the need for mechanical heating/cooling). The development of a GI policy within this document (as previously recommended) would provide additional support to the application of GI within development which would in turn contribute to a reduction in carbon emissions.	Green Infrastructure is encouraged in the Greener Greenwich SPD Policy E1 has been reworded to better reflect the energy hierarchy contained in the London Plan.
DCS18	Irene	Godfrey	Greenwich Wildlife Advisory Group				Strengthen policies on green/living roofs.	Policy EA(e) on living roofs has been added to the Core Strategy
DCS21	Carmelle	Bell	Thames Water Plc				Section 4.6 - Climate Change Climate Change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water supports water conservation and the efficient use of water. All new dwellings should meet the water usage targets set out in code for sustainable homes code 3 rating as a minimum. Policy E2 - Flood Risk Thames Water generally support the policy in relation to applying the sequential approach, particularly in relation to the disposal of surface water as set out in the London Plan, but consider that the Policy could be improved in relation to flooding from sewers as pluvial flooding is particularly significant in urban areas. PPS25: Development and Flood Risk states at paragraph 14 that a sequential approach should be used by local planning authorities in areas to be at risk from forms of flooding other than from river and sea. Annex C lists the forms of flooding and now includes: "Flooding from Sewers". Policy CP4 should therefore include reference to sewer flooding and an acceptance that flooding could occur away from the flood plain as a result of development where off site infrastructure is not in place ahead of development. It is vital that	Within the support text of policy IM1, we will encourage developers to provide infrastructure prior to the completion of development. Further detail of water and sewerage infrastructure requirements in the Borough will be included in the Infrastructure Delivery Plan

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							sewerage/waste water treatment infrastructure is in place ahead of development if sewer flooding issues are to be avoided. It is also important not to under estimate the time required to deliver necessary infrastructure, for example: - local network upgrades take around 18 months - sewage treatment works upgrades can take 3-5 years This therefore increases the importance for Thames Water's proposed changes to Policy C1 regarding sewerage/waste water infrastructure to be taken into account. Thames Water support the use of sustainable drainage systems in appropriate circumstances. However, it should also be recognised that sustainable drainage systems are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. A well maintained and managed sustainable drainage system is also required to prevent it becoming ineffective, potentially increasing overland flows, and consequently having an impact on the sewerage network.	
DCS24	John	Franklin	Greenwich Society				STRATEGIC POLICIES The Greenwich Society considers that the passages dealing with Environment and Climate Change are well reasoned, and the objectives are clearly stated. Three comments: 1. The emphasis on public transport and walking/cycling is to be commended, but the Council could be more pro-active in terms of encouraging cycle use by designating (perhaps in association with Sustrans) cycle tracks or paths within the Borough. Also they should recommend walking routes to and from public transport hubs. The kind of signage from Greenwich Railway Station to the centres of the World Heritage Site, with estimates of the time likely to be taken in walking there, are helpful and should be rolled out on a wider basis throughout the Borough. Walking maps could be provided to residents, indicating the public footpaths in their area, and recommending routes from point A to point B. 2. An annual award should be made within the Borough to the new developer (whatever the size of the development), which has incorporated the best and most efficient features to deal with carbon emissions and likely climate change. 3. There should be a clear commitment to the present levels of street clearance, refuse collection and re-cycling. These are widely appreciated. DEVELOPMENT MANAGEMENT POLICIES We have the following comments: 1. The emphasis on public transport and walking/cycling is to be commended, but the Council could be more pro-active in terms of encouraging cycle use by designating, (perhaps in association with Sustrans), cycle tracks or paths within the Borough. Also they should recommend walking routes to and from public transport hubs. The kind of signage from Greenwich Railway Station to the centres of the World Heritage Site, with estimates of the time likely to be taken in walking there, are helpful and should be rolled out on a wider basis throughout the Borough. Walking maps could be provided to residents, indicating the public footpaths in their area, and recommending routes from point A to point B. 2. An annual award should be made within the Borough to the new developer, (whatever the size of the development) which has incorporated the best and most efficient features to deal with carbon emissions and likely climate change. 3. There should be a clear commitment to the present levels of street clearance, refuse collection and re-cycling. These are widely appreciated.	Signage, awards and street cleaning are outside of the remit of the Core Strategy

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DCS25		Waite					The policies show high aspirations, but it is unclear whether certain technologies will be available/ affordable. Also, it is unclear at this stage, how resources will be made available to protect existing residents from noise and air pollution (5.62, 5.6.3).	Policies E(a) and E(c) protect existing residents from noise and air pollution.
DCS29		Mayor of London	Greater London Authority				E1 The Policy is on the whole in general conformity with London Plan policies but there are some changes which could strengthen the Policy and these are set out below. The Core strategy should require that all developments prepare a detailed energy strategy to demonstrate how they will meet minimum targets for carbon dioxide emissions reductions. More emphasis should be put on energy efficiency which is at the top of the London Plan energy hierarchy. Developments should maximise savings through energy efficiency measures prior to considering combined heat and power (CHP) and renewables. A policy on sustainable design and construction should also be included. The Core Strategy should reflect the London Plan targets for carbon dioxide reductions in LINE with Policy 5.2 of the Draft Replacement London Plan (related to Part L 2010 Building Regulations targets). The draft replacement London Plan does not retain a policy target for 20% renewable energy in favour of the approach to have targets for overall carbon dioxide savings. Given that the EiP panel report is expected imminently the Council should move towards this approach to simplify the approach to energy savings. Point ii and iii should be reworded to prioritise the following hierarchy in Line with Policy 5.6 of the DRLP i.e. A) Connection to existing district heating or cooling networks or B) where these are not available, prioritise sitewide CHP networks to be adopted where feasbile and/or C) make provision to allow connection to new district heating networks in the future. Development Management Policies The development management policies make reference to the relevant draft replacement London Plan policies and their inclusion is supported.	Policy E1 now requires that major development proposals include an energy assessment in accordance with London Plan Policy 5.2 Policy E1 now reflects the London Plan energy hierarchy and refers to reducing energy use through design. It is agreed to delete the policy target of 20% of energy use from on-site renewable sources.
DCS42			Greenwich Peninsula Regeneration Ltd	James	Wickham	Gerald Eve	E1 We are concerned that the strategic objective of this policy is unclear as currently phrased and we object to its current wording. The Draft Replacement London Plan, as well as the thrust of national policy, is clear that the overriding national priority is to reduce carbon emissions. This is set out in Policy 5.1 of the DRLP and is reflected in the Mayor's Energy Hierarchy (Policy 5.2, DRLP). Using renewable energy is positioned below reducing energy use and supplying it efficiently in this hierarchy. We do not consider that Policy E1 is in general conformity with this approach as it requires carbon reductions to be realised through the use of renewable energy in the first instance. Renewable technologies are not always the best measures for securing a reduction in carbon emission and prioritising their use can mean that opportunities to reduce energy use in the first instance are neglected. There is also the potential for conflict between the Mayor's strategic carbon reduction policies set out in DRLP Policy 5.2(B) and the 20% carbon reductions through renewables required by Policy E1, insofar that to meet the Mayor's strategic targets it may not be possible to include a 20% renewable element (for example through the use of CCHP which is highly efficient and low carbon but not renewable). There is therefore a risk that overall carbon reductions are sacrificed to achieve a lower level of reductions based on renewable energy.	Policy E1 has been amended to better reflect the energy hierarchy set out in the London Plan 2011 and the aim to reduce carbon emissions.

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DCS69	Laurie	Baker	Eltham Society				The Society supports Strategic Policies E1 and E2. We feel that the increase in hard surfacing should be kept to a minimum, especially if it is converting gardens or other soft surfaces, to allow rainwater to soak away and help reduce flooding.	Permeable surfaces are now included in policy DH1
DCS84	Anna	Townend	Greenwich Environment Forum				Inevitably the area we have been most involved in across policy is forward planning and future 'envisioning' In brief, we believe the Borough long ago reached its maximum carrying capacity. It now has to think and plan 'historically' to retain the inheritance it has lost, and restore lost environments, protecting and creating the new ones sustainably.	The London Plan sets targets for new housing within the Borough. The Core Strategy aims to deliver this growth whilst protecting important green and built heritage.
DCS45	Peter	Rice					Agreed	Support noted
DCS79	Ken	Hobday	Abbey Wood Wildlife Group				We need to recognise and address the issue of light pollution, which is in my view an all too often environmental pollution all too ready dismissed. Light pollution is both bad for people and wildlife. An example of bad light pollution impacting on wildlife and the natural environment can be seen on Bostall Heath in Abbey Wood, where the drive to The Greenwich and Bexley Hospice, which is set in Bostall Woods, is over lit with bright street light type lighting which glares into the surrounding woodland. This is a good example of light pollution and shows how bad lighting impacts into the natural environment.	Light pollution is covered in Policy E(a) Pollution
DCS71		Tilfen	Tilfen Land Ltd	Craig	Blatchford	Blue Sky Planning	Policy E1 relates to carbon emissions. It seeks for all new development to reduce carbon emissions by at least 20% through the use of renewable energy generation. The Policy is not clear about the base that will be adopted against which the 20% reduction will be sought. Furthermore, the There is cross reference to the Council's Draft Climate Change Strategy which is not yet publically available. We note that the Council's priority is to move to decentralised low carbon energy systems such as local heat and power networks using CHP. However, Tilfen Land considers that the emphasis on CHP and/or connection to a network for immediate or future use does not set the appropriate context for the consideration of the full range of low carbon energy options. We would suggest that Policy E1 is revised to reflect the GLA approach with the overall aim of achieving a 20% reduction in carbon emission by a range of different measures, not solely CHP or renewable energy generation in general. This could include energy efficiency measures, decentralised heating, power and energy, etc in addition to or as an alternative to renewable energy generation. It is Tilfen Land's view that focusing on Combined Heat/Power systems and renewable energy only to meet a 20% reduction in carbon dioxide emissions is overly prescriptive.	Policy E1 has been amended to better reflect the energy hierarchy set out in the London Plan 2011 and the aim to reduce carbon emissions.

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DCS60	Lawrence	Smith	Westcombe Society				Policy E1 Developments should use durable/resilient/sustainable materials. There should be an immediate requirement, i.e. as from adoption of plan, for new developments to be carbon friendly by incorporating renewable energy features. The onus should be on the developer to justify why they cannot be incorporated if they are to be omitted. Buildings should be adaptable so that there is potential for change of use in the future without demolition. Hard standing should be porous (SUDS sustainable urban drainage system for all new developments). Policy E(c) Air Pollution WS would like to see more on pollution. There needs to be a discussion of causes of pollution. The principle source of air pollution is traffic. There is a need for an overall reduction in traffic as the most effective means of reducing pollutions. Development on Charlton riverside should not go ahead with insufficient infrastructure. New developments should discourage private ownership of cars and encourage car clubs. (See also WS answers to questions 4, 6, 12 DH1)	Reducing pollution from transport is covered in Policy E(c) Air Pollution. The link between transport and pollution is also referred to in paragraph 4.6.14
DCS57	Judith	Cooke	Environment Agency				FROM INTRODUCTION We are particularly supportive of the policies which relate to the following: Flood risk and sustainable drainage Climate change adaptation Biodiversity Land contamination Water quality Groundwater protection and pollution prevention Energy and water efficiency and conservation We anticipate that flood risk will be taken into account at all stages in the planning process to avoid inappropriate development in areas at current or future risk from flooding, and to direct development away from areas of highest risk in accordance with the sequential test. Development should not worsen flood risk elsewhere. We would stress the importance of a Strategic Flood Risk Assessment (SFRA) for the Borough in informing the policies of the Greenwich Core Strategy. We have worked with you and your consultants on this and look forward to the opportunity to review the final version of your Level 2 SFRA as soon as this is available. This will be required if, following the sequential test, sites within areas at risk of flooding need to be considered for development. This should assess the levels of risk and the requirements for flood risk infrastructure and mitigation measures needed for potential sites within Flood Zones 2 and 3 (as defined by Planning Policy Statement 25: Development and Flood Risk (PPS 25). We recommend that more emphasis within the Core Strategy be placed on the issue of water quality, in particular, waste water treatment and groundwater protection. FROM SECTION 1: GENERAL COMMENTS ON THE CORE STRATEGY AND BACKGROUND CONTEXT Flood risk management The Core Strategy in general needs to be supported by a Strategic Flood Risk Assessment (SFRA). In particular, section 3.2 Proposed Spatial Strategy needs to demonstrate how the findings of the SFRA and consequently the PPS25 Flood Risk Sequential Test and Exception Test have been applied to the alternatives. The need for a SFRA to inform the Core Strategy is established at national	The UK and London BAP are referred to in Policy 7.19 of the London Plan and therefore do not need to be referred to in the Core Strategy. The Strategic Flood Risk Assessment is now published. A reference has been added to the London Rivers Action Plan 2009.

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							and regional level. This is stated in the Replacement London Plan October 2010, see below: Policy 5.12 E Flood Risk Management Within LDFs boroughs should in line with PPS25, utilise Strategic Flood Risk Appraisals to identify areas where particular flood risk issues exist and develop actions and policy approaches aimed at reducing these risks, particularly through redevelopment of sites at risk of flooding and identifying specific opportunities for flood risk management measures. and within this draft Core Strategy: 7 Appendix One - Documents of the Evidence Base 7.1 As discussed in section 1.4 of this document, a robust evidence base is important in developing a Core Strategy. Below is a list of some of the documents used by Greenwich Council in preparing the Core Strategy: Strategic Flood Risk Assessment (SFRA) - The SFRA is being prepared in accordance with current best practice and Planning Policy Statement 25: Development and Flood Risk (PPS25). Biodiversity We are supportive of the statements and policies with regard to biodiversity. We would recommend that the policies should also seek to support the protection, restoration and enhancement of biodiversity across the Borough through all new development, not just designated sites. Furthermore, the draft Core Strategy only makes reference to the Greenwich Biodiversity Action Plan (BAP) but it might be helpful to consider national BAP species and habitats. The need to consider creating opportunities for biodiversity to thrive and colonise at a landscape scale and through all development is in line with current thinking with regard to the direction of nature conservation in the UK, particularly with regard to the recently published Lawton review. Invasive non-native species are a particular threat to biodiversity across the Borough and it might be helpful to also consider inserting a statement with regard to coordinating action on these in terms of preventing spread, managing and controlling these and eradicating species where possible. Finally, we support the reference to enhancing and restoring rivers but this could be made more explicit within the document with particular reference to the London Rivers Action Plan. Land contamination The Core Strategy document mentions the need for a preliminary site investigation where the site is known or is likely to be contaminated. We would then expect to see a full assessment of risks to controlled waters from the land carried out in accordance with Planning Policy Statement 23 (PPS23), Annex 2. We are aware of a number of contaminated sites in the Greenwich area, in particular, on Greenwich Peninsula and at Charlton Riverside. We would encourage the use of sustainable drainage systems (SuDS) to control surface water run-off from roads, vehicle parking and public/amenity areas, providing there are adequate measures to protect groundwater and the site is not in an inner Source Protection Zone (SPZ 1). Water quality We note that the Sustainability Appraisal no longer specifies the protection and enhancement of water quality as a separate objective and that, possibly as a consequence of this, the key issues of waste water treatment and the protection of groundwater have been omitted. Waste water treatment This issue should be addressed separately within the Core Strategy. The Water Framework Directive sets ecological standards in addition to chemical standards for rivers. This is likely to place greater demands on Sewage Treatment Works to achieve cleaner effluents. The Core Strategy should address how the council will ensure that the rate of development broadly accords with the capacity of existing water supply, sewage treatment and discharge systems, particularly in connection with major new development. This is in line with the draft Replacement London Plan, Policy 5.14 which states: LDF preparation E Within LDFs boroughs should identify sewerage infrastructure requirements and relevant	

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							boroughs should support in principle the Thames Tideway Sewer Tunnels. Groundwater protection An important aspect of development/redevelopment is the protection of surface water and groundwater from land with previous contaminative land uses. The Thamesmead and Abbey Wood area is located in an area of high sensitivity in terms of the protection of groundwater as it is underlain by Principal (Major) Aquifers which are the Thanet Sand and Chalk Formations. Part of the borough lies within an Inner Source Protection Zone (SPZ 1) that relates to the use of groundwater from Deptford Pumping Station to supply water for human consumption. Surface water receptors include the River Thames, the Great Breach Dyke and the canal system. The sensitivity of surface water and groundwater quality is particularly important when it comes to redevelopment of land with an industrial legacy. We have therefore proposed an amendment to the text of Policy E(e) Contaminated Land in Section 2 below. Water resources We welcome Policy DH1: Design, which requires all developments to demonstrate water efficiency and demand management measures. The London Borough of Greenwich is in a designated area of serious water stress and targets currently exist in the London Plan for water efficiency. Greenwich is also situated in Thames Water London Zone, where a deficit in supply is currently met by use of the desalination plant, and further deficits will need to be met in future to meet demand from future growth. The 5-year (2004/05 to 2008/09) average water use in London Water Resource Zone is 161 litres per person per day, which is much higher than the England and Wales average of 148 litres per person per day. Therefore water efficiency measures will be essential to support new growth in the Borough. The Core Strategy should offer an opportunity for the Borough to exceed the targets in the London Plan and contribute to achieving sustainable water use. London Plan Policy 4A.16 Water supplies and resources sets a maximum water use target of 105 litres per person per day for residential development, a target which takes into account the standards in the Code for Sustainable Homes. We support the Council's requirement under Policy H5: Housing Design, that developers achieve Code for Sustainable Homes code level 6 by 2016. PROPOSED TEXT Policy E2 Flood risk Planning applications for all development in these areas and sites of more than 1ha in Flood Zone 1 must be accompanied by a flood risk assessment appropriate to the scale and nature of the development, the level of flood risk and the protection afforded by the existing defences. In developed areas at risk from fluvial flooding, development will only be permitted where appropriate flood defence measures are taken and it can be demonstrated that there is no increased risk of flooding to other sites. (Note: For reference of bold see PPS25 para E9) The Council will ensure that new developments safeguard existing tidal and fluvial flood defences and take into account the need to raise these and otherwise accommodate increased river levels in the future. Where works are being carried out in proximity to a tidal or fluvial flood defence the Council will seek to safeguard and where possible extend public access to the waterfront and protect and enhance existing ecological factors. Generally, consideration will be given to maintaining/improving the existing ecological features. Development should aim to be set back from the banks of watercourses, flood defences and flood defence facilities for operational and maintenance purposes. (Note: for reference of bold see Consolidated Draft Replacement London Plan October 2010 Policy 5.12 Flood Risk Management D Development adjacent to flood defences will be required to protect the integrity of existing flood defences and wherever possible should aim to be	

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							set back from the banks of watercourses and those defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost effective way.) Policy E(e) i The particular type of types of contamination; ii The problems of the ground exhalation of gases; iii The protection of controlled waters; and iv The restoration of land to beneficial use. WELCOME 4.6.13 to 4.6.23	
DCS85	Frank	King					Basically I applaud and agree with the vast majority of this section as set-out in the Core Strategy, but would like to make a few points: I. Solar Panels should be fitted to as many buildings as possible. Where they would not be feasible for residents, on blocks of Oats for in stance, they should still be fitted to supply electricity for the lighting and lifts in and adjacent to the block of Oats. 2. The River Defences must be raised by four feet a long the whole riverbank above the present highest defences as, according to research, this is the height that some North Sea Tides will cause on the Thames over the next 50 years. The general consensus is that these extreme tides will occur, on average, every 4 years after 2015. 3. Electric Charging points should be built into all new housing developments, with Community Points every 250 yards for visitors to the area and those living in higher rise properties. 4. The proposed housing developments along Woolwich Road/Trafalgar Road will be strangled and become a white elephant if vastly improved transport links are not provided before, or with, the building of this housing. 5. Thames Water Ltd. must be al lowed to carry-out their sewer improvements before the houses are built, rather than trying to carry-out these works after the building has taken place. Therefore, as part of the Core Strategy, Thames Water should be consulted about their plans, and encouraged to bring them forward where necessary. This applies to all developments including Kidbrooke . The savings to both Thames Water, and the inconvenience caused when they have to go under existing buildings, would be well worthwhile if access were given for these works on open sites before buildings are erected. Policy E (a), (b) and 5.6.1. & 5.6.4.: I do not know if any studies have been carried out into pollution from over flying aircraft, but a study might well be worthwhile for the general health of the population of Greenwich. The Borough is used extensively as a stacking area for Gatwick, Heathrow and City Airports. The resulting pollution may well be a health issue for the people of the Borough. I do not know if this is the case, but suspect that it might be.	Policy E1 supports the incorporation of renewable energy generation within development proposals. The Strategic Flood Risk Assessment has concluded that most of Greenwich is protected from events in the tidal Thames to a standard of over and above the 0.1% annual probability flood (1000 year return period), by the Thames Barrier and raised defences such as walls and concrete capped embankments. Policy 6.13 of the London Plan 2011 requires 1 in 5 new parking spaces to have an electric charging point. Policy E(c) supports this and other measures to reduce emissions. The Charlton Riverside Masterplan SPD sets out a vision for improving transport infrastructure including a riverside transit system and improved bus services.
DCS52			Greenwich Hospital	Neil	Lucas	Drivers Jonas Deloitte	Greenwich Hospital considers that energy efficiency in new development should be promoted as a primary consideration above the provision of renewable energy (Policy E1). Energy efficiency is the primary focus of the London Plan (2008) energy hierarchy and therefore should be emphasised within the Core Strategy. This is particularly relevant in Greenwich as balancing renewable energy technology and energy efficiency measures in historic buildings and sensitive areas can be complex, whereas reduction of carbon emissions via energy efficiency measures is considered a more viable and effective approach.	Policy E1 has been amended to better reflect the energy hierarchy in the draft replacement London Plan and the aim to reduce Carbon Emissions.
DCS55			Sainsburys Logistics Limited	Christiaan	Robinson	Turley Associates	Sainsbury's Logistics Limited welcome and fully support the development of low carbon buildings. Sainsbury's have a strong corporate commitment to sustainability and ongoing investment in the development of low carbon	Policy E1 has been amended to better reflect the energy hierarchy in the draft replacement London Plan and the aim to reduce Carbon Emissions.

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							buildings through the use of energy efficiency mechanisms and plant and, where appropriate, renewable and low carbon technologies. Sainsbury's Logistics Ltd primary focus is to minimise energy use within the building before examining how energy can be supplied. Such an approach is in accordance with the energy hierarchy of the London plan. With regards to policy EN1 we believe that the policy of 20% CO2 reduction in addition to that required by the Building Regulations may pose a significant financial constraint particularly if this is in addition to the installation or connection to a combined heat and power system. Sainsbury's Logistics Ltd suggest therefore that flexibility with the energy strategy and final CO2 reduction targets are needed to identify the most commercially and technically viable solutions to the development of a low carbon building.	
DCS81	Linda	Hodgson	Heathway Residents Association				4.6 Environment and Climate Change - We would recommend and support a higher aspiration in terms of climate change management, with a specific preference for carbon neutral projects. The following sections should be reviewed and amended accordingly. P115 4.6.3 Bullet 3 - replace with general carbon neutral systems p117 Policy E1 Carbon Emissions - aspire to carbon neutral, not specific technologies	Policy 5.2 of the London Plan 2011 requires that residential buildings are zero carbon from 2016 and non domestic buildings are zero carbon from 2019
DCS78		Berkeley Homes	Berkeley Homes (Urban Developments) Ltd	Bob	McCurry	Barton Willmore	Policy E1: Carbon Emissions 4.30 Draft Policy E1 at present does not reflect current guidance and when viewed alongside Draft Policy H5 (i) in the Draft Core Strategy provides a policy position that could potentially cause confusion for applicants. In addition, Policy E1 is not aligned with emerging policy in the DRLP which excludes any reference to reducing carbon dioxide emissions by at least 20% through the use of renewable energy generation from Draft Policy 5.7. 4.31 It is not the function of the Core Strategy to set Borough wide targets for on-site renewable energy generation. The rationale for any specific on-site generation policy is rapidly disappearing as a result of the national zero carbon policy, but in any event all decisions need to be taken in relation to the specific development context. Local requirements will also need to conform to the national policy on 'allowable solutions' once this has been defined, but national policy, on the basis of the draft Replacement Supplement to PPS1, is likely to phase out Merton-style rules specifying targets for energy generation from on-site renewables as this will no longer be necessary. 4.32 therefore, it is contrary to emerging regional and national planning policy to specify a specific level of contribution to be made towards the reduction of carbon emissions from renewable energy technologies. In addition, the draft policy at present will place undue financial burden on developers and should be revised alongside policy H5(i) to provide clarity and guidance to applicants. Furthermore, due to the standard of existing technology, we are not aware of any scheme in London that has achieved a 20% reduction in carbon emissions from the use of on-site renewable energy technologies. We are therefore of the view that the policy objective is technically unachievable taking into account all other requirements set out within the relevant planning policy framework for any given development proposal. 4.33 The draft Policy should be amended to ensure it is: aligned with the Government's Definition of Zero Carbon Homes and Draft Replacement Supplement to PPS1; in conformity with the Draft Replacement London Plan (Lean, Clean, Green); and compliments the design and construction/housing design Policy (Policy H5(i)). 4.34 The policy	Policy E1 has been amended to better reflect the energy hierarchy in the London Plan and the aim to reduce Carbon Emissions.

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Environment - Question 14: Environment and Climate Change (Refer to sections 4.6 and 5.6)**	**Council Response**
							should help to facilitate the transition to zero carbon living and the following is suggested: the Policy requirement for renewable energy generation (20%) should be deleted and replaced with the steps set out in the zero carbon hierarchy; guidance on a carbon offset fund should be included to 'future proof' the document.	
DCS90	Mrs	Abraham	Mansoor				What this Council have ever done to monitor climate change in the whole of Greenwich? Once residents from Greenwich area were complaining about CC - no further investigation carried out, yet this CC has been getting worse - exhaust carbon monoxide.	No action required

Question 15- Cohesive and healthy Communities

	CONSULTEE			AGENT				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Cohesive and Healthy Communities - Question 15: Cohesive and Healthy Communities (Refer to sections 4.7 and 5.7)**	**Council Response**
DCS8	James	Williams	London - Abbey Wood Congregation of Jehovah Witnesses				Policy CHI Cohesive Communities, appears to be a positive drive to address "inequalities between areas" ,and supporting the development of new and improved community facilities, where there are identified needs. There exists a considerable Brownland and Industrial acreage in the Borough much of which has been unoccupied for a considerable period of time, with an increasing need for Community facilities, re-clasification may fill a need without the loss of community site, building or facility with existing use rights.	Comment noted. No action required.
DCS10			CIS Ltd	Richard	Blyth		No comments	
DCS12	Isabel	Assaly	Natural England				Policy CH2 Healthy Communities With regards to point iv., this is especially important with regards to Areas of Deficiency in Access to Natural Greenspace.	Reference to areas of deficiency has been added.
DCS13	David	Kerr					Policy CH1 Cohesive Communities (page 123 et seq) Please consider expanding the list at 4.7.7 to include Care Homes. Two years ago the Council's decision to refuse demolition of a Care Home was overturned on appeal because a developer argued successfully that Care Homes were not specifically covered by the list in the UDP.	Care Homes are not classed as community facilities so it would be inappropriate to include them in the list at 4.7.7 Proposals for new care homes will fall under the supported housing policy H(d).
DCS23	Nigel	Abbott	Cluttons LLP				No comment	

DCS24	John	Franklin	Greenwich Society				STRATEGIC POLICIES Para 4.7.1 We welcome the general approach: A cohesive and healthy community is one ... where people feel they have an influence on decision making and ... a pride in the community that they are part •. But this is too little reflected in what follows. For large new developments (para 4.7.12) there are to be Community Development Strategies aimed at establishing management companies involving residents. But otherwise (para 4.7.6) the development of community facilities is merely to reflect both the local needs of the community and the Councils delivery strategy, with no indication of how these needs are to be established. Policy CH1 Cohesive Communities: ii & iii outline recommendations that can be applied prior to the granting of planning permission. Plans should be designed to make for natural surveillance and easy access to discourage crime and produce safe streets. In practical terms this means avoid nooks and crannies where criminals can hide an aspect already regularly included in Greenwich Society comments on planning applications. Ensuring safety on streets and open spaces, and suitability for the disabled, can be influenced through design and controlled at the planning stage, and must be the developers responsibility. The maintenance of these spaces is the Councils own responsibility. This not made clear. Supporting new and improved community facilities where there are identified needs• - it would be preferable if the actual needs and proposals could be identified: good access to buildings, protection of local services including retail, encouraging the arts and insuring a successful mixed tenure of new buildings. Much of this can be achieved through planning obligations attached to applications and would then presumably be funded by developers. However where applied to public buildings other finance may have to be found. Para 4.7.4 says that the Council will work with the Greenwich Partnership and other partners• to support the policies, but the Borough-wide Partnership is clearly unsuitable for consultation on these local community issues. (This is a general defect in the Strategy, discussed further under ˜Implementation below). Para 4.7.5 There is a reference to the ˜Greenwich Community Safety Plan with the objective of creating a cleaner and safer environment•. We suggest that the Community Safety Plan be included in this Strategy so that definite proposals could be considered by reference to it. DEVELOPMENT MANAGEMENT POLICIES Policy CH(a) Loss of Community Facilities This part of section 7 is designed to ensure that any change of use or reduction in local community facilities will not be allowed unless alternative and equal facilities are provided elsewhere. The Society supports this, and would wish to add that the location of the replacement must be within easy reach of the original health, education, social services buildings, open spaces and all aspects of community life. The policy says that •planning permission that would result in the loss of community facilities through change of use or redevelopment will only be granted where ... it would enable the implementation of the Councils strategy for the provision of community facilities•. The risk of such redevelopment is recognised in para 5.7.1 " the land and buildings used for community facilities are generally of low financial land value• " so it is all the more important that in these cases, such as the loss of a primary school, local community views should be given full weight, as against the Councils ˜strategic objectives. The section should recognise this.	Needs for community facilities are established in the Infrastructure Delivery Plan and the Council has worked with partners, including those in the Greenwich Partnership, on this. Any infrastructure obligations for developers are detailed in the Council's Planning Obligations SPD and also, in future, the Community Infrastructure Levy. Clearer reference is now made to this in the Core Strategy. The maintenance of open spaces in the Borough is not always the Council's responsibility - this depends on the ownership of them. Policy CH a) already notes that any alternative community facilities provided will need to be within the local area.
DCS25		Waite					a) there is an overemphasis on 'vibrancy'. Is no-one aware of the many studies supporting the value of 'tranquility' in good health? b) Further, if decision making is so crucial to a healthy community, then LBG should ensure that residents do have influence, not merely the illusion that their views are taken into account. All too often, consultations are of the 'get it off your chest then we will ignoreand over-rule you' type.	The benefits of parks and open spaces to health has now been expanded upon.

DCS26	Malcolm	Souch	NHS London Healthy Urban Development Unit (HUDU)				Thank you for the opportunity to comment on the draft document. Overall health issues are well integrated into the document and the policies are likely to have a positive impact on health. In particular, the section on cohesive and healthy communities is welcomed and the cross-cutting policy on healthy communities (Policy CH2) is strongly supported. The following comments should be read in conjunction with comments from NHS Greenwich. Criterion iii. of Policy CH2 which seeks to improve access to health facilities in the Borough is supported. However, no assessment of infrastructure requirements has been provided at this stage, but it is noted that an Infrastructure Delivery Plan is currently being prepared.	The Infrastructure Delivery Plan provides more detail on infrastructure requirements within the Borough, this will be published alongside the Submission version Core Strategy.
DCS30	Rose	Freeman	The Theatres Trust				Policy CH1 Cohesive Communities We support this policy generally and note that arts and culture facilities are included in examples of the term ˜community facilities. However we take issue with item vii of the policy on page 124 when many community arts and culture projects will have their local funding greatly reduced or terminated from 1 April. This is not ˜encouraging community arts and culture projects and will result in a conflict with Policy CH(a) where venues for community projects will become unviable when the projects that they house will close due to lack of funding. This will not support ˜healthy communities. Paragraph 5.7.1 states that land on which community facilities are sited ˜are generally of low financial land value. This is not correct for inner London Boroughs - the ever increasing requirement for affordable housing will mean that community facilities may come under pressure from uses which attract higher land values and without protection against this, the community may lose an accessible facility. Once these sites are lost to other uses it can be very difficult to find alternative sites in the future. Demand for different types of community facilities will change over time but it is important these premises are retained to meet the future needs of residents and visitors. The safeguarding of existing community facilities will help to realise the potential for community-use of existing buildings and encourage re-use of buildings when they become available.	Reference to promoting community arts and culture projects has now been removed as it is felt this is sufficiently covered in point iv of the policy. Reference to land values has been removed as this could be misleading and is not necessary.
DCS32	Nicolas	Long					I have concerns that the potentially huge influx of new residents will put a major strain on the infrastructure and there seems to be no reason to believe that it will lead to a stronger sense of community, particularly given the lack of schooling opportunities in the area	The Council's Infrastructure Delivery Plan sets out needs for infrastrucuture in the Borough over the period of the plan, this will be published alongside the Submission version Core Strategy. Policy IM1 is intended to facilitate this.
DCS33	Caroline	Evans					The existing OA7 residential and commercial communities are situated along both sides of the Creek, Norman Road, Greenwich High Road, and into the Ashburnham Triangle Conservation Area. Over the last four years, Greenwich has given planning approval for 3,500 new residential units in this area, adding an estimated new population of some 8,000. The new residents will be arriving just as the Core Strategy kicks in. Nearby, Lewishams massive Lethbridge development will dwarf these numbers over the lifetime of the Core Strategy and, as noted, there are a series of further sites within the OA7 area which are certain to increase numbers further post-2012. So far, no coherent local plan has been drawn up which attempts to explain how the existing and new communities within the OA7 area will come together to achieve the various targets for Cohesive and Healthy Communities described in 4.7. 4.7.8 & 9 refer to the role school provision plays in creating a sense of community. There is already a problem with school places in the OA 7 area. There is also a shortage of GP surgeries. Co-ordinating the provision of an infrastructure for the new combined OA7 community, across both sides of the Creek, further underlines the need for specific local planning at neighbourhood level within the Core Strategy, preferably via an SPD.	The Council's Infrastructure Delivery Plan sets out predicted needs for infrastructure in the Borough over the period of the plan, in order to ensure it is sufficient for the growth proposed. Policy IM1 is intended to facilitate this. Although a more detailed plan has been considered for this area, there is now limited future development potential on sites that are either undeveloped or do not have planning permission, and it is therefore not felt necessary at this stage.

DCS34	Palvinder	Banwatt	Charlton Central Residents Association				6.0 Cohesive and Healthy Communities The strategy defines a cohesive and healthy community as one that is both mixed and integrated, where there are good quality local services and facilities for the community to use, where there is a choice of housing, where people feel safe, where people feel that they have an influence in decision making and perhaps, most importantly, where people have a pride in the community that they are part of. We have already identified above that the Central Charlton area lacks the services and facilities to meet some of the criteria for a cohesive and healthy community, yet there is no provision in the strategy to make enhancements here. For example there is a disproportional representation of fast food outlets in the parade of retail units in Charlton Church Lane whereas the community would benefit from greater variety of shops and services to meet our needs. We are concerned that, in the strategy, the aspirations of local people have been watered down except where larger facilities such as town centres are being considered. We feel that there is inadequate consideration of how the health needs of a growing population will be met. Does the Queen Elizabeth Hospital have sufficient capacity to meet the future demands from Greenwich and Bexley residents? What other primary care facilities will be developed in the Borough? Finally Central Charlton lacks suitable leisure facilities. Opportunity to use the gym at Charlton Athletic Football Stadium has been withdrawn resulting in the residents having to travel to leisure centres in Greenwich, Eltham or Woolwich for fitness and recreational purposes. The strategy suggests that the development at Charlton Riverside may include leisure facilities but it is unclear what these may be. A stronger commitment to reducing the deprivation in this area to truly build a cohesive and healthy community is required. We recognise that contributions from large developments can do much to improve facilities and develop cohesive and healthy communities. Our understanding is that, in the past, the donations have primarily been used for training purposes. We feel that alternatives such as improvements to the environment should also be considered.	Policy TC(c) aims to control the location and concentration of hot food takeaways and policy TC7 aims to protect neighbourhood parades and local centres and ensure there is an appropriate mix of uses. It should be noted that the Core Strategy can only control land use and cannot control the type of retail that occupies a unit. The Council's Infrastructure Delivery Plan provides further detail on health infrastructure in the Borough and this is now reflected in this chapter. Leisure facilities have been assessed in the Council's Open Space study. There was not found to be any specific need for additional leisure facilities in Charlton although new playing pitches, changing facilities and outdoor table tennis are being installed in Charlton Park.
DCS38	Metropolitan Police Authority		Metropolitan Police Authority	Brian	Coughlan	CGMS Consulting	Policy CH1 Cohesive Communities Section (i). of this policy ensures developments consider community safety and aim to discourage crime, section (iv) supports new and improved community facilities, and section (vi) promotes the protection of local services and encourages a mix of community and retail uses in existing local centres and neighbourhood parades. The preceding three points are strongly welcomed in the context of 'community facilities' including policing facilities. London Plan Policy 3A.18 'Protection and enhancement of social infrastructure and community facilities' lists a number of uses which are included in the definition. This list includes 'policing facilities' as noted in the policy section above. Consequently it is strongly recommended that section 4.7.7 is altered to include an additional point relating to policing facilities. Proposed wording is as follows: ¢ Policing facilities The inclusion of policing facilities within this list is of upmost importance and would ensure that the rest of the document accurately relates to policing needs Policy CH(a) Loss of Community Facilities This policy recommends the retention of community facilities unless: an alternative community facility of a similar nature is provided locally; it would enable the implementation of the Council's strategy for the provision of community facilities; or the site is demonstrably unsuitable for continued use as a community facility. It is envisaged that this policy will facilitate the implementation of the MPA/S Estate Strategy and is strongly welcomed.	Policing facilities have been included in the list of community facilities. Policy CH(a) has been strengthened so that where there is a loss of community facility, an alternative must always be provided.

DCS40	Clare	Kemsley					I live on Greenwich High Road and feel strongly that there should be appropriate detailed long-term plans for the areas development. In particular, we need a supplementary planning document for the immediate area. I make particular reference to the two strategic objectives of the Draft Core Strategy: * ˜to protect and enhance Greenwichs rich natural and built heritage * ˜to promote high quality architecture and urban design in all developments in Greenwich. Its important that Greenwich High Road sees effective implementation of these objectives. A lot of piecemeal development has already happened or been planned, and I dont think that it all meets these criteria. However, we should not assume that its too late to implement more appropriate planning. Immediate steps should be taken to make sure any further development is planned and controlled with a supplementary planning document or equivalent neighbourhood plan. The architectural character of the area should be improved (or maintained where appropriate), rather than worsened by development. And it must have a positive impact on the experience of current and future residents. I am keen to continue living on Greenwich High Road and I hope that new developments retain whats good about the area, and make real improvements where necessary. However, we cant rely on piecemeal planning to achieve this. I have strong concerns that without appropriate long-term planning, it may deteriorate as a residential area rather than improve. I hope the council is able to ensure that a supplementary planning document is produced for our area.	Although a more detailed plan has been considered for this area, there is now limited future development potential on sites that are either undeveloped or do not have planning permission, and it is therefore not felt necessary at this stage.
DCS42			Greenwich Peninsula Regeneration Ltd	James	Wickham	Gerald Eve	Policy CH1, Cohesive Communities and Policy CH2, Healthy Communities We object to the standardised requirement for the completion of a Community Development Strategy• for developments of over 50 homes. This requirement adds further onerous detail for developers to provide during the application process and could further delay housing delivery. Such strategies should only be sought, post-grant of permission, in cases where the planning authority considers there may be a particular risk of lack of integration or social cohesion. In the same way, we also object to the requirement for a Health Impact Assessment• for major applications as this will further disincentivise development. The potential direct health implications of new development, for example noise and air quality, can be adequately controlled through existing policies relating to them. The definition of major application• is also unclear.	It is felt important that all developments consider community integration and that a community development strategy can always provide some benefit in achieving this. Health Impact Assessments are important in showing consideration of the health impacts of a development and should not be an overly onerous process. Major development has now been more clearly defined in the glossary.
DCS43	Barbara	Reid					Theres no coherent local plan which attempts to explain how the existing and new communities within the OA7 area will come together to achieve the various targets for Cohesive and Healthy Communities described in 4.7. 4.7.8 & 9 refer to the role school provision plays in creating a sense of community. There is already a problem with school places and GP surgeries in the OA 7 area. Specific local planning at neighbourhood level is needed within the Core Strategy, preferably via an SPD.	Although a more detailed plan has been considered for this area, there is now limited future development potential on sites that are either undeveloped or do not have planning permission, and it is therefore not felt necessary at this stage. The Council's Infrastructure Delivery Plan provides more detail on future infrastructure requirements in the Borough.
DCS45	Peter	Rice					agreed	
DCS47			Tesco Stores Ltd		Russell	Nathaniel Lichfield & Partners Ltd	Draft policies (CH1 and CH2) make excessive and unnecessary demands for information to be submitted with planning applications, some of which fall outside the reasonable scope of land-use planning considerations to be considered on individual planning applications. The level of information sought is inappropriate for inclusion within a strategic level document namely the Borough's Core Strategy, adds to the burden of information sought for a major application of the type sought by the Council within a high-growth strategy namely housing proposals and does not demonstrably result in any tangible enhancement to a scheme over and above those which have been submitted and approved by the Council up to this point. The need for a "Community Development Strategy" for scheme of over 50 residential units or a "Health Impact Assessment" for proposals is not provided.	It is felt important that all developments consider community integration and that a community development strategy can always provide some benefit in achieving this. Health Impact Assessments are important in showing consideration of the health impacts of a development and should not be an overly onerous process.

DCS48	Peter	Luck					See Q18	
DCS60	Lawrence	Smith	Westcombe Society				CH2 New development must include health and social provision from the start as this provision is already stretched in Greenwich. (see also answers to question 9 H1, 12 DH2 and DH3)	The Council's Infrastructure Delivery Plan provides further detail on future infrastructure requirements and policy IM1 provides more detail on how this will be delivered via planning obligations and, in future, the Community Infrastructure Levy.
DCS64			London Fire and Emergency Planning Authority	Donald	Messenger	Drivers Jonas Deloitte	Community Infrastructure The LFB note paragraph 4.7.7 which states that community facilities are those facilities used by the local community,• and does not include fire stations. The LFB also note paragraph 6.1.17 which states that the emergency services are included within social and community infrastructure. The LFB therefore understand that fire stations are not subject to Policies CH(a) and CH1, which specifically relate to community facilities. For the avoidance of doubt, the LFB request that the following is added to paragraph 4.7.7: Please note emergency services fall within social and community infrastructure (paragraph 6.1.17)•	Fire safety facilities have now been included in the list of community facilities.
DCS67	A.E.	Hart					4.6 The London Plan is fundamentally flawed and the Borough should resist pressures to take such increases in population into the Borough that are proposed. 4.7.1 to 4.7.6 This is already a densely populated Borough: where people live in such close proximity there are social and other pressures which can lead to ill-health, both mental and physical, increased stress and tension and poor social cohesion.	The housing figures in the London Plan cannot be challenged at this stage.
DCS69	Laurie	Baker	Eltham Society				The Society supports the principles set out in these policies	Noted
DCS76			Her Majesty's Court Service	Amy	Jones	DPP	Policy CH1 Cohesive Communities HMCS plays a key role in the delivery of safe and secure neighbourhoods and communities, alongside other delivery partners, such as, the Metropolitan Police. It is our experience that whilst schools and health care services are typically addressed as part of community and infrastructure needs, the role that the courts play in the community is often overlooked. The important role that HMCS has in supporting communities has been recognised in the Draft London Plan that was issued for public consultation in October 2009. Paragraph 3.79 lists facilities that form part of social infrastructure and states that these include criminal justice or community safety facilities•. We therefore recommend the following change to part iv) of proposed Policy CH1; supporting the development of new and improved community facilities, including criminal justice facilities, where there are identified needs and where the development is in line with the Council's strategy for the provision of services (see also Policy C1). Facilities should be easily accessible for all and be located in or on the edge of town or local centres unless a special need for a location elsewhere can be demonstrated• To accord with the above requested change we also request that the following bull pointed list following paragraph 4.7.7 be amended as follows; ¢ Buildings used by voluntary sector groups; ¢ Libraries or public reading rooms; ¢ Criminal Justice facilities; ¢ Social service and day centres . . . .• Policy CH(a) Loss of Community Facilities Proposed Policy CH(a) seeks to protect against the loss of existing community facilities. We agree with this Policy in principle and support the aims of the Policy. However, we have concerns regarding the effective implementation of this Policy. Part i) of the Policy states that where community facilities will be lost alterative community facilities, of a similar nature, should be provided locally in the areas that the community facility serves. As with many other community facilities the Courts have large catchment areas that go beyond the local scale. Where the closure of an existing Court facility is proposed this forms part of a wider strategy to ensure comprehensive and effective Court provision. To ensure that proposed Policy CH(a) is effective and allows flexibility to achieve this wider strategy for the Courts we suggest the following amendment to wording of Part i); Alternative community facilities	Criminal justice and community safety facilities have now been included in the list of community facilities. The suggested wording change to policy CH(a) has been actioned.

							of a similar nature are provided locally in the area within which that facility serves;• We consider that it would be unreasonable for all lost community facilities to be provided locally as in many cases this will not relate to the need or catchment for a particular facility. The above suggested wording of the Policy seeks to overcome this issue.	
DCS84	Anna	Townend	Greenwich Environment Forum				Bedrock of a healthy community is still the family. Families come first but the elderly need much more positive support and acknowledgment of their life long service and value within society and the young support encouragement and the settup of good aspiring examples.	It is recognised that there is a need for more mixed communities in the Borough and the Core Strategy's housing policies aim to deliver this.
DCS85	Frank	King					Again I agree with the vast majority of this section as set-out in the Core Strategy, but would like to make a few points: 4.7.7. & 4.7.16: With so many houses being built in Charlton and the Peninsula, Health Services must be seriously considered. Doctors Surgeries and other Surgeries and Clinics are already overstretched in North Greenwich. Urgent consideration must be given to planning healthcare now. The minimum requirements are at least one Doctors Surgery, one Dentist and one general Clinic for this area. My preferred option would be a PolyClinic on Bugsby's Way somewhere between Pear Tree Way and John Harrison Way. This PolyClinic should contain a full range of Medical Services including: Doctor's Surgeries for ten Doctors and five Practice Nurses and a base for District Nurses together with X-Ray and Ultrasound Equipment; a Dentist's Surgery for two, or more, Dentists; An Optician; A Foot Clinic and a Dispensing Chemist together with any other NHS Services which might be required. This must be a purpose built building with full access for disabled and good transport links, with bus stops directly outside and disabled parking and drop-off points. This building would be commercial as professional tenants would be only too willing to relocate in such an up-to-date facility. It could therefore be built by the same developers that are building the houses, and then either purchased by, or leased to , the Practices contained therein. Alternatively, the New Doctor's NHS Consortium may wish to purchase it and sub-le t to the Practitioners. 4.7.18: There should be a complete ban on any unhealthy fast food outlets Viz: Pizza; McDonalds; Kentucky Fried Chicken ; Kebabs; Fish and Chip Shops etc. There are far too many of these places around now and they are the main reason for the rise in obesity in Greenwich and in the Country. Healthier options could be encouraged such as Sandwich Bars; Cafes and Restaurants and other establishments that provide wholesome food. On this subject I firmly believe that no planning permission should be given for any of those unhealthy fast food outlets in any part of the Borough from now on. Those that exist cannot, of course, be closed down, but the Council could ensure that no more come into the Borough . This Policy would improve the health of all of the residents of the Borough in the next 30+ years as even those that exist now would gradually disappear. If, as you admit in Policy TC (d) that these outlets are unadvisable for school children, then surely this applies to the population in general and that ALL OF THESE OUTLETS SHOULD BE DISCOURAGED ON HEALTH GROUNDS.	The Council's Infrastructure Delivery Plan provides further detail on future health infrastructure requirements following consultation with the PCT and policy IM1 provides more detail on how this will be delivered via planning obligations and, in future, the Community Infrastructure Levy. The planning system can only control the use of land and cannot control the occupier of that use. Policy TC(c) regulates the location and concentration of hot food takeaways.

Question 16- Infrastructure

Consultee			Agent				
Given Name	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Infrastructure - Question 16: Infrastructure (Refer to sections 4.8 and 5.8)**	**Council Response**
Lucy	Owen	Port of London Authority				Infrastructure: The Core Strategy makes references throughout the document to poor north-south transport links and the how the Borough would benefit from a package of river crossings â€˜to address the severance of the River Thames.â€™ Any proposed river crossings would need early discussions with the PLA to ensure that they did not have a detrimental impact on navigation, river regime or environment. Policy C2 Waste Apportionment: The policy safeguards Days Aggregates, Lombard Walk for waste transfer. This site also handles aggregates over the jetty so whilst the PLA welcomes the safeguarding for waste transfer it is questioned whether a wider safeguarding for cargo handling, including waste transfer would be more appropriate. Policy C3 Critical Transport Infrastructure: The policy seeks amongst other things to work to deliver a new package of River Thames Crossings and supporting the use of the river for transport purposes including upgrades to the Woolwich Ferry Service, a ferry service at Gallions Reach and an extended river bus service to Thamesmead. Given the fact that the Borough has safeguarded wharves, why not make reference to them in this policy as critical transport infrastructure for the transport of freight? Additionally, why is the proposed boat yard at Bay Wharf not included in this policy as this is a piece of critical transport infrastructure. Any proposed river crossings and piers would need early discussions with the PLA to ensure that they did not have a detrimental impact on navigation, river regime or environment. Policy C(d) Freight: Pleased to see the references to safeguarding sites that enable the transport of freight by water and supporting proposals that increase the proportion of freight that is water borne. Whilst this approach would appear to be consistent with London Plan policy, there is the opportunity to widen to policy to include a reference to maximising water transport for bulk materials, particularly during demolition and construction phases in line with policy 4C.8 of the London Plan.	Reference to safeguarded wharves has now been put into policy IM5 Freight. Specific reference to Days Aggregates and Bay Wharf has not been included as they are not safeguarded or recommended for safeguarding in the London Plan Implementation Report: Safeguarded Wharves on the River Thames. Policy IM5 has been stengthened to include maximising the movement of bulk materials by water. Policy 5.17 G(a), Waste Capacity, of the London Plan states that Boroughs should bring forward land to manage waste apportionment through protecting and facilitating the maximum use of existing waste sites. Days Aggregates is one of a number of existing strategic waste sites in the Borough which is safeguarded in the Core Strategy for this reason. It is not considered appropriate therefore to safeguard the site also for cargo handling.
		Network Rail				RE: Greenwich Draft Core Strategy and Development Management Policies Consultation Thank you for consulting Network Rail regarding the above consultation. At this stage we have no specific comments regarding this consultation. We would however like to make you aware of the following; Crossrail The timescale for delivery has been extended by one year to 2018. During the construction period there will be some disruption to services as the track between the Woolwich portal is reconfigured and Abbey Wood station rebuilt. The construction strategy is being developed in line with other major schemes (see below). Train lengthening The industry is undertaking a programme of train lengthening on the suburban routes. This will entail lengthening platforms on Bexleyheath and Woolwich lines. It is anticipated that the much-needed additional capacity will be available before the Olympics and therefore ahead London Bridge rebuilding for Thameslink. Thameslink Although the borough is not on the Thameslink route, passengers will be affected by construction works at London Bridge (post-Olympics). The strategy to re-build London Bridge will be developed in line with the major projects highlighted above. We would very much like to be kept informed of future consultations and publications on this and other LDF documents. Should you wish to discuss any specific sites, policies or infrastructure provision, please do not hesitate to contact Network Railâ€™ s Town Planning Team.	Comments noted.
Paul	Webbewood					I didn't understand the figures in para 4.8.10. These possibly need some explanation	Further explanation of the waste apportionment figures has been added.
		CIS Ltd	Richard	Blyth		No comments	

	WM Morrison Supermarkets Plc	WM Morrison Supermarkets Plc			Peacock and Smith Limited	Emerging Policy C(c) is too stringent, especially those proposed measures that seek to establish development in town centres as 'car free'. In order to fulfil the objectives of Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4) and Planning Policy Guidance 13: Transport (PPG13), It is necessary for town centres to provide sufficient car parking facilities to make 'in-centre' stores equally attractive and competitive as out-of-centre retailing destinations. Car parks associated with foodstores with the town centre provide short term parking facilities for shoppers and visitors to the centre as a whole. The car parking provision therefore helps to enhance the vitality and viability of centres. In terms of the policy direction in the adopted London Plan (February 2008), Policy 3C.24 and the associated written justification allows for additional public car parking within town centres to suppor the locational advantages of centre and to provide for attractive, viable development therein. We therefore considet that emerging Policy C(c), as currently drafted, is unsound. The emerging policy is not consistent with PPS4, PPG13 and the adopted London Plan, and is not 'flexible' (in order to be effective, as requested by Planning Policy Statement 12: Local Spatial Planning).	Parking requirements in the London Plan (Policy 6.13) are maximum targets and it is therefore considered reasonable to request developments go below these. The Borough parking plan assesses overall public parking provision to ensure that this is sufficient to meet demand. Text has now been added to the support text of Policy IM(c) to state that flexibility may be required over the standards where there is a need for additional public parking in town centre locations.
		National Grid	Damien	Holdstock	Entec UK Ltd	NATIONAL GRID INFRASTRUCTURE WITHIN GREENWICH COUNCIL'S ADMINISTRATIVE AREA Electricity Transmission - National Gridâ€™ s high voltage electricity overhead transmission lines / underground cables within Greenwich Councilâ€™ s administrative area that form an essential part of the electricity transmission network in England and Wales include the following: - 275kV underground cables from Newcross substation in Southwark to Hurst substation in Bexley - 275kV underground cable from Barking substation in Barking and Dagenham to Northfleet West substation in Dartford Gas Transmission: National Grid has no gas transmission assets located within the administrative area of Greenwich Council. Gas Distribution: Southern Gas Networks owns and operates the local gas distribution network in Greenwich Council administrative area. Contact details for Southern Gas Networks can be found on the Energy Networks website: www.energynetworks.org THAMESMEAD AND ABBEY WOOD OPPORTUNITY AREA Thamesmead and Abbey Wood, identified in the Draft Core Strategy as areas which will accommodate development, are crossed by one of National Gridâ€™ s high voltage underground electricity transmission cables. Our underground cables are protected by renewable or permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our electricity transmission network. Hence we require that no permanent structures are built over or under cables or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the cable route or its joint bays and that unrestricted and safe access to any of our cable(s) must be maintained at all times The information supplied is given in good faith and only as a guide to the location of our underground cables. The accuracy of this information cannot be guaranteed. The physical presence of such cables may also be evident from physical protection measures such as ducts or concrete protection tiles. The person(s) responsible for planning, supervising and carrying out work in proximity to our cable(s) shall be liable to us, as cable(s) owner, as well as to any third party who may be affected in any way by any loss or damage resulting from their failure to locate and avoid any damage to such a cable(s). The relevant guidance in relation to working safely near to existing underground cables is contained within the Health and Safety Executiveâ€™ s (www.hse.gov.uk) Guidance HS(G)47 â€œAvoiding Danger From Underground Servicesâ€• and all relevant site staff should make sure that they are both aware of and understand this guidance. Our cables are normally buried to a depth of 1.1 metres or more below ground and cable profile drawings showing further details along the route of the particular cable can be obtained from National Gridâ€™ s Plant Protection Team. Cables installed in cable tunnels, deeper underground, whilst less likely to be affected by surface or shallow works may be affected by activities such as piling. Ground cover above our cables should not be reduced or increased. The relocation of existing underground cables is not normally feasible on grounds of cost, operation and maintenance and environmental impact and we believe that successful development can take place in their vicinity. INFRASTRUCTURE DELIVERY PLAN Specific development proposals within the Greenwich Council area will not have a significant effect upon National Gridâ€™ s gas and electricity transmission infrastructure. It is unlikely that any extra growth will create capacity issues for National Grid given the scale of these gas and electricity transmission networks. The existing networks should be able to cope with additional demands. The electricity distribution company in the area is EDF Energy Networks and the gas distribution company is Southern Gas. It will be these suppliers who should be contacted for further information regarding constraints and opportunities that the distribution networks may have on specific sites and growth in the area, and not the transmission network	Comment noted. No action required. Comments have been incorporated into the Council's Infrastructure Delivery Plan (IDP). The IDP will be published alongside the proposed submission version of the Core Strategy as part of the evidence base.

						which operates at a much more strategic level. Contact details for EDF Energy Networks, and Southern Gas Networks can be found on the Energy Networks website: www.energynetworks.org PLANNED TRANSMISSION DEVELOPMENTS IN THE GREENWICH COUNCIL AREA National Gridâ€™ s Seven Year Statement sets out the proposed enhancements to the electricity transmission network and can be found at the following link: http://www.nationalgrid.com/uk/Electricity/SYS/ There are currently no works proposed in the Greenwich Council area.	

Carmelle	Bell	Thames Water Plc				Policy C1 and Supporting Paragraphs â€“ Infrastructure Thames Water are the statutory water and sewerage undertaker for the Borough. Thames Water do not object to the policy in principle, but consider that it does not adequately cover water and sewerage infrastructure provision. Thames Water consider that a Core Strategy policy (either Policy C1 or a new Policy) should specifically cover the provision of water and sewerage infrastructure which is essential to all development and so as to accord with the London Plan. Policy 4A.18 of The Consolidated London Plan, February 2008, relates specifically to â€œwater and sewerage infrastructureâ€• and states: â€œThe Mayor expects developers and LPAs to work together with water supply and sewerage companies to enable the inspection, repair and replacement of water supply and sewerage infrastructure. Water and wastewater infrastructure requirements should be put in place in tandem with planned growth to avoid adverse environmental impactsâ€¦â€¦â€• Policy 4A.16 of the London Plan relates to water supplies and states: â€œThe Mayor will work in partnership with appropriate agencies within London and adjoining LPAs to protect and conserve water supplies and water resources in order to secure Londonâ€™ s needs in a sustainable manner by supporting the Water Strategy and by.â€• Policy 4A.17 of the London Plan relates to water quality and states: â€œThe Mayor will, and boroughs should, protect and improve water quality to ensure the Blue Ribbon Network is healthy, attractive and offers a valuable series of habitats by: â€¢ ensuring adequate sewerage infrastructure capacity is available for developmentsâ€¦..â€• There are similar policies contained in the draft replacement London Plan. Notwithstanding the preparation of an Infrastructure Delivery Plan, Thames Water consider that the Core Strategy must still include a policy covering the key issue of the provision of water and sewerage infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way we are regulated and plan in 5 year periods (Asset Management Plans or AMPs). Such a policy is required 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. It is also important that the satisfactory provision of water and sewerage infrastructure is covered to meet the test of â€œsoundnessâ€• as set out in PPS 12. In August 2009 The Planning Inspectorate published â€œExamination of Development Plan Documents: Soundness Guidanceâ€• (and a minor revision was published in February 2010). The Guide sets out a series of â€˜key questionsâ€™ that should be convincingly answered which aim to provide a framework for the assessment of soundness of DPDs. The Inspectorate Guide sets out at section 2.10 that PPS12 states that core strategies should be effective and that this includes â€˜Sound infrastructure delivery planningâ€™ . In relation to whether the Core Strategy is effective and therefore â€˜soundâ€™ in relation to infrastructure delivery planning, the most relevant key questions are: â€œKey Questions: - Does the DPD explain how its key policy objectives will be achieved? - Have the infrastructure implications of the strategy/policies clearly been identified? - Are the delivery mechanisms and timescales for implementation of the policies clearly identified? and - Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies? Although the Inspectorate guide does not refer to sources of evidence, paragraph 4.49 of PPS12 acknowledges that â€œThis revised PPS12 presents â€œtests of soundnessâ€• in a different and more simple way based on the fact that the Planning and Compulsory Purchase Act 2004 distinguishes between the legal requirements and the determination of soundness. However the rigour of the examination process remains unchanged and inspectors will be looking for the same quality of evidence and content.â€• Advice on sources of evidence were contained within the 2005 Inspectorate Guide to the process of assessing the soundness of Development Plan Documents which preceded the 2008 guide. Key sources of evidence identified within the 2005 guide included: â€œ Evidence - Of particular significance, will be representations from bodies that consider that the DPD either does or does not have sufficient regard to other relevant strategies for which they are responsibleâ€•. and â€œIf the DPD is a Core Strategy, the following documents, amongst other evidence, may be relevant: â€¦â€¦..infrastructure providersâ€™ investment programmes and strategies; environmental programmes etc.â€• The water companiesâ€™ investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. We are currently in the AMP5 period which runs from 1st April 2010 to 31st March 2015 and does not therefore cover the whole LDF period. AMP6 will cover the period from 1st April 2015 to 31st March 2020, but we have not yet submitted our business plan for this period. As part of our five year business plan review Thames Water advise OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. As a result we base our investment programmes on development plan allocations which form the clearest picture of the shape of the community (as mentioned in PPS12). We require a three to five year lead in time for provision of the extra capacity. Where a complete new water or sewage treatment works is required the lead in time can be between five to ten years. New development may therefore need to be phased to allow the prior completion of the necessary infrastructure. Regarding the funding of water and sewerage infrastructure, it is our understanding that Section 106 Agreements can not be required to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place 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. Water and sewerage undertakers also have	There is policy within the London Plan on water quality and sewerage infrastructure, which does not need to be repeated. Policy IM1 is the main policy intended to deliver infrastructure associated with development. This policy now states that, where possible, infrastructure is provided prior to the completion of development. Policy IM3 details requirements for physical infrastructure in the Borough. This policy now specifically refers to the IDP as providing more detail on infrastructure requirements, within which Thames Water's requirements are detailed. The Thames Tunnel is now specifically referred to in the support text of this policy, given that it is already covered in London Plan policy 5.14. The response from Thames Water on Greenwich's IDP is that, apart from the Thames Tunnel, no major pieces of infrastructure are required at this time within the Borough. Should this position change in the future, the IDP will be updated accordingly.

						limited powers under the water industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions. It is essential that developers demonstrate that adequate 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. Proposed Change To comply with PPS12 and the London Plan either Policy C1 needs to be amended to refer to water and sewerage infrastructure or there should be a new Policy dealing with water and sewerage infrastructure along the lines of: Proposed Addition to Policy C1 or Text for new Water/Waste Water Infrastructure Policy The Council willâ€¦.. â€¢ Take account of the capacity of existing off-site water and sewerage infrastructure and the impact of development proposals on them. Where necessary, the Council will seek improvements to water and/or sewerage infrastructure related and appropriate to the development so that the improvements are completed prior to occupation of the development. The development or expansion of water supply or sewerage/sewage treatment facilities, including sewage sludge, will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised. Ommission of Policy Supporting the Thames Tunnel Project Introduction The Thames Tunnel will intercept two CSOs in Greenwich via a connection tunnel which will run from a preferred site at Kings Stairs Gardens to Greenwich. The CSOs to be intercepted are the Deptford Storm Relief CSO which currently discharges on the foreshore by the AHOY Center in Deptford and the Greenwich Pumping Station CSO which is located within Thames Waterâ€™ s own pumping station. In order to intercept these CSOs Thames Water requires two construction sites within the Borough. Included in our current round of consultation are the preferred and shortlisted sites in the borough which are as follows: Deptford Storm Relief CSO: Preferred sites: â€¢ Borthwick Wharf Foreshore Shortlisted sites: â€¢ The AHOY Centre, junction of Borthwick Street and Deptford green â€¢ Open Space Deptford Green Greenwich Pumping Station CSO: Preferred site: â€¢ Greenwich Pumping Station Shortlisted site: â€¢ Foreshore near Greenwich Foot Tunnel The level of existing overflows of untreated sewage from the Greenwich Pumping Station CSO is the largest individual CSO volume of overflow to be captured by the Thames Tunnel project. The Greenwich Pumping Station CSO spills 51 times in a typical year with an average volume of 8,228,700m3 discharged to the Thames. The Thames Tunnel will substantially reduce the level of overflows of untreated sewage from CSOs forming part of Londonâ€™ s sewers, into the River Thames. The Environment Agency considers that these overflows are causing adverse environmental impacts on fish species, unacceptable aesthetic issues and elevated health risks for recreational users of the Thames Further background and the policy framework which supports the construction of the Thames Tunnel is provided in Appendix 1. Previous Consultation (section 1.3) The inclusion of the key issue of the River Thames as an important asset raised in the previous consultation (9th bullet point in para. 1.3.3) is welcomed. In view of the importance attached to the River Thames it is therefore disappointing to see that the draft Core Strategy does not contain a policy which supports the Thames Tunnel project since this is required to protect and enhance this important asset. Section 1.4 National and Regional Policy Failure to take the Thames Tunnel into account as a major enhancement of existing infrastructure we believe would not meet the PPS12 test for soundness as set out in the Planning Inspectorates revised guidance document â€œLocal Development Frameworks, Examining Development Plan Documents: Soundness Guidanceâ€• (February 2010). In particular the following key questions: â€¢ â€œHave the infrastructure implications of the strategy/policies clearly been identified? â€¢ Are the delivery mechanisms and timescales for implementation of the policies clearly identified? â€¢ Is it clear who is going to deliver the required infrastructure and does the timing of provision complement the timescale of the strategy/policies?â€• Appendix 1 sets out the policy framework which supports the construction of the Thames Tunnel and which should therefore be recognised within the Core Strategy. A specific reference should be made within the Core Strategy to the publication of the draft Waste Water National Policy Statement (NPS) published in November 2010 which includes the Thames Tunnel as Nationally Significant Infrastructure Project (NSIP). As draft national policy the NPS must be part of the evidence base for the proposals in the draft Core Strategy. Annex A of Steve Quartermainâ€™ s letter to Chief Planning Officers (9th November 2009) states â€œlocal planning authorities (LPAs) must therefore have regard to NPSs when preparing their plans at a localand regional level. Emerging policy in a published draft NPS may also be relevantâ€•. In the Department for Communities and Local Governmentâ€™ s letter to Local authorities on 16 July 2009 it is stated that draft NPSs should be treated in the same way as other Government statements of planning policy as material considerations in decisions on planning applications. The letter refers to The Planning System: General Principles (2004) which states â€•emerging policies, in the form of draft policy statements or guidance, can be regarded as material considerations, depending on their contextâ€•. The letter continues to say â€œit may be helpful to clarify that	

						NPSs are not part of the statutory development plan for the purposes of the town and country planning regime, but are statements of national policy on nationally significant infrastructureâ€¦and local planning authorities will therefore need to have regard to NPSs when preparing their plans at regional and local levelâ€• We draw the Councilâ€™ s attention to the recent Inspectorâ€™ s report for the Examination of the Westminster Core Strategy (published on 10 November 2010 ref: PINS/LDF001004) which specifically refers to the inclusion of the Thames Tunnel as a reason for finding this plan met the tests of soundness. The Inspector stated: â€œThames Water seeks to implement the nationally important Thames Tideway Tunnels comprising the Lee Tunnel and the Thames Tunnel, to convey storm sewage which currently flows into the river to the treatment works at Beckton. The Thames Tunnel is likely to pass under Westminster and has support in the London Plan and the DRLP. Thames Water signed a statement of common ground with the Council supporting changes to the plan to add a new Policy CS45 entitled Thames Tunnel, and to amend all references to the â€œThames Tideway Tunnel projectâ€•. I endorse these changes which confirm the Councilâ€™ s support for the scheme and bring the plan into line with national and London Plan policy.â€• Infrastructure (pages 27 & 28); Strategic Objective J; and Critical Infrastructure (paras. 3.2.23-3.2.25) Despite Thames Waterâ€™ s ongoing dialogue with the Borough regarding the Thames Tunnel it is disappointing to see that the draft Core Strategy does not contain any reference or support for the Thames Tunnel project as a major infrastructure project within this section of the draft Core Strategy. Whilst we welcome the inclusion of Strategic Objective J which reads â€œTo ensure that the necessary physical, social and green infrastructure is provided or existing infrastructure is enhanced to support the planned growth and development in the Borough throughout the plan periodâ€•; We do not consider that future infrastructure improvements and the infrastructure implications of the strategy/policies in the draft Core Strategy have clearly been identified in this section. Strategic Polices â€“ 4.8 Infrastructure and Policy C1 Infrastructure It is noted that reference is made to the Infrastructure Delivery Plan (para. 4.8.4) and its purpose to â€œhelp inform the Core Strategyâ€•. The Councilâ€™ s draft Infrastructure Delivery Plan at present fails to recognise the Thames Tunnel. Our separate representations made as part of the consultation on the draft Infrastructure Delivery Plan which demonstrates the need to include the Thames Tunnel as a significant infrastructure project to be delivered during the period of the Core Strategy should therefore be recognised in this section. As set out in our representations to Section 1.4; Infrastructure (pages 27 & 28); Strategic Objective J; and Critical Infrastructure (paras. 3.2.23-3.2.25); and the separate representations to the IDP we consider that: â€¢ Insufficient account has been given in the Core Strategy to the implications for the Thames Tunnel as a major infrastructure project â€¢ The IDP makes no reference to the Thames Tunnel project being delivered by Thames Water within the period of the Core Strategy and no reference is included in the draft Core Strategy. A suggested policy for inclusion in the Core Strategy, which would be in line with policies included in other London boroughs directly affected by the Thames Tunnel including the Westminster Core Strategy, is set out below: Thames Tunnel The council will work with Thames Water and other stakeholders to support the timely implementation of the Thames Tunnel project, including the connection of the combined sewer overflows in the Borough.	
Nigel	Abbott	Cluttons LLP				No comment	

John	Franklin	Greenwich Society				STRATEGIC POLICIES The â€˜spatial portraitâ€™ (section 1.5) states that Greenwich is now the fastest growing borough in London and that its population had grown by 11% since 2001. This growth, mainly on brownfield sites vacated by former industry, has been facilitated by the improvement in the public transport infrastructure which has gradually been put together over the years. It may be that this increase is considered to have already been satisfactorily absorbed because so far development has been piecemeal and gradual, but its impact on the community is noticeable. Para 1.5.17 notes that although the Borough is reasonably well connected by trains and buses to London and Kent they are already overcrowded. The road system in the Greenwich Society area of interest has always been severely limited by the position of the centrepiece of the WHS hard up against a bend in the river Thames allowing only two major through routes crossing east to west. Various attempts to increase capacity on these routes have been made and failed. North-south traffic is also restricted by the river and the Blackwall Tunnel. Other infrastructure shows signs of strain - long waiting lists at the Queen Elizabeth Hospital (the only surviving hospital in Greenwich); many doctorsâ€™ practices no longer accepting new patients; a shortage of places at local schools particularly Nursery schools (para 1.5.16). The planned increase in housing up to 2027 will very much increase these pressures. They cannot be addressed by purely local measures. As para 4.8.4 recognises, physical, green and social infrastructure has to be provided and managed by a wide range of organisations such as TfL, Network Rail, Thames Water and other parts of the public and private sector. Considering that permissions are at present frequently granted for large new developments by Greenwich Council, this is unsatisfactory. What is included and can be done on a local level are measures to reduce the impact of new developments on infrastructure (Policy C1). At present developers are required to supply studies of their immediate area at the planning stage justifying their proposed use of resources. Studies are provided separately for each development, and many developers succeed in obtaining densities and heights which are in excess of the existing master plan for their area. This piecemeal method is no substitute for infrastructure planning to deal with the demanding target that has been set for housing, tourism entertainment and health in the idealised vision set out for 2027. Para 4.8.4 â€œThe Core Strategy will play a key role in securing private sector involvement in infrastructure delivery, and in aligning the programmes of the various providersâ€•. We agree that this should be the role of the Strategy, but as the next sentence makes clear it is in fact left over for the Infrastructure Development Plan which is â€œcurrently being preparedâ€• (with no timescale). Policy C3 Critical Transport Infrastructure and Para 4.8.16: We support the Councilâ€™ s efforts to plan for a new road-based tunnel river crossing (the Silvertown Link) to reduce congestion through the Blackwall Tunnel. We also endorse the Councilâ€™ s support for critical public transport schemes (Policy C3), including improved links along the waterfront between Charlton and the Peninsula, and â€œbetween residential areas in the south of the Borough and employment areas in the northâ€• â€“ but these appear to be vague aspirations with no detail in the Strategy. The financial downturn in the economy since 2008 has brought to a temporary halt a number of large developments which had received planning permission or were in earlier planning stages. This is therefore a good time to consider what has been done to integrate the Councilâ€™ s ambitious plans in this area, and what agencies, public or private, will have to be approached to negotiate a realistic, attainable and affordable future for the Borough. DEVELOPMENT MANAGEMENT POLICIES 5.8.1 We agree that â€œwhere development is planned to take place, it is important for this to integrate with the wider transport and movement priorities of the Councilâ€•. But this is not carried forward in the Strategy, in any attempt to plan these â€œprioritiesâ€• on an area basis; instead it is left to await the Infrastructure Development Plan.	More detail of infrastructure requirements in the Borough is provided in the Infrastructure Delivery Plan, which has been prepared in conjunction with a range of stakeholders. The Infrastructure Delivery Plan is an important piece of evidence that has influenced the Core Strategy, and the key findings from this are reflected in the Core Strategy itself. The IDP will be published alongside the proposed submission version and can be updated when needed in the coming years.
	Waite					This is crucial. Without it, the whole core strategy will fall apart and leave Greenwich residents worse off than before. However, even if infrastructure is delivered, there is a real danger of creating 'ghetto' areas.	Comment noted and it is agreed that infrastructure is crucial.

Andrew	Steeds	Ashburnham Triangle Association				A failure to address the infrastructure needs of new developments By a similar token, in terms of the physical infrastructure, the proposals for the new gyratory system for the traffic in central Greenwich, upon which we will be commenting separately, seem to have been undertaken without due appreciation of their effect on the outlying areas of west Greenwich. The effect of these proposals on the physical, social and green experience of ATA residents wilt be extensive. Again, to use schools as an example of impact, it is hard to envisage parents and children walking to schools â€" as they do nowâ€" when the volume of traffic on the High Road will have increased by as much as seems inevitable from the proposals currently under consideration. In this respect, it is interesting to read, in the Draft Core Strategy document, that our area is currently 'benefiting from ongoing programmes of environmental improvement and housing estate refurbishment.' The choice of the word 'benefiting' is interesting: so far the benefits are less apparent than the potential overburdening on current infrastructure provision. Our experience raises serious questions about the document's confident statements on infrastructure: '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 [...] The Borough's housing capacity and growth locations are determined in large part by the level of infrastructure required to deliver development. Significant infrastructure improvements will need to be delivered that will grow and enhance Greenwich for both new and existing residents as well as visitors.' Neither the ATA nor the residents we represent have noticed much about recent developments that has been 'co-ordinated' or 'timely; nor has it been delivered in a way that enhances Greenwich for existing residents.	More detail of infrastructure requirements in the Borough is provided in the Infrastructure Delivery Plan, which has been prepared in conjunction with a range of stakeholders. The Infrastructure Delivery Plan is an important piece of evidence that has influenced the Core Strategy, and the key findings from this are reflected in the Core Strategy itself to ensure that the appropriate infrastructure is delivered for the growth that is planned. Additional support text has been included under Policy IM1 stating that, 'where possible, infrastructure should be completed prior to the completion of the development'.

	Mayor of London	Greater London Authority				C2 The Core Strategy states that the South East London Technical paper will identify waste sites within the group of boroughs to meet their pooled apportionment. Greenwich should be aware that the GLA does not deem this paper to be in general conformity with the London Plan and that the Boroughs Core Strategy/DPD will need to better identify waste sites for meeting its apportionment requirements. Omission: the Council will need to set out its criteria for determining planning applications whilst waste development plan documents are prepared. This omissions means that the DPD is not in general conformity with the London Plan. Omission: According the GLAâ€™ s latest records of waste sites in London, provided by the EA, the following five operational waste sites are located in the borough and should be included as protected waste sites: - AJL Recycling, End of Life of Vehicles Facility, Coopers Yard, Charlton SE7 - Associated Reclaimed Oils, Physico-Chemical Treatment of Facility, 165 Tunnel Avenue, Greenwich SE10 - Situsec Contractors Ltd, Transfer Station taking non-biodegradeable wastes, 40-45 Herringham Road, Charlton SE7 - Murphys Waste Ltd, Horn Link Way Transfer Station, Greenwich SE10 - Tiffen Land Ltd, Tripcock Point Waste Recycling Facility, Thamesmead SE28 TFL The text suggests that the Cable Car will help reduce congestion at the Blackwall Tunnel. It should be noted however that this is not an objective of the project, which aims to improve links across the River for both pedestrians and cyclists. Given that it wonâ€™ t be used by vehicular traffic, any major reduction in congestion at the Blackwall Tunnel is therefore considered unlikely C4 While TfL is supportive of this policy, it only makes reference to the infrastructure required to promote sustainable transport, and TfL would therefore question whether this policy should also make reference to behavioural change measures such as travel plans and Construction Logistics Plans (CLP), although it is acknowledged that reference to these is made elsewhere in the document. Additionally, while it is acknowledged that reference to car and cycle parking standards is made in the development management policies, TfL would also recommend that a cross reference to these is included within the Core Strategy C3 TfL would question whether the policy should be amended slightly from â€˜support the use of the river for transport purposesâ€™ to â€˜support the use of the river for transport of people and freight â€™ TfL would also recommend removing the word â€˜publicâ€™ in the first sentence of the policy, as the schemes which are listed below it are a mixture of both public and private transport schemes. C(b) TfL considers that the proposed Cable Car will help to improve walking and cycling in the borough, and would therefore recommend that a reference to this is included under this policy. C(c) This policy is supported as being in accordance with London Planâ€™ s car and cycle parking standards, including the provision of electric vehicle charging points. However, in order to avoid ambiguity, TfL suggests that the policy could be reworded from â€˜residential developments must provide a maximum of one car space per unitâ€™ to â€˜residential developments must provide no more than one space per unitâ€™ Omission TfL previously raised a concern that little information on existing and future capacity issues on the strategic road network had been included in the strategy, and this was considered particularly relevant given the existing level of traffic congestion around the town centres within the Borough. Other than a reference to congestion in Greenwich town centre being included, this concern remains. There is also no transport study referenced in the evidence base for the Core Strategy, it is assumed one has been undertaken, and the inclusion of this might help to address some of the potential concerns relating to the highway impact. It is stated in a number of places that an Infrastructure Delivery Plan (IDP) is currently being prepared, and TfL would therefore welcome the opportunity to comment on this once it has been produced; particularly with regard to infrastructure that the borough intend to fund through its own CIL or s106. Other notes It is acknowledged that planning obligations are covered in a separate SPD document, which is to be reviewed in light of the new CIL (community infrastructure levy) regulations and the Mayorâ€™ s proposed CIL, now out for consultation. This is supported, and it is recommended that the borough works closely with both TfL and developers, to ensure that any measures deemed necessary to mitigate the impact of development on the transport network, are able to be delivered through s106/ CIL funding for both services and infrastructure. The document makes a number of references to improving public transport in the â€˜waterfrontâ€™ area. While TfL is supportive of this, and would be open to further discussions on this matter with Greenwich Council, particularly with regards to the Peninsula, it should be noted that only those projects contained within the TfL business plan (2017/18) are currently funded, and therefore any other transport improvements would likely need to be secured through developer funding, or other sources.	Policy 5.17 of the London Plan states that Boroughs may collaborate by pooling their apportionment requirements. Paragraph 5.80 states that Boroughs working collaboratively must demonstrate that their joint apportionment targets will be met, for example, through the preparation of joint waste DPDs, joint evidence papers or bilateral agreements. The principle of the preparation of the Southeast London Boroughs' Joint Waste Apportionment Technical Paper has therefore been deemed to be acceptable. The technical paper, as an evidence base document, is not required to be in general conformity with the London Plan. Policy IM2 safeguards existing waste sites which are considered to be appropriate for waste uses in the long term. Policy 5.17 B, Waste Capacity, of the London Plan sets out criteria against which proposals for waste management should be evaluated. The Core Strategy already cross refers. This is not considered to be a general conformity issue. Each of these sites have been assessed to consider whether they should be safeguarded as existing strategic waste sites: The AJL Recycling site is within the Charlton Riverside Strategic Development Location. It is not considered appropriate to safeguard the site for waste. Associated Reclaimed Oils is within the Greenwich Peninsula West Strategic Development Location. It is not considered appropriate to safeguard the site. The Situsec Contractors site is within the Charlton Riverside Strategic Development Location. It is not considered appropriate to safeguard the site. The Murphys Waste Ltd site is within the protected Aggregates Zone and is considered to be a strategic waste site appropriate for safeguarding in the Core Strategy and including within the Joint Waste Technical Paper. Policy IM2 has been amended to include Murphy's Waste. The Tilfen Land site is currently used for landfill, but will become Tripcock Park, a District Park to serve the Thamesmead Area. Safeguarding the site for waste is therefore not considered to be appropriate. The sentence referring to the cable car has now been amended. Reference to Travel Plans has now been added in para 4.8.25. Policy IM3 (formally C3) has been amended as suggested. Policy IM(c) has been amended to reflect the London Plan and reference to a maximum of one parking space has been deleted. The Infrastructure Delivery Plan will be published alongside the proposed submission version Core Strategy.
Nicolas	Long					N/A	

Caroline	Evans					All the above applies even more strongly to the creation of a coherent local approach over the whole OA7 area for the Green infrastructure referred to in 4.8.3, and the specifics for a properly planned walking and cycling network referred to in 5.8.5, and C (b). The current developments along the Creek and the High Road, approved and now building, have been piecemeal and incoherent. The Core Strategy promises coherence to achieve its goals. The rapid current development of the OA7 area now needs specific planning attention, particularly in building a cohesive new OA7 community along the Creek, to the west of the Town Centre, and in delivering the desired quality of infrastructure.	Although more detailed plan has been considered for this area, there is now limited future development potential on sites that are either undeveloped or do not have planning permission, and it is therefore not felt necessary at this stage. The policies collectively in the Core Strategy will ensure all areas in the borough are enhanced, including Creekside.
Palvinder	Banwatt	Charlton Central Residents Association				4.0 Infrastructure It is good to note that the strategy recognises the importance of effective transport links in Charlton in order to sustain a high density riverside development. We feel that there should be a stronger commitment to enhancing the character and amenities in lower Charlton Church Lane, for example the area would benefit from an improved transport interchange system. Charlton station is already a very busy commuter link and does not have the capacity to cope with increased passenger numbers, particularly during the rush hour. The negative impact of train cancellations on other transport systems servicing the area is already well documented. On such occasions, it is impossible to get on the 472 and 486 buses to North Greenwich in order to access the underground system. The recently opened DLR station at Woolwich Arsenal may help to alleviate the situation but it has yet to be fully tested. The Blackwall Tunnel is unable to cope even with normal rush hour traffic and there can be extensive jams on the main roads in both directions to Greenwich and Woolwich (for the ferry). Frequently the road system is gridlocked, resulting in motorists using residential roads in the CCRA area as rat runs. CCRA is seeking assurances that the Charlton Riverside development will only get approval if there is a firm commitment to improve the local transport infrastructure. Ideally this should be in place before work commences as there will be significant additional works traffic which will have a negative environmental impact in the short to medium term in the Charlton area, particularly on air quality. Childhood asthma, cardiovascular disease and cancer have already been identified as health priorities for the borough. A further deterioration in air quality over the period of this proposal will not help to alleviate these conditions but could lead to a worsening of the situation. In the past eighteen months significant work has been undertaken in the CCRA area to replace water and gas mains pipes, resulting in considerable disruption to residents. Our assessment is that there is poor communication between the utilities companies to co-ordinate the work. This has led to delays in completion, repeated excavation of the roads, poor and hasty resurfacing resulting in cracks and potholes. We would expect LBG to ensure that robust plans are in place that evidence how utilities companies will work effectively together to eliminate delays and minimise disruption to surrounding areas. Moreover stringent monitoring and enforcement policies should be implemented to ensure compliance.	The recently adopted Masterplan SPD for Charlton Riverside will help ensure that infrastructure is planned appropriately and is sufficient to meet the growth planned here. Upgrades to utilities are not usually a planning matter, but where a development requires new utilities infrastructure the developer will need to prepare a Construction Logistics Plan to ensure that there is disruption due to construction is minimised. Air quality is recognised as being important in the Borough and policy E (c) aims to deal with this. Also, additional text has been added in to the support for Policy IM1.
Metropolitan Police Authority		Metropolitan Police Authority	Brian	Coughlan	CGMS Consulting	4.8.3 Infrastructure This section outlines the various types of physical, social and green infrastructure which is required in the borough. The list of social infrastructure does not include policing. This is contrary to London Plan Policy 3A.18 which includes police facilities in the list of social infrastructure and community facilities. It is recommended that the following alteration is made in order to ensure the Core Strategy accords with the overarching policy: â€¢ Social Infrastructure: this includes health facilities, policing facilities, schools, libraries and other community facilities. This is addressed in the 4.7 'Cohesive and Healthy Communities' Chapter of this Core Strategy.	Amendment made and emergency services have now been added to the list of social infrastructure

Clare	Kemsley					I live on Greenwich High Road and feel strongly that there should be appropriate detailed long-term plans for the areaâ€™ s development. In particular, we need a supplementary planning document for the immediate area. I make particular reference to the two strategic objectives of the Draft Core Strategy: * â€˜to protect and enhance Greenwichâ€™ s rich natural and built heritageâ€™ * â€˜to promote high quality architecture and urban design in all developments in Greenwichâ€™ . Itâ€™ s important that Greenwich High Road sees effective implementation of these objectives. A lot of piecemeal development has already happened or been planned, and I donâ€™ t think that it all meets these criteria. However, we should not assume that itâ€™ s too late to implement more appropriate planning. Immediate steps should be taken to make sure any further development is planned and controlled with a supplementary planning document or equivalent neighbourhood plan. The architectural character of the area should be improved (or maintained where appropriate), rather than worsened by development. And it must have a positive impact on the experience of current and future residents. I am keen to continue living on Greenwich High Road and I hope that new developments retain whatâ€™ s good about the area, and make real improvements where necessary. However, we canâ€™ t rely on piecemeal planning to achieve this. I have strong concerns that without appropriate long-term planning, it may deteriorate as a residential area rather than improve. I hope the council is able to ensure that a supplementary planning document is produced for our area.	Although more detailed plan has been considered for this area, there is now limited future development potential on sites that are either undeveloped or do not have planning permission, and it is therefore not felt necessary at this stage.
		Greenwich Peninsula Regeneration Ltd	James	Wickham	Gerald Eve	Policy C3 â€“ Critical Transport Infrastructure The second bullet of this policy refers to the continued safeguarding of land for the Silvertown Link, which will connect the Greenwich Peninsula to Silvertown Quay. This reference should be clarified so that the policy refers specifically to tunnel. This is as per Transport for Londonâ€™ s evidence regarding the future of the Link to the Examination for the Draft Replacement London Plan.	This has been updated to make clearer that the Silvertown Link is a tunnel.
Barbara	Reid					The current developments along the Creek and the High Road have been piecemeal and incoherent. The Core Strategy promises coherence to achieve its goals. A coherent local approach is needed for the whole OA7 area for the Green infrastructure referred to in 4.8.3, and the specifics for a properly planned walking and cycling network referred to in 5.8.5, and C (b).The rapid current development of the OA7 area now needs specific planning attention, particularly in building a cohesive new OA7 community along the Creek, to the west of the Town Centre, and in delivering the desired quality of infrastructure.	Although more detailed plan has been considered for this area, there is now limited future development potential on sites that are either undeveloped or do not have planning permission, and it is therefore not felt necessary at this stage.
Peter	Rice					no comment	
Peter	Luck					See Q18	

		Greenwich Hospital	Neil	Lucas	Drivers Jonas Deloitte	Greenwich Hospital supports Policy C4 which seeks to develop an integrated and sustainable transport system that is extensive in coverage and meets the needs of residents, businesses, workers and visitors in the Borough. The regeneration of Greenwich Market will make a positive contribution towards the development of sustainable transport in the area and has been designed to be accessible by all. Greenwich Hospital supports the promotion of the use of public transport, cycling and walking in the Borough, although request that it is directly consulted with regard to the development of any significant pedestrianisation scheme. Greenwich Hospital broadly supports Policy C1. However, it notes that Policy C1 does not incorporate any intention to reduce the overall demand for additional infrastructure within Greenwich (Option 3 of Core Strategy: Issues and Options document (2008)). Greenwich Hospital considers that taking measures to reduce overall demand would reduce infrastructure implementation costs for both the Council and Developers, which would make a positive contribution towards securing the highest quality development in the Borough.	Policy IM3 aims to reduce the impact of increased demand on the Borough's transport network, by supporting new transport infrastructure in the Borough. Additionally, policy IM4 aims to reduce the impact on the Borough's road network by promoting other forms of transport such as walking, cycling and public transport.
Judith	Cooke	Environment Agency				WELCOME Policy C4 Sustainable Travel especially paragraph 3.	Support welcomed
Judy	Smith	South Greenwich Forum				C2 Waste Apportionment: improvement of business recycling provision requirements. C3 Critical Transport Infrastructure: Greater emphasis on importance of improved north/south public transport, particularly identifying extension of DLR to Kidbrooke, Eltham & New Eltham. C(a) Transport Infrastructure: Consider the strategy should be for a 20 mph borough with only main roads exempted. C(c) Parking Standards: Disagree with a general policy that developments in town centres should be car free if this applies to housing developments, as we have not yet reached a situation where the public generally are prepared to do without a car	Recycling is within the London Plan and therefore not repeated in the Core Strategy in this instance. Reference to consideration of a DLR link to Eltham has now been added to policy IM3. It is important to promote alternative transport modes to the car, where there is good public transport accessibility, to reduce the increasing impact on the road network. Support text to Policy IM(a) has been amended to make it more clear that streets that are primarily residential in nature and not part of the primary through route should feature a 20 mph speed limit.
Lawrence	Smith	Westcombe Society				Policy C1 WS strongly supports the â€˜Reasonable Alternativeâ€™ to Policy C1 (p 135) Infrastructure prior to the completion of development is essential (see answers to questions 4, 6, 9 H1 and H2/3, 10 EA2, 14 E(c)). Policy C3 Refer to answers to question 5. WS also supports links between north and south of the borough. Policy C(d) WS supports this policy but would add that it should include other measures to minimise the disruption and caused by freight e.g. inclusion of appropriate long term measures in design of developments (see question 12 DH1). WS would also like to see provision for distribution/consolidation centres.	It is not considered that it would be viable to require all development to provide all infrastructure prior to development, but where this is possible it should be achieved and this has now been stated in the support text of policy IM1. Policy IM5 now refers to the requirement for Construction Logistics Plans and Delivery & Servicing plans within the London Plan. Policy IM(c) also refers to the need for provision for servicing vehicles where this will be associated with the development.
		London Fire and Emergency Planning Authority	Donald	Messenger	Drivers Jonas Deloitte	Infrastructure Delivery Plan (IDP) The LFB ask to be kept informed of the development of the IDP to ensure sufficient provision is made for current and future LFB service capacity. The LFB wish to highlight that the operational needs of the LFB are in the process of changing and their future aim is to manage capacity at a London wide level. The LFB will keep LB Greenwich informed of any change to future capacity within the borough. Policy C1: Infrastructure The LFB support Policy C1 which relates to Infrastructure and seeks to ensure that all development makes appropriate provision for infrastructure requirements, through use of conditions and planning obligations. The LFB also support paragraph 6.1.27 which states that the Planning Obligations SPD (2008) covers and includes the specific requirements for assessing the provision (and financial contributions) for public safety and emergency services.	Comment noted. No action required.

Philip	Binns	Blackheath Society				Section 4.8 Infrastructure Introductory comment We consider that the various objectives for Critical Transport Infrastructure should be supported and we welcome the fact that there is recognition in the Draft Core Strategy of the demands placed on the existing infrastructure brought about by the anticipated levels of growth in development. Although not confirmed at the time the draft document was in preparation, it would now be relevant to include a reference to the recently approved Cable Car crossing over the River Thames, linking the Greenwich Peninsula with the Royal Victoria Docks in Newham. The Draft Core Strategy does not appear to include any reference to the use of the River Thames for the transportation of waste materials arising from demolitions on development sites close to the river nor to the use of the river to bring new materials on to such sites. The benefits to be gained in this sustainable approach are significant, not least a reduction in lorry movements on the surrounding roads in the Borough, and we believe that this issue should be addressed in the document. Policy C3 Critical Transport Infrastructure We support the aims of improving the use of the River Thames by the public through upgrades of the present Woolwich Ferry service and the introduction of a new ferry service at Gallions Reach. We question whether consideration might be given to new ferry services upstream for example in the Greenwich Peninsula area to complement the Cable Car service planned for this location. We note the aspiration to extend the existing river bus service to Thamesmead. This in our view is problematical given that the river bus service to Woolwich Arsenal only operates at limited times. However, given the proposed intensification of the Charlton Riverside for major redevelopment, it would not be unreasonable to consider the introduction of an additional pier in this location. The intention of providing a direct public transport link between the southern residential parts of the Borough and the employment areas in the north is to be encouraged and the promotion of the Charlton Riverside as an Opportunity Area should help in achieving this objective. Section 5.8 Infrastructure Policy C(a) Transport Infrastructure We welcome the fact that, by setting out the comprehensive range of requirements listed here, the Draft Core Strategy is placing on those promoting major development proposals a responsibility for demonstrating that their plans conform. Policy C(b) Walking and Cycling We note and welcome the aspirations of this policy. Will the Draft Core Strategy include a map of the Cycle Network similar to Map 11-page 147 of the adopted UDP?	Reference to the cable car is included in the support text of policy IM3. Use of the river Thames for transport purposes is referred to in policy IM3, and additionally, policy IM5 deals with the movement of freight by water. Policy IM3 now refers to protecting and enhancing existing piers. A new pier at Charlton Riverside is a possibility set out in the masterplan SPD for this area and comments have been noted regarding the frequency of the river bus service. It is not felt necessary to include a map of the cycle network within the Core Strategy.
A.E.	Hart					4.8.4 The DCS has no provision to extend the Jubilee Line southwards. I think this should be included even as a long term objective to improve north-south transport links. The Jubilee Line was constructed so that it could be extended southwards from North Greenwich. For the same reason I would also like to see a railway station created at Blackheath Royal Standard on the Charlton to Blackheath line, even if it is underground with escalators coming up.	The Council has been undertaking feasibility studies for a light rail extension to the south of the Borough and this is now referred to in the support text of policy IM3. As a shorter term measure, the Council will also review the bus strategy with TfL and stakeholders between the north and south of the Borough. An extension to the Jubilee Line is not proposed.
Laurie	Baker	Eltham Society				The Society supports these Strategic Policies. In Policy C3 we urge the Council to complete the work on the North-South fixed link (DLR) before Submission stage. If this scheme is feasible, it can be included in this policy and can then attract contributions from appropriate developments. The Society does not support a bridge across the Thames at Gallions Reach The Society also supports policies C (a) to (f) but notes that in Parking Standards (C (c)) that car-free or car-capped will only work when there is an extensive (in area and time) CPZ around the development. They cannot be used when there is free parking on surrounding streets.	Reference to the Council undertaking a feasibility study of a light rail link has now been included within the support text of policy IM3. A bridge is felt necessary at Gallions Reach to improve access in this part of the Borough. The requirement for car free/car-capped development to be within CPZs has now been added to policy IM(c)
	Tilfen	Tilfen Land Ltd	Craig	Blatchford	Blue Sky Planning	Policy C1/C3 relates to infrastructure provision, to ensure that all new developments contribute to facilities, including Crossrail. We would suggest that the policy sets out the criteria against which any contribution will be sought as set down in legislation, e.g.: â€¢ It must be directly related to the proposed development â€¢ Be fairly and reasonably related in kind and scale to the proposed development â€¢ Be reasonable in all other respects. In this regard, the circumstances and characteristics of a site and development, including viability issues, should be taken into account.	It is not felt necessary to repeat this national policy in the Core Strategy. The Council's Planning Obligations SPD also provides more detailed information on this.

		Her Majesty's Court Service	Amy	Jones	DPP	Policy C1 Infrastructure To provide continuity within the Core Strategy and Development Management Polices document, our assertions set out above to Policy CH1 should be carried through to HMCS' inclusion in the definition of Social Infrastructure noted in paragraph 4.83. This is particularly relevant in the case of the London Borough of Greenwich, in view of the strategic pattern of growth that can be expected to result in an increase in HMCS' workload. Flexibility is also sought in the policy to enable HMCS to adapt its court estate as required to ensure appropriate service delivery: whether this be for instance through court extension, relocation, additional sites, etc. On this basis we request that the wording of Policy C1 is amended to read as follows: â€œThe Council will seek to ensure, through the use of conditions and planning obligations attached to planning permissions, that all development provides for the infrastructure, facilities, including criminal justice facilities, amenities and other planning benefits that are necessary to support and serve it and to offset any consequential planning loss to the local area in a way that secures the best use of land and a properly planned, well designed and integrated environment.â€• In accordance with the above requested changes to Polices CH1 and C1 we also request that Chapter six of the Core Strategy â€“ Delivering the Core Strategy be amended to reflect the explicit reference to HMCS as a key delivery body.	Criminal justice and community safety facilities have now been included in the list of community facilities. Emergency services have now been added to the list of social infrastructure. It is not felt that the HMCS is a key delivery agency in terms of the growth planned in the Borough
	Berkeley Homes	Berkeley Homes (Urban Developments) Ltd	Bob	McCurry	Barton Willmore	Parking standards Policy C(c) 5.4 The first paragraph in Draft Policy C(c) highlights that non-residential developments should comply with the parking standards in the Draft Replacement London Plan (DRLP) (October 2009). However, the Draft Policy also states that residential developments do not need to comply with the DRLP and should provide a maximum of one space per unit. 5.5 This seems to be an inconsistent approach to applying parking standards and we object to the provision of only one space per residential unit because it does not take account of the mix of residential units proposed in any given development or the level of public transport accessibility. The residential parking standards set out in the DRLP are shown below (see original submission). 5.6 The London Borough of Greenwich is characterised as having number of suburban locations containing family housing and the Core Strategy highlights the need for further family sized housing to be brought forward. 5.7 The DRLP indentifies that there should be different parking standards for different sized residential units, presumably to take account of the number of working adults that could be living in one property. It is fair to say that a 3 bedroom or a 4+ bedroom unit could have an average of 3 working adults living at the property with 2 of those needing access to a car at some stage during the working week. It would therefore be appropriate to provide sufficient space to park more than 1 car in accordance with the DRLP residential parking standards. 5.8 We therefore object to the parking standards set out in Draft Policy C(c) and suggest that the Council relies on the Residential Parking Standards being put forward in the DRLP.	The parking policy for residential development is already applied within the UDP with success. Policies IM4 and IM(c) aims to limit the reliance on the private car and provides other forms of transportation where possible. Residential development around Woolwich Town Centre in particular benefit from very good access to public transportation.
Ken	Hobday	Abbey Wood Wildlife Group				We need to take the transport emphasis within the Borough away from the car and more towards Public Transport, cycling and walking and one way in which this could be positively encouraged is to encourage more local shops, rather than having shopping within the Borough dominated by big supermarkets, which are all too often more than feasible walking distances from where most people live. This encourages car use and it is also bad for the local economy, as the large supermarkets tend to take money out of the local economy, where as smaller shops tend to keep money more local.	Policy TC7 supports the enhancement of local centres and neighbourhood parades which provide a range of local shops and services within walking distance of residential areas

Janet	Goulton	London City Airport Limited				10. LCA does not however support Greenwichâ€™ s aspiration in Policy C3 to develop an additional ferry service between Greenwich and Gallions Reach. We believe that while the Woolwich Ferry provides a useful service for large vehicles and overspill traffic during heavy congestion, slow, low capacity services such as ferry crossings will not provide significant cross river capacity increase to warrant the time and cost of such an exercise. Such a service also encourages heavy truck traffic onto Greenwich and Newham roads which does not start or end its journeys in these boroughs. 18. LCA fully supports Policy C4 to promote sustainable modes of travel to Greenwich residents and would be very happy to share the Airportâ€™ s Travel Plan with Greenwich Council to consider ways in which we might collaborate to increase walking, cycling and DLR access to the Airport. 19. We are grateful for the considered inclusion of Policy C(e) which is directly related to the Airport and have included (attached to this letter) some suggested revisions following changes to the administration of safeguarding. SUGGESTED WORDING FOR POLICY Policy C(e) London City Airport All applications for permission to develop sites within the outer safeguarding boundary, as shown on the safeguarding map for London City airport, will be determined having regard to the advice received from the Civil Aviation Authority. 5.8.21 Although London City Airport lies on the northside of the river, it still has an important impact on those parts of the Borough which are located near it. For reasons of public safety and environmental protection, the development of land in the vicinity of London City airport may be limited and applications for permission for certain types of development should be referred to the Civil Aviation Authority (CAA)Airportâ€™ s Safeguarding Consultee, as required by Circular 01/2003 Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas: The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002. 5.8.22 The CAA has published a map that indicates the outer safeguarding boundary for the airport, also shown below, and the type of development, in terms of building height, that must be referred to them. For pre-application advice on building heights and other safeguarding matters, applicants are advised to contact London City Airportâ€™ s Environment and Planning ManagerSafeguarding Consultee on 020 7646 0200. Map 2: London City Airport safeguarding map (image not to scale) (Popup full image) 5.8.23 The airport also has a designated Public Safety Zone that falls within the outer safeguarding area, as shown on the Proposals Map, where there should be no significant increase in the number of people living, working or congregating. Other restrictions on development may include noise levels, as imposed by the airport operating at capacity. This is likely to restrict the location of certain noise-sensitive uses such as hospitals, schools and dwellings close to the airport.	Policy IM(d) has been updated as suggested. Reference to potential ferry crossing at Gallion's Reach has been removed.

Linda	Hodgson	Heathway Residents Association				Footpaths We welcome the references to footpaths and walking in the Draft Core Strategy and confirmation that cycling and walking will be promoted within the Borough (Policy C4). However, we would argue that the footpaths of Greenwich should be given a higher profile in the Strategy, as follows: 1. The footpaths of Greenwich should be considered as part of Greenwichâ€™ s heritage. The major paths are discussed (the Green Chain Walk/Capital Ring under the heading of Open Spaces, and the Thames Path under Sustainable Travel) but the network of smaller paths get cursory mention. These are just as important and are vulnerable to piecemeal destruction. 2. Short, local footpaths can play an important role in improving the cohesiveness and convenience of local areas. 3. There is abundant evidence of the health benefits, both physical and psychological, of walking. Two practical commitments should go in the Strategy: 1. To produce a legal footpath map ('definitive map') of the footpaths of Greenwich. As an Inner London Borough, Greenwich is exempt from the usually legal requirement put on Councils to maintain such a map. The benefits of this map for the protection of footpaths is enormous, and it could be argued that Greenwich has much more of the characteristics of non-urban areas than most Inner London Boroughs. This would also be protection against the 2026 cut-off date (see below). 2. Maintain adequate staff and resources to fulfil Greenwichâ€™ s legal requirements on the upkeep and signage of footpaths. The (CROW) Act proposes to close the Definitive Map and Statement to the addition of rights of way that were legally in existence before 1949 in 2026. This is often referred to as the '2026 cut-off date' and would have the effect of removing highway rights over any rights of way that existed prior to 1949, if those rights have not been recorded. In order to research the historical documentary evidence for unrecorded rights of way (sometimes called "lost ways") the Countryside Agency (as it then was) put in place a scheme in England called the Discovering Lost Ways project (there was no similar scheme for Wales). In early 2008 Natural England announced that a review of the Discovering Lost Ways project had been concluded and that Natural England recommended to Defra that the project should be abandoned and proposed instead that a 'stakeholder group' be formed to recommend changes to the existing legislation. Defra has accepted this recommendation and has indicated that the 2026 cut-off date will not now be implemented until the stakeholder group has reported. Primary legislation would be required to remove the relevant section of CROW from the statute books and until that has been passed there remains the possibility that the 2026 cutoff date will be implemented. Policy C4 Sustainable Travel p134 Footpaths need to be included here Policy C(b) Walking and Cycling - Footpaths to be included here Policy C(c) Parking Standards p192 5.8.10: We support specifying lower maximum parking standards than in the Draft London Plan.	As stated, those footpaths of particular signficance within the Borough, such as the Green Chain walk, have been specifically identified. For other footpaths, policy IM4 and IM(b) are intended to help protect and enhance these as well as promote additional footpaths where necessary. The health benefits of walking are also referred to in policy CH2. Given the Borough's inner London character, it is felt that that the completion of a Borough-wide assessment of footpaths, given the number of them, would be unduly resource intensive for the benefit it could deliver. Footpaths are referred to in policy IM4 and IM(b)
Anna	Townend	Greenwich Environment Forum				Greenwich has been fortunate in last 25 years, new jubille and DLR routes. Now depends on realisation of Crossrail, river uses, reduction on strett and air pollution - development of 'clean' new/greener objectives being realised locally and nationally and globally. Dynamism must be unleashed.	Comment noted. Agree that transport improvements over the last 25 years has been good for the borough. No change required.
Frank	King					Well I have given my views on the lack of Transport and Roads a long the Northern end of the Borough several times and refer you back to these comments. I have also set out my views on waste management above and refer you back to these proposals in detail. One new observation on my part is the North-South Divide. The best solution that I can think of is the extension of either CrossRail or the DLR from Woolwich via Kidbrooke, Eltham, Mottingham and New Eltham to Bromley. This would solve so many problems, but particularly connecting the four British Rail Lines which would not only mean that the North-South problem would be eased immensely, but it would also save having to go up to London to reach these stations, or indeed to get to the South Coast. Add to this the fact that the North Kent line is very overloaded and that the services to all of the London Terminus stations are better from all of these five Rail Stations are faster and less crowded, it would be much easier to get into London. Money could be saved for this extension if only either CrossRail or DLR went to Abbey Wood, but not both as planned. Policy C4: Footpaths and cycleways: Please consider providing about 10% of the seats and benches along Footpaths set at 22" high for those of us who are disabled with Arthritis and other Back and Lower Body disabilities, as we cannot get up without a lot of help from the basic 17" seating. 5.8. 11.: When new schools are built consideration should be given to any and all measures to stop parents taking their children to school by car. Exclusion zones of half a mile or more should be considered for dropping-off by car. I am sure that the Council are aware that the practice of taking children to school by car should be discouraged for many reasons including: The child's health (encouraging walking); The congestion caused twice a day and the effect that this has on residents living near the school, The danger of accidents with children running out between cars to cross the road to their parent's car and many other anti-social issues of this practice. If there are any ways to prevent taking children to school by car, they should be implemented at the planning stage. I shall deal with Questions 17; 18; 19 & 20 together as they are interlinked: 6.1.5.: There should be no PPI involvement in any Council plans. These Companies take all of the	The Council has been undertaking feasibility studies for a light rail extension to the south of the Borough and this is now referred to in the support text of policy IM3. A policy on the height of benches would be too detailed for a planning policy, but policy IM4 does state that developments should ensure that they take into account the needs of all users, including those with disabilities. It is not felt that exclusion zones around schools would be practicable or reasonable, but other measures are proposed to reduce the use of the private car. It is not considered that it would be viable to require all development to provide all infrastructure prior to development, but where this is possible it should be achieved and this has now been stated in the support text of policy IM1.

						profits and "milk" the development dry without taking any financial risks at all. Plus they have a very bad track record of increasing their management charges after contracts have been exchanged. 6.1. 7.: Our housing list backlog should take priority in all circumstances and provision should be made for GBC to have first call on all of the developments. 6.1.18.: The infrastructure, Roads and Public Transport, MUST PRECEDE the major sections of building. 6.1.20.: The Council should ensure that the North â€“ South Transport Links are established before the other developments, or at least planned and agreed to fit the timescale . 6.1.29.: I really do hope that this sentence is not just window dressing and all of the consultations are considered, even those made by single residents like myself.	

DCS89	Bexley Council	Question 16	Waste Apportionment Policy C2 LLB welcomes LBG's commitment to meet the waste apportionment allocations and safeguarding of the existing waste transfer and management sites in Thamesmead. Para 4.8.13 refers to Policy DHI for guidance regarding provision for waste within developments. Policy DHI in Management Policies only makes reference to Archaeological issues. Suggest that a reference is included to the waste hierarchy as set out in PPS 10. Transport C3 LBB welcomes policy to safeguard land for Cross Rail route and the supports the use of river for transport purposes ie an extended river bus service to Thamesmead.	Para 4.8.14 now refers to the waste hierarchy. All other comments noted.

Question 17 – Delivering the Core Strategy – Do you have any comments on the delivery of the Draft Core Strategy?

	Consultee			**Agent**				
ID	**Given Name**	**Family Name**	**Organisation**	**Given Name**	**Family Name**	**Organisation**	**Delivering the Draft Core Strategy (Refer to section 6) - Question 17: Do you have any comments on the delivery of the Draft Core Strategy?**	**Council response**
DCS18	Irene	Godfrey	Greenwich Wildlife Advisory Group				The policies are excellent but problems occur in their implementation. This needs to be addressed by ensuring that the Council's Core Strategy is made an integral part of the Council's policies through dissemination and training.	Noted. It is certainly important that the Core Strategy is integrated with wider Council policies and that officers are trained in its application.
DCS21	Carmelle	Bell	Thames Water Plc				Page 210 - Monitoring New indicators should be added which state: 'Number of planning applications approved against Thames Water's advise on water/sewerage infrastructure capacity grounds' and 'Number of planning application's granted contrary to Thames Water's advise on Pluvial flooding'.	The Council would consider including this in future monitoring reports. May need assistance from Thames Water in supplying the information.

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Organisation**	**Given Name**	**Family Name**	**Organisation**	**Delivering the Draft Core Strategy (Refer to section 6) - Question 17: Do you have any comments on the delivery of the Draft Core Strategy?**	**Council response**
DCS22			Novalong Limited	Richard	Jones	Planning Perspectives LLP	Paragraph 6.1.10 notes that the Council will work closely with housing developers and landowners. This is sensible but the Council must also take notice of what those parties say and therefore the sentence should be extended to include the words: 'â€¦ and will apply its policies of the Core Strategy to respond to those parties' advice and requirements'. It is also noted that at Paragraph 6.1.2 reference is made to the Borough's Strategic Development Locations delivering 90% of the supply. This demonstrates how many housing eggs the Council has in one basket and supports the approach set out in these representations that Core Strategy needs to respond more positively to opportunities for residential development in the south of the Borough, including on open space of no strategic importance and from which the public reap little benefit. More widely, and of critical importance, it is considered that the Core Strategy policies on Housing are so demanding that they will impede residential development to the extent that the Council's overall housing delivery strategy will not be achieved. Taken together, the Core Strategy's polices on brownfield site development, affordable housing and housing design and the need for new physical and social infrastructure, will so challenge the viability of housing development that it simply will not take place. This will apply particularly to the complex sites in the north of the Borough. This reinforces the case for an approach that encourages the development of potentially more straightforward appropriate site throughout the Borough rather than just in the north.	Noted - The Council already has in place planning permissions for approximately 70% of the London Plan target, none of which is on Metropolitan Open Land or Community Open Space. While all planning applications are determined on a case by case basis, it is not considered necessary or desirable to build on the Borough's open spaces.
DCS24	John	Franklin	Greenwich Society				6.1 Implementation The Society's main concern on implementation â€" that infrastructure should be planned alongside housing developments for a whole area so that the two aspects can be implemented together, rather than negotiating infrastructure as a piecemeal afterthought (6.1.18) â€" is set out in the introduction. There are two other comments on this section of the Strategy: Para 6.1.10: We note that a key priority is to establish a Strategic Housing Partnership which will 'bring together key providers and partners for housing investment and delivery'. No doubt it is useful to keep developers informed of opportunities and to share information and views â€" but if it brings together competitors it would not be possible to allocate development opportunities or provide commercially confidential information on current negotiations. There would appear to be a risk that this could be an excuse for the Council's planning department to take a limited, reactive role. The strategy should make clear that the Council will take the central responsibility for progressing development opportunities and ensuring effective competition among developers to build high-quality schemes with minimum delay. Para 6.1.13: We are concerned that the strategy merely says that 'further guidance on how development of these urban quarters will be progressed' is to be provided through 'either Area Action Plans or Opportunity Area Planning Frameworks'. This looks all too likely to be a recipe for further paperwork and delay; no doubt there is a need for further detailed local guidance, but the strategy should indicate a timetable or at least a determination to make early progress. There are also two important omissions from this section: Consultation: Para 6.1.28: Under Policy 4.7, Cohesive and Healthy Communities', para. 4.7.4 says that 'in order to successfully implement this policy and achieve improved community cohesiveness within the Borough, the Council will work with the Greenwich Partnership and other partners to ensure that the policy is achieved'. Proper consultation is vital to successful implementation â€" for	Disagree that infrastructure is negotiated for as a 'piecemeal afterthought'. However, it is agreed that infrastructure should be planned alongside housing developments. It is certainly important that any additional housing has an appropriate level of infrastructure accompanying it and the Infrastructure Delivery Plan is being prepared to help ensure this. Additional wording has been added to the support text of Policy IM1 seeking wherever possible for infrastructure to be delivered prior to a development being completed. Agree that proper consultation is key to successful policy implementation.

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Organisation**	**Given Name**	**Family Name**	**Organisation**	**Delivering the Draft Core Strategy (Refer to section 6) - Question 17: Do you have any comments on the delivery of the Draft Core Strategy?**	**Council response**
							example CH1.iv 'supporting the development of new and improved community facilities where there are identified needs' â€“ identified by whom? The Borough, and hence the Greenwich Partnership, are clearly too wide to achieve adequate consultation with a 'cohesive community'. The Government is introducing a new 'localism' Bill with an emphasis on 'neighbourhood groups'. The Strategy needs to take account of this, beyond a bare reference to the Borough's Statement of Community Involvement. A number of Places of Greenwich / Locations for Strategic Development (section 2.2) in which Greenwich Riverside is one, are identified in the Strategy, but there is no discussion of machinery for consulting these more 'cohesive' communities, or smaller-scale neighbourhood groups within them (as in the present Management Agencies). This is an important omission which we consider needs to be covered before the next round of consultation. Para 6.1.289: We need to see the Statement of Community Involvement, but with regard to matters of architecture and design, consultation should involve local amenity groups which can bring to bear the views of experts (architects and planners) who take an interest both professionally and because they are local residents. Resources: We consider that this is an important matter that should be treated in a new, separate, section, to fit in, perhaps, before the section on â€˜Consultation'. One obvious key point is that the strategy will not be successfully implemented unless it is properly resourced and the Council's planning department is fully staffed with effective officers, with the confidence to make it happen. This may seem too obvious to need saying, but at a time when the Council is under financial pressure to make staffing cuts we feel this should be explicitly stated and a section on â€˜Resources' included within the document. The question is how the Council will manage to secure delivery of such an ambitious range of objectives across so much new development and such a large area of protected sites and buildings. What is set out is an extremely exacting task, undertaken at a time when Council resources are expected to be shrinking. We do not think that the appropriate response would be to cut standards of infrastructure provision or design. Rather we would suggest that the pace of development may need to be modified and/or new sources of skills and manpower sought to supplement what the Council and other official bodies can provide. The Government's localism agenda may be relevant here, for example by encouraging devolution of some tasks, such as the management of conservation areas, to local groups.	
DCS25		Waite					It requires: money, money, money (no signs of this in 2011), a seismic shift in attitudes, a Council which is a) responsive and b) efficient. There is a very long way to go!	Noted
DCS32	Nicolas	Long					I support the ATA's request for a SPD for our area	Noted

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Organisation**	**Given Name**	**Family Name**	**Organisation**	**Delivering the Draft Core Strategy (Refer to section 6) - Question 17: Do you have any comments on the delivery of the Draft Core Strategy?**	**Council response**
DCS33	Caroline	Evans					So far, Greenwich has not communicated how it proposes to meet the planning obligations which current and planned development of this part of West Greenwich have already given rise to. Nor does the Draft Core Strategy give any indication that this lack will be met in the future. There is now an urgent need to replace the current haphazard and piecemeal approach to the development of this extreme western edge of the Borough with a Supplementary Planning Document. An SPD will enable Greenwich to consult with its own residents and with Lewisham in setting out a coherent approach both to new housing developments, and to their merging with existing residential areas in a newly cohesive, healthy, and properly planned and resourced Creekside/Opportunity Area 7/Greenwich High Road neighbourhood community, to the west of Greenwich Town Centre. This is the basic minimum if Greenwich is to live up to the planning obligations described in the London Plan, and in the Core Strategy. We believe the lack of any commitment to some kind of neighbourhood plan in the Core Strategy will mean that none of the potential of Opportunity Area 7 is realised. If both new and old residents of this part of Greenwich are to avoid continued uncertainty and declining amenities, we urge that the Core Strategy includes a commitment to developing an SPD for this area.	Noted - The majority of the development in the Creekside area already has the benefit of planning permission including s106 planning obligations. To prepare a SPD would not represent the best use of available resources.
DCS42			Greenwich Peninsula Regeneration Ltd	James	Wickham	Gerald Eve	As we have sought to demonstrate throughout these comments, delivery of the scale of development in the Borough envisaged by the Core Strategy and the London Plan is a significant challenge and by no means guaranteed. A key aim of the Core Strategy should be to provide as much positive encouragement and support for tangible delivery as is possible. To this end, the delivery section should be closely integrated with the rest of the Core Strategy as the approach the Council takes to delivery will be a key factor in whether the Core Strategy is 'effective' â€“ one of the three key tests of soundness which encompasses a clear definition of priorities and the need for a realistic timescale. We are seriously concerned that Chapter 6, Delivery, appears to form little more than an afterthought. Firstly, it is uncomfortably separated from the Core Strategy to which it should very clearly relate. Rather than being separated by the Development Management Policies we consider that the Delivery chapter should be included within the Core Strategy section so that it is clear that the Council intends to positively support, encourage and drive the delivery of the Core Strategy vision. Secondly, Paragraph 6.1.8 acknowledges that the Infrastructure Delivery Plan has still yet to be completed. It is essential that this key document is completed in parallel with the Core Strategy if discussion about delivery is to have any meaning. Thirdly, the Delivery chapter is little more than a factual narrative of the existing agencies at work in the Borough. It recognises the important role that the Council has to play, however it does not indicate actually how the Council will act in this role. For example, paragraph 6.1.3 states: 'The successful implementation of the Core Strategy is dependent on the commitment and joint working of the Council, its strategic partners, other public sector agencies, the private sector and community and voluntary organisations.' This is merely a statement of fact. It contains no direction or policy. It should go on to say that the Council will work closely, supportively and flexibly with developers and other stakeholders to bring about the rapid delivery that is necessary. Overall, the Delivery chapter should be properly integrated with the rest of the Core Strategy and leave the reader in no doubt that the rapid and effective delivery of the quantum and scale of	Agreed to add an additional sentence to the end of paragraph 6.1.3 (moved since draft to section 3.5.3). 'The Council will work closely with all of its partners to fully deliver the level of growth and enhancement proposed in the Core Strategy for the next 15 years.

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Organisation**	**Given Name**	**Family Name**	**Organisation**	**Delivering the Draft Core Strategy (Refer to section 6) - Question 17: Do you have any comments on the delivery of the Draft Core Strategy?**	**Council response**
							development envisaged is the Council's overriding priority and that it will work constructively with developers to actively support this.	
DCS43	Barbara	Reid					A Supplementary Planning Document is needed for the extreme western edge of the borough to stop the haphazard and piecemeal approach to development here. Greenwich has not communicated how it proposes to meet the planning obligations which current and planned development of this part of West Greenwich have already given rise to. An SPD will enable Greenwich to consult with its own residents and with Lewisham in setting out a coherent approach both to new housing developments, and to their merging with existing residential areas in a newly cohesive, healthy, and properly planned and resourced Creekside/Opportunity Area /Greenwich High Road neighbourhood community, to the west of Greenwich Town Centre. This is the basic minimum if Greenwich is to live up to the planning obligations described in the London Plan, and in the Core Strategy. The lack of any commitment to some kind of neighbourhood plan in the Core Strategy will mean that none of the potential of Opportunity Area 7 is realised. If both new and old residents of this part of Greenwich are to avoid continued uncertainty and declining amenities, the Core Strategy needs to include a commitment to developing an SPD for this area.	Noted - The majority of the development in the Creekside area already has the benefit of planning permission including s106 planning obligations which are in place to ensure that necessary infrastructure associated with a scheme is implemented. To prepare a SPD would not represent the best use of available resources.
DCS45	Peter	Rice					6.1.20 - transport infrastructure is the key to economic success of the town centres, traffic jams/ excessive journey times cause people to use different centres for employment and shopping.	Noted and it is agreed that transport infrastructure is linked to economic success.
DCS57	Judith	Cooke	Environment Agency				Regarding Monitoring Indicators for DH1, E2 and OS(h)... We suggest that other suitable indicators could be: â€¢ Number of planning applications proposing SuDS â€¢ Area of living roofs proposed We suggest that another suitable indicator could be number of planning applications proposing SuDS We suggest that another indicator could be length of river restored.	Comments noted and these indicators will be considered for future versions of the monitoring reports.
DCS77	Geoffrey	Belcher	Maritime Greenwich World Heritage Site				6.1.8 Greenwich Waterfront Regeneration Agency (GWRA) Although this agency is stated as a â€˜key delivery agency' it is understood that it is being wound up. The Council has also terminated the post of World Heritage Site Coordinator from its staff. There is consequently concern about the effect these losses will have on the implementation of Core Strategy policies.	Noted - reference to Greenwich Waterfront Regeneration Agency has been removed

	Consultee			Agent				
ID	**Given Name**	**Family Name**	**Organisation**	**Given Name**	**Family Name**	**Organisation**	**Delivering the Draft Core Strategy (Refer to section 6) - Question 17: Do you have any comments on the delivery of the Draft Core Strategy?**	**Council response**
DCS81	Linda	Hodgson	Heathway Residents Association				Monitoring Framework p213 what quality indicators for localism? numbers of inappropriate development and demolitions refused? - Rather than looking at basement extensions on just a piecemeal basis, we need to implement measures to monitor and control their cumulative impact (e.g. drainage, water table, subsidence)	Noted – the Council has the ability to revise its monitoring indicators over the years to enable it to get the best possible understanding of the impacts and effectiveness of its planning policies. As
DCS84	Anna	Townend	Greenwich Environment Forum				Please continue dialogue on this until the resulting Core Strategy goes to inquiry.	Noted – the Council has the ability to revise its monitoring indicators over the years to enable it to get the best possible understanding of the impacts and effectiveness of its planning policies.

Question 18 Any Other Comments

ID	Given Name	Family Name	Company / Organisation	Agent Given Name	Agent Family Name	Agent Company / Organisation	Any other comments - Question 18: Do you have any other comments on the Draft Core Strategy?	Council Response - Council response
DC S2	Rachael	Bust	Planning and Local Authority Liaison Department, The Coal Authority				Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.	No action required

DC S3			Barclays Bank Plc	Michael	Fearn	Shire Consulting	1. Introduction We act as planning consultants for Barclays Bank plc (â€œThe Bankâ€) in respect of the emerging LDF for Greenwich. The Bank responded to the consultation on the Issues & Options for the Boroughâ€™s Core Strategy in March 2008. In those representations we urged the Council to consider the important contribution that A2 uses such as the Bank make to such vitality and viability and to ensure that retail policies in the LDF are based upon up to date evidence. The Bank is a significant stakeholder within the Borough, being long-established, and has made a substantial contribution to the vitality and viability of Greenwichâ€™s centres over many years. To succeed, town centres need to provide a full range of services and these often need to be located in ground floor premises in accessible locations. The alternative to diversity can be long-term vacancy and decline. Banks are important contributors to town centres and significant attractors of visitation and this important role in underpinning town centres and assisting in regeneration should be recognised in all policies in the LDF on the matter of promoting town centre vitality and viability. Although there are no firm proposals as yet, it is likely that the Bankâ€™s representation within the Borough will need to change over the life of the emerging LDF. The Bank is in a process of evolution, having merged with Woolwich plc some years ago and it now finds that it has a fragmented or duplicated presence in many towns. In view of the likely requirement for improved provision of banking services the Bank would like to confirm its interest in the forthcoming plan process so that its views are heard and emerging policy can take its future business needs into account. The Bank is also concerned that development plan policies should not fetter the important contribution that it makes to the vitality and viability of town centres and that its representation should be allowed to evolve alongside the improvements to shopping provision envisaged over the life of the LDF. On behalf of the Bank we have examined the current consultation document, together with a number of background documents, such as Government policy. We set out our comments below. 2. Points Arising from the Consultation Documents a. General Comments Firstly, the current document is overly long and is in a similar form to the Unitary Development Plan, when the LDF process is expressly intended to move away from that format. Attention is drawn to the Government policy in PPS12, specifically concerning Core Strategies, where it is stated at paragraph 4.1 that the document should focus â€œon the key issues to be addressedâ€. Paragraph 4.5 of PPS12 continues â€œit is essential that the core strategy makes clear spatial choices about where development should go in broad termsâ€¦â€¦it also means that decisions on planning applications can be given a clear steer immediatelyâ€. It is highly questionable that a document which amounts to 237 pages conforms to this advice. It must also be remembered that the London-wide level is already covered by the Mayorâ€™s Spatial Development Strategy (â€œThe London Planâ€) a lengthy document in itself and so much of the strategic work has been done and does not need to be repeated. Local Development Plan Documents should be succinct and sharply focussed upon delivery and necessary infrastructure relating to the Borough itself, whereas there are a number of policies which are overly concerned with minor detail that could just as easily be best dealt with under Supplementary Planning Documentation (see for instance DH(e) on advertisements). Some of the unnecessary length can be attributed to the formulation of anodyne policy statements that merely repeat Government policy (see for instance Policy DH3 on page 98), which is something that PPS12 expressly warns against. Furthermore, some of the draft Development Management policies are inoperable, see for instance Policy EA(c) which seeks to prevent the change of use from â€œpubs that have a significant community roleâ€. Notwithstanding the difficulty in defining for the purposes of development control at what point a pub plays any â€˜communityâ€™ role, let alone a â€˜significantâ€™ one, there are a great many Part A uses (including Use Classes A1-3, or Class A4 non-community drinking establishments) to which a â€˜community pubâ€™ may be put without needing planning permission. Policy C1 concerns â€˜planning obligationsâ€™, requiring benefits to off-set any â€˜lossesâ€™ to the local area associated with new development. New investment should be seen as a benefit in itself and the number of cases involving loss to the local area will be small. Care must be taken not to promote policies that require planning obligations as a matter of routine as this may serve to discourage investment. b. (SEE COMMENTS UNDER QUESTION 11- TOWN CENTRES) 3. Closing Comments The Council recognises the urgent need for significant private sector investment in the Boroughâ€™s town centres so the opportunity provided by the preparation of the main elements of the LDF should be used to give greater encouragement to appropriate Part A uses to invest and to improve the quality of their representation. The Bankâ€™s evidence of how it increases vitality and viability in primary frontages shows that there is considerable benefit in seeking to attract those A2 users such as banks who provide a high level of investment in and maintenance of their premises, resulting in active and attractive street frontages. This will foster very significant footfall and pedestrian activity and attract investment by others, helping to provide the confidence and commercial viability necessary for any programme of regeneration and investment. Pursuing restrictive policies to keep significant generators of footfall out of primary shopping areas will actively work against the achievement of the Councilâ€™s strategic objectives and is inconsistent	National planning policy and development plan regulations do not preclude the combination of Core Strategy and Development Management Policies. Repetition of national and regional policy is avoided; policies reflect local circumstances. Comments on Policy EA(c) Pubs are noted. No change is required to policy TC(a) The Retail Capacity Study 2008 has been published as part of the evidence base of

							with national policy. In fact there is nothing in Government policy that recommends or supports imposing constraints upon acceptable town centre uses at all. Any continuation of historic primary frontage policy is unjustified by robust and credible evidence and the Council has provided no explanation for the decisions it has taken about the most appropriate strategy to follow when considered against the reasonable alternatives. As part of the LDF process, it will be important that any options for draft retail policies in the emerging DPDs are rigorously assessed (see Government policy in PPS12), for example on the basis of an up-to-date retail assessment. Clearly policy that fails the tests of PPS12 will not be judged as being â€œsoundâ€ at time of its public examination. The Councilâ€™s documents show no indication that it has gone through an objective process and audit trail of assessing alternatives, or indeed that alternatives have seriously been considered.	the Core Strategy.
DC S9	Paul	Webbewood					Although I have chosen not to use the questionnaire, I think it is perfectly reasonable to provide it. However I find the questions on the last page rather ill-judged and one in particular to be prurient and offensive. There may be some value in ascertaining the age, gender and ethnic origin of respondents. However, I think it would be better practice (and save space) if people were invited to self-assess their ethnicity rahter than be presented with a long list of boxes. I don't see the need to ask the quesion about religion, especially when there are no questions about things which are probably more significant, such as household income or type of housing tenure. I am also rather surprised by the order in which the various religions are listed, I hope there is no intention to belittle Christianity here. A person's sexual orientation should almost always be a private matter. There is absolutely no justification for the presence of question 25 and I hope that an elected member will make a public apology for including it.	This is a standard question for monitoring purposes. Completion is not mandatory. No change to the Core Strategy is required.
DC S10			CIS Ltd	Thomas	Hatch	Capita Symonds	No other comments	No action required.

DC S13	David	Kerr					The below comments were included in response to the consultation on the conservation area appraisals... The draft core strategy will be weaker than the UDP. The strong wording of the UDP policy D16 is to be weakened. Policy D8 on trees disappears. The strong policies on Listed Buildings are dropped in favour of the weaker less specific wording in PPS5. Control in Conservation Areas is to be provided by Management Strategies, which contain no policies, only recommendations. Policies, planning criteria and design guidance are to await SPDs. As far as I can tell you are not resourced to produce SPDs and as far as I am aware these and Article 4 Directions have yet to be prepared for the Conservation Area Management Strategies produced in 2007. I do not understand how the situation, as summarised in this paragraph, will not lead to weakening of control. Please help me to understand why I am wrong. As I said to the Greenwich Area Planning Committee, it is understandable that SPDs cannot be produced urgently 'due to other priorities.' That being the case, why is it not possible to bridge the gap until SPDs can be produce by incorporating a completr list of relevant policies and a list of planning criteria in the draft documents? As I said on 13 January this would not be expensive and no new work would be required. All that is needed is for the relevant paged from the approved Eltham Palace management strategy to be scanned into the draft documents.	Policy OS(f) protects trees on development sites. Policy DH(i) has been included to cover Statutory Listed Buildings. The timetable for the preparation of a Conservation Area Appraisal is not a matter for the Core Strategy.
DC S14	Terry	Powley	Greenwich Parks Forum				The Greenwich Parks Forum (a network of 23 Friends of Parks groups in the Borough, working closely with the Council to conserve and develop the Borough's much valued parks and open spaces as well-used public amenities) welcomes the Greenwich darft core strategy. It outlines a clear vision for the future and affirms the vital links between development management policies and policies of community cohesion, public health and wellbeing.	Support noted.
DC S18	Irene	Godfrey	Greenwich Wildlife Advisory Group				Strengthen policies on hard surfaces and on light pollution (regarding effects on flooding and wildlife).	It is considered that these issues are adequately addressed. Further detail can be provided in the forthcoming Greener Greenwich SPD.
DC S19			Morden College Trust	Andrew	Sack	Gerald Eve on behalf of Morden College Trust	Spatial Strategy Team London Borough of Greenwich 5th Floor, Crown Buildings 48 Woolwich New Road London SE18 6HQ 01 February 2011 Our ref: NTH/ASA/AXG/G3321 Your ref: Dear Sir MORDEN COLLEGE We write on behalf of our client Morden College Trust in order to submit representations to the draft Core Strategy with Development Management Policies. In addition, we also submit representations in respect of the draft Core Strategy Proposals Map. Morden College Morden 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. Draft Core Strategy with Development Management Policies The key tests of â€˜soundnessâ€™ are that a Core Strategy should be justified, effective and consistent with national policy. PPS12 states that: â€œEffective means that the document must be: â€¢ Deliverable; â€¢ Flexible; â€¢ Able to be monitored.â€ Paragraph 4.46 of PPS12 states that a strategy is unlikely to be effective if it cannot deal with change in circumstances. Core Strategies should look over a long time frame â€“ 15 years usually but more if necessary. The guidance states that in the arena of the built and natural environment, many issues may change over time and plans need to demonstrate how they will handle contingencies. Specifically, the Core Strategy should show what alternative strategies have been prepared to handle uncertainty and what would trigger a use. Policy EA3 â€“ Greenwich Peninsula West Having regard to this guidance, we specifically comment with regard to Greenwich Peninsula West Strategic Development Location, a significant proportion of which comprises land owned by Morden College. Draft Policy EA3 provides guidance for how this area is intended to come forward as a new urban quarter. We welcome the Councilâ€™s ambitions for a mixed use approach to this area but, as currently worded, the range of uses identified in the policy is limited to residential, leisure and commercial uses. As part of a genuine mixed use scheme, there may be opportunities for a wider range of uses including employment, retail and other support services. In this context we would suggest the policy is amended to create greater flexibility to allow for change in circumstances in accordance with PPS12. The suggested re-wording would be as follows: â€œA	Section 3.4 concerns contingencies for uncertain aspects of the spatial strategy. The Greenwich Peninsula West Strategic Development Location has been expanded to include Victoria Deep Water Terminal. Policy EA(3) refers to a range of uses such as commercial and residential. It does not preclude other uses. Reference is made to the Greenwich Peninsula West masterplan SPD which provides further detail.

							newer urban quarter will be created at Greenwich Peninsula West as shown on the proposals map as a strategic development location. This will include residential as well as a range of other uses including leisure, commercial, retail, employment and other supporting service usesâ€¦.â€ As a result of this change, it would then be necessary to amend paragraph 3.3.21 to expand the range of uses identified consistent with the policy. Our suggested amendment to the first sentence of this paragraph is as follows: â€œThis area on the western side of the peninsula is proposed to evolve into a new high quality urban quarter comprising a cruise liner terminal and associated leisure, hotel, retail, employment and enterprise space in addition to new housing.â€ Notwithstanding these proposed amendments, we support the identification of the land identified in Map 2 within the draft Core Strategy Proposals Map â€“ Proposed Changes, as being appropriate for designation as a new urban quarter. Policy EA4 â€“ Strategic Industrial Locations Immediately north of the proposed Greenwich Peninsula West Strategic Development Location, the draft Core Strategy Proposals Map â€“ Proposed Changes identifies a parcel of land on Map 4 as part of the Greenwich Peninsula West Strategic Industrial Location. Once again, the majority of the land identified in this allocation is owned by Morden College. With reference again to the guidance contained in PPS12 and the need for flexibility when considering site allocations, we object to the inclusion of the site within this strategic industrial location. Policy EA4 seeks to protect the area for continued industrial use. It is our opinion that in the context of a declining industrial sector throughout the UK, the viability of maintaining industrial uses in this location is uncertain. It is notable that paragraph 4.2.10 identifies that the area shows little sign of growth and indeed there has been a gradual decrease in industrial activity. In the experience of Morden College, this is likely to continue and therefore an approach to consolidation needs to be established. It is therefore suggested that this area should be promoted for a range of uses which would deliver employment but not necessarily restricted to the traditional industrial use classifications. It is therefore suggested that the following text is included at the end of Policy EA4 as follows: â€œWhere it can be demonstrated that a site is no longer viable for its existing use, and there is clear evidence that there is no demand for this continued use or for industrial purposes (B2) the Council will consider other non-employment uses where it can be demonstrated that they will result in employment activity that contributes to the new urban quarter at Greenwich Peninsula West.â€ 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 Core Strategies preparation at the earliest opportunity. Should you have any questions in the meantime, please do not hesitate to contact Neil Henderson of this office. Yours faithfully Gerald Eve LLP nhenderson@geraldeve.com	The Strategic Industrial Location for Greenwich Peninsula has been expanded and designated an Industrial Business Park following consultation with the GLA. Reference is made to the masterplan SPD which provides more information.
DC S23	Nigel	Abbott	Cluttons LLP				No comment	No action required
DC S25		Waite					a) The documents are repetitive, over-reliant on jargon; neglectful of correct grammar and punctuation b) The needs of the young over-ride those of an ageing population c) Charlton (other than 'riverside') barely exists, yet is in need of support	Comment noted.
DC S27	Peter	Pledger	South London Business				I have read your strategy and I believe you and your colleagues have done an excellent job in attempting to support business development and maximising the assets of the borough. South London Business would be delighted to continue to work with you to help generate business in the borough and jobs with training for the local community. I trust your strategy receives the support it deserves. South London Business is happy to endorse it.	Support noted.
DC S28	Andrew	Steeds	Ashburnham Triangle Association				The need for a supplementary planning document (SPD) In our area, developments are too far advanced for local residents or the ATA to influence their shape and character. But, even at a time when developments were at the stage of proposals, our feeling was that the opinions and the advice of the ATA, made in a spirit of co-operation and an attempt to engage positively with plans and planners, appeared routinely to have been disregarded. We hope this will not be the case for residents in other parts of the borough; as those who will be living in the areas that are being developed, it will be particularly galling if residents' opinions are not given serious consideration. If the current and future development of this area is to proceed in a way that will have an eventually positive effect on the community, we desperately need an SPD, or some other appropriate neighbourhood plan, to guide planning decisions. This SPD would have a specific focus on Deptford Creek, Riverside, Norman Road, Greenwich High Road and the south-eastern corner of the Ashburnham Triangle Conservation Area. Such an SPD would provide the coherence to planning initiatives that is sought in your	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

							core draft strategy and would ensure that developments in the area of Greenwich to the west of the town centre were considered in line with the planning obligations described in the London Plan. An SPD would also be able, specifically, to: â€¢ plan a way of merging the current new building (accommodating approximately 8,000 people) with the existing communities of the area (including the Haddo Estate and the Ashburnham Triangle) in relation to its infrastructure â€"this is a major challenge â€¢ provide coherent context for the significant number of planning decisions that are still to be made along the eastern side of Creekside/Norman Road, Greenwich High Road, the south-west corner of the Ashburnhann Triangle Conservation Area â€¢ ensure objectives identified in the London Plan concerning Opportunity Area 7 and the creation of a cultural hub or node are taken forward â€¢ offer an opportunity to work in partnership with Lewisham to deliver the three points above, which, given that ON includes the western side of the Creek and that this is part of Lewisham, would seem to be vital In this vein, we would like to put ourselves forwards as key people to consult on such an SPD and on other proposed developments in the area, especiallythose in Creekside, which the document has rightly identified as tan emerging node for cultural and creative industries'. This process would seem to be in keeping with the spirit of co-operation on which the strategy document is apparently based, and we look forward to engaging positively with your team on all future developments.	
DC S29		Mayor of London	Greater London Authority				FROM MAYOR'S COVERING LETTER On 2 February 2011 I considered a report on this matter, reference PDU/LDF11/LDD04/. This report together with the attached appendices constitute my formal representations to the pre- submission consultation. Please note that this includes representations relating to general conformity with the London Plan as well as other representations to clarify or improve policy. Representations relating to general conformity have been highlighted in bold for ease of reference. As you will be aware, all development plan documents must be in general conformity with the London Plan under section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004. However, it is my opinion that the submission document is not in general conformity with my London Plan in respect of the following matter: â€¢Housing, Strategic Industrial Land (SIL) and safeguarded wharves: The proposals to de-designate SIL at Charlton Riverside and Greenwich Peninsula West, in close proximity to safeguarded wharves, for housing development are not in general conformity with the London Plan. â€¢Waste: The DPD should set out criteria for determining planning applications whilst waste development plan documents are prepared. The proposal to produce Area Action Plans/Opportunity Area Planning Frameworks for Charlton Riverside and Greenwich Peninsula West are welcomed and the GLA would welcome working in partnership with the Council in this regard. Decisions on the exact quantum of SIL release and the exact location and nature of subsequent development should be progressed through the production of these plans and frameworks TFL COMMNETS ON CONTINGENCIES It should be noted that the successful delivery of Crossrail is also reliant on Network Rail and the Department for Transport- not just TfL. TfL would suggest that the statement â€˜no decision has been made by the Mayor of London on new river crossingsâ€™ is slightly misleading, as while the final decision on the best way forward is yet to be made, the Mayor has given his agreement to a package of measures designed to reduce the barrier of the Thames in east London, with the aim of going out to public consultation on these river options in 2011.	Royal Borough of Greenwich are not preparing a Waste DPD. The South East London Joint Waste Technical Paper has been prepared as part of the evidence base for the Core Strategy. The boundaries of the SIL have been re-drawn to take into account the GLA's concerns. Masterplan SPDs have been prepared for Charlton Riverside and Greenwich Peninsula West. Para 3.4.12 refers to external organisations, including TfL. It is not meant to be an exhaustive list. The reference to the Mayo's decision on a new river crossing has been deleted.
DC S31	Laurie	Baker	London Geodiversity Partnership				Appendix One â€" Documents of the Evidence Base The report on London Plan implementation guidance, â€˜Londonâ€™s Foundationsâ€™ should be quoted as a document providing evidence (as well as a footnote to paragraph 4.5.20).	Documents of the Evidence Base (now Appendix 5) lists some of the documents used in preparing the Core Strategy. It is not considered necessary or appropriate to include "London's Foundations" here.
DC S33	Caroline	Evans					This is an unprecedented opportunity to co-ordinate the future development of Greenwich at a point when there will be many changes and opportunities. It is exciting and important for everyone in Greenwich. Can you confirm how people who are visually impaired, or those with literacy problems are able to take part in this very detailed exercise? Are there versions of this document and questionnaire in community languages - very important given the racial mix in the borough. Additionally, I would like to see a Supplementary Planning Document for Greenwich Riverside area. I am concerned about traffic in the borough and don't feel that issues of traffic have been adequately addressed: with the additional dwellings planned there will be more pressure on the transport infrastructure. I am also concerned that the unique and distinctive character of Greenwich is maintained as this is one of the appeals to tourists and visitors. If our highstreets and town centres take on the uniform feel of those all over the country we will have lost something very special and irreplaceable. that means fewer major chains and more local, sole traders, who ensure a distinctive character - as we have had in the market, now threatened by the Greenwich Hospital planning decision. Please also ensure that full consideration goes into healthcare and education facilities, also small local shops that give an area a focus and sense of community.	Translations of the document into other languages or Braille can be supplied on request. It is not proposed to prepare an SPD for this area. An Infrastructure Delivery Plan will be published alongside the proposed submission version Core Strategy.

DC S34	Palvinder	Banwatt					1.0 Mechanism of consultation CCRA appreciates the range of approaches employed by LBG to consult with interested parties, in particular the attempt to hold exhibitions around the borough. The councilâ€™s desire to reach as broad a section of the community as possible is clearly evident and, as a strategic partner, CCRA is well positioned to assist with the latter exercise. We are therefore surprised (and concerned) at not receiving prior notification of the consultation event; had we done so we would have been better able to co-ordinate a comprehensive response from our area which will be directly affected by the proposed development of Charlton Riverside. The timetable for production of the Core Strategy indicates that consultation on the proposed submission version will take place between September and November 2011. As the Charlton Riverside development will be very close to, and impact directly on, Central Charlton we would like to see a stronger commitment from the Council to consult fully with organisations in adjacent areas in order to inform the next iteration. 2.0 The Draft Document The Core Strategy presents a comprehensive picture of Greenwich in 2011 and a clear vision of the Borough in 2027 based on residentsâ€™ feedback about their priorities. However this draft was probably produced before the country entered a period of economic and political flux; it would be helpful therefore to have an update regarding the status of this document in light of the policy and regulatory changes being introduced by the coalition government. To what extent is the content of the Core Strategy still relevant? Does the proposed timetable for the adoption of the strategy remain valid? Our understanding is that, as the Mayorâ€™s plan was retained, the targets for London remain. Feedback from members attending the exhibition events has highlighted that there may be two versions of the strategy document in circulation. A copy sent through to some of our members was different to the one they had accessed on the website. In light of this, it would be helpful to have clarification regarding the validity of the consultation exercise. The response presented in this document is based on the original document available on the LBG website. Overall the proposed strategy is based on very positive forecasts of economic growth and the Olympic legacy; however the current downturn in the economy can have a significant long term negative impact which will require the alternative approaches presented in the document to be revisited. CCRAâ€™s concern is that in a number of instances viable alternative approaches have not been presented in the document. There is much mention in the document of the Olympic Legacy in Greenwich but, apart from the intrinsic value of the Olympics, there is no clear picture of what this legacy will actually be. A sense of pride about the role of Greenwich in the 2012 Olympics will be difficult to sustain in 2027 unless there is a more concrete, physical legacy. 7.0 Summary CCRA feels that the following need to be amended, strengthened and/or included in the Core Strategy: ïƒ˜ A more realistic appraisal of the proposals in light of the current economic situation. Some of the alternative approaches may now have greater validity. ïƒ˜ A greater commitment to full consultation with groups and organisations impacted by the development of opportunity areas. ïƒ˜ Greater emphasis on monitoring and enforcement, an area that is barely considered in the document. ïƒ˜ A commitment to only increasing the density of housing if it will not lead to a deterioration of the environment, increased deprivation and isolation. ïƒ˜ A stringent approach against piecemeal, small scale development that will have a cumulative negative impact on the neighbourhood. ïƒ˜ A stronger vision for protecting and increasing the number of open spaces with concrete proposals to increase the safety and wellbeing of users. ïƒ˜ Greater consideration of the accommodation requirements of older people and people with disabilities. ïƒ˜ A stronger commitment to protecting and improving existing accommodation used by local communities. ïƒ˜ A commitment to improving and enhancing those areas that lack the services and facilities to become truly cohesive and health communities. ïƒ˜ A firm commitment to secondary provision in Charlton. ïƒ˜ A broader vision for the use of Section 106 contributions to improve local communities. ïƒ˜ Greater emphasis on attracting a wider range of businesses into the borough to increase opportunities for local people to broaden their skills base and effectively compete in a challenging employment market.	Consultation on Royal Borough of Greenwich planning policy documents is in accordance with the Council's Statement of Community Involvement. Consultation for the development plan does last for twelve weeks, double the statutory minimum. As a respondent to this consultation CCRA will be notified at the next stage in the process. Consultations are advertised in Greenwich Time and on the Council's website. Section 3.5 addresses contingencies for uncertain aspects of the strategy. Appendix 1 details the monitoring framework. An Annual Monitoring Report is also prepared. Policy H5 Housing Design seeks to balance a site's location and the character of the area with housing density. Policy H5 expects new homes to be built to Lifetime Homes standard and a proportion of wheelchair housing is expected. Policy H(d) addresses the provision of supported housing. A masterplan SPD has now been prepared for the Charlton Riverside area. This will reduce piecemeal small scale development. The Infrastructure Delivery Plan considers requirements for education and forms part of the evidence base for the Core Strategy. It is considered that open spaces are adequately protected by policies in the Core Strategy. An Open Space Strategy is in preparation. This will seek to enhance existing open spaces where possible.

DC S38	Metropolitan Police Authority		Metropolitan Police Authority	Brian	Coughlan	CGMS Consulting	National Policy 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. Strategic Policy At strategic level, paragraph 3.99 of the London Plan states: 'initiatives relating to policing and community safety and crime reduction are seen as increasingly important in improving the quality of life of many Londoners'. Policy 3A.17 Addressing the needs of London's diverse population states that the diverse population's needs should be met through the general and specific policies relating to the provision of social infrastructure including 'policing facilities'. This is also reflected in Policy 3A.18 which states: 'Policies in DPDs should assess the need for social infrastructure and community facilities in their area, and ensure that they are capable of being met wherever possible', and specifically highlights policing facilities. Policy 3A.18 further notes that development plan policies should seek to ensure that appropriate facilities are provided and that the net loss of such facilities must be resisted. Policy 3A.26 highlights the importance of ensuring communities benefit from development including through Section 106 agreements, improving safety and security and ensuring the community has access to a range of community facilities including policing facilities. Policy 4B.4 Industrial Locations identifies the potential for surplus industrial land to help meet local and strategic need for social infrastructure. This is also reflected in the emerging Consultation Draft Replacement London Plan (October 2009) at Policy 4.4 part A. Local Policy Furthermore, policies SC1 and C1 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. Given the support for policing within the national and regional planning policy context, it is therefore appropriate to ensure that the needs of the MPA/S are reflected within the Core Strategy with Development Management Policies document. The following representations have taken into consideration the planning policy framework at national, regional and local level outlined above. It is considered that the representations, while providing a better policy support for policing, will not have a major impact on the aims and objectives of the document.	Comments noted.
DC S40	Clare	Kemsley					I live on Greenwich High Road and feel strongly that there should be appropriate detailed long-term plans for the areaâ€™s development. In particular, we need a supplementary planning document for the immediate area. I make particular reference to the two strategic objectives of the Draft Core Strategy: * â€˜to protect and enhance Greenwichâ€™s rich natural and built heritageâ€™ * â€˜to promote high quality architecture and urban design in all developments in Greenwichâ€™. Itâ€™s important that Greenwich High Road sees effective implementation of these objectives. A lot of piecemeal development has already happened or been planned, and I donâ€™t think that it all meets these criteria. However, we should not assume that itâ€™s too late to implement more appropriate planning. Immediate steps should be taken to make sure any further development is planned and controlled with a supplementary planning document or equivalent neighbourhood plan. The architectural character of the area should be improved (or maintained where appropriate), rather than worsened by development. And it must have a positive impact on the experience of current and future residents. I am keen to continue living on Greenwich High Road and I hope that new developments retain whatâ€™s good about the area, and make real improvements where necessary. However, we canâ€™t rely on piecemeal planning to achieve this. I have strong concerns that without appropriate long-term planning, it may deteriorate as a residential area rather than improve. I hope the council is able to ensure that a supplementary planning document is produced for our area.	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

DC S42			Greenwich Peninsula Regeneration Ltd	James	Wickham	Gerald Eve	Introduction You will be aware that GPRL previously submitted comments to the Core Strategy Issues and Options Consultation, in our letter of 7 April 2008. The principal issue which we sought to address at that stage related to the lack of emphasis on the delivery of development on the Peninsula as a key component of the spatial vision for the Borough. Despite the acknowledgement of this comment within paragraph 1.3.3, page 7, we remain concerned that this issue is still not adequately addressed in the emerging document. We suggested the inclusion of the Greenwich Peninsula in the boroughâ€™s town centre hierarchy and welcome the fact that it is now identified in the key diagram as a District Centre (Proposed). However, we remain concerned that details of this proposed allocation do not reflect the extant planning permission and the areaâ€™s significant potential as a new urban quarter for London. We are also concerned that the Core Strategy seeks to limit the potential of the Peninsula to the quantum of development established under the existing outline planning permission, rather than recognising its potential, in the longer term, for additional development and growth. The Core Strategy should be a positive, flexible and forward looking document focused on delivery. It should encourage developers and other stakeholders to explore opportunities for additional development and opportunities in order to ensure the most efficient use of land. We also remain concerned about the lack of priority, emphasis and detail given to securing delivery. Many policies are highly aspirational or potentially contradictory and we are concerned that, without clear policy emphasis being placed on securing efficient, timely delivery through the flexible application of policy, the document risks being unsound as it will ultimately prove undeliverable. The general theme of delivery currently appears to be little more than an afterthought, and is uncomfortably separate from the main strategy. It should, in fact, be a central theme of the document. The potential inflexibility of some detailed policies was a topic we previously raised concerns on, particularly in relation to housing. Again, we continue to have concerns over the suitability and implications for delivery of the emerging housing policies. We have expanded on all these points in our comments, below, as well as additional issues arising in the consultation document. Our detailed comments are as follows: Conclusion In summary, whilst we broadly welcome the Greenwich Core Strategy, we consider there are a number of areas which require further consideration and amendment in order to produce a sound document that sets an appropriate basis for the development. In particular, it should more strongly emphasise the development of the Greenwich Peninsula as the single most important area for achieving the Boroughâ€™s overall objectives. It should recognise both the scale of the existing and permitted development on the Peninsula as well as its longer term strategic significance and ability to accommodate additional development over the plan period by adjusting North Greenwichâ€™s position in the boroughâ€™s centres hierarchy to that of a Future Major Centre. The Core Strategy should also be explicitly delivery-orientated to ensure it is effective and sound. It should recognise the challenges of delivering Londonâ€™s second highest housing target, especially in challenging economic circumstances, and indicate a willingness to be flexible and pragmatic in order to ensure that the overriding priority of delivery is achievable. We hope these comments are helpful and will be taken into account in drafting the Submission Core Strategy. If it would be useful to discuss any aspect of these comments please contact James Wickham or Graham Oliver of this office.	The hierarchy of Town Centres is determined by the GLA.
DC S43	Barbara	Reid					I support the view of the Ashburnham Triangle Association that we need a Supplementary Planning Document. Providing the current residential population of this part of West Greenwich, and the estimated 8,000 newcomers, with a planned infrastructure that will deliver school places, health provision, linked green spaces, and all the other elements of a healthy and cohesive community, is a major challenge. It will not be met without a specific and transparent local planning exercise across both boroughs. Creating an SPD is the essential starting point. Lewisham will have its own longer-term plans for the Creek, this strengthens the need for an SPD. ï‚§ The Opportunity Area 7 plans , mentioned briefly in the Core Strategy, call for the creation of a new residential and cultural community west of Greenwich Town Centre. This â€˜Creekside Strategic Development Locationâ€™ is ill-defined in the Core Strategy. It includes both the Lewisham and Greenwich sides of Deptford Creek, plus Norman Road and Greenwich High Road (thus linking closely with the Ashburnham Triangle). ï‚§ The Core Strategy envisages creating a Greenwich/Lewisham area of cultural and creative employment in the OA7 area. There is no detail how this cross-border development is to be managed. ï‚§ Current development plans for Greenwich will see 8,000 newcomers joining existing residents in the OA7 area by 2012. There is likely to be significant further residential development within the OA7 area post 2012. Meanwhile, during the lifetime of the Core Strategy, Lewishamâ€™s massive Lethbridge development close to the borders of the OA 7 area will further increase numbers, and pressure on infrastructure. ï‚§ The Core Strategy provides no detail about how existing residential areas (including the Ashburnham Triangle) and the new developments within the OA7 area will be brought together as one new and cohesive community, and provided with the necessary infrastructure. ï‚§ Without more detail in the Core Strategy, the western edge of the Borough seems unlikely to develop into the Creek-based Opportunity Area	Although joint preparation of an SPD for this area with Lewisham Council was previously considered; there is now limited future development potential on sites that are either undeveloped or do not have planning permission. An SPD is therefore not considered to be necessary or appropriate at this stage.

							its current and potential inhabitants, in both Greenwich and Lewisham, are promised. There is already an urgent need for a coherent neighbourhood plan, agreed by both Boroughs, in consultation with residents. Over the period covered by the Core Strategy, this need will intensify. OA7 will not become one of the cohesive and healthy new communities promised in the Core Strategy without a Supplementary Planning Document.	
DC S69	Laurie	Baker	Eltham Society				The Society supports the general principles of the Core Strategy and Development Management Policies and compliments Council officers on a well-presented document	Support noted.
DC S62	M	Everett	Charlton Athletic Football Club	Aaron	Peate	Indigo Planning	The Clubâ€™s home stadium is The Valley, Floyd Road in Charlton, and their training academy is at Sparrows Lane, New Eltham. As a general point, the Club wish to ensure that scope and flexibility exists in planning policy to support the enhancement of elite sporting facilities and those that provide sporting and leisure opportunities for the local community. The Clubâ€™s ambitions are to return the Club to the Premier League and the ability to improve the Clubâ€™s facilities will be integral to achieving this goal.	Comments noted.

DC S46	Susan	Proudfoot					The Strategy, particularly on open spaces, is greatly welcomed. However the challenge is to ensure that it is followed on the ground by councillors and officers and does not become just a wonderful wish list. If it is followed then Greenwich will indeed be a great place to live work visit and study.	Comment noted.

DC S84	Anna	Townend	Greenwich Environment Forum				Public views: Please consult more - the LBG Policy unit made a good attempt, but it was fragmented and too short. Another fuller 'Exhibition' would be welcome. We welcome the 'well designed' documentation of this consultation. Understandably the consultation has been rather less/more than the Council probably expected, arising just after Christmas. Please ensure the Draft Core Strategy reaches the widest parts of the Boroughs population. Many of the groups we have contact with have not been able to make full appraisal of the documents and would like a longer period to be 'set aside' in which to fully contribute. That being said officers of LBG have made sterling efforts in times of financial and staff constraints. What about local Councillors, have there been ward meetings conducted by them at all. Could there not be some opportunities of 'partnerships here, in the big society policy theme?	Consultation is carried out in accordance with the Statement of Community Involvement and for Development Plan Documents consultations last for twelve weeks, double the statutory minimum.
DC S75	Paul	Maloney	Langton Way Residents Association				We commend the council team on the quality of the draft prepared for public consultation, and it is clear that the Council team have put a great deal of work into producing the Core Strategy, and providing a detailed analysis of the borough including current status, planning challenges, a vision for the future and proposed approach. We are very pleased to have been invited to the workshops and welcome the opportunity to contribute to the process.	Support noted.
DC S45	Peter	Rice					very well written and presented - not strong enough on improving transport for road users. Overview/ statistics gave a good insight into the economic and social problems The document refers to closure of public houses and social implications, as well as job losses - possible business tax breaks could help alleviate this. This is an important part of society - on a similar basis financial help in the form of Council tax breaks, rent holidays for council owned business premises or reduced rents for first years of tenancies woudl help new start businesses - although beyond the remit of the draft core startegy this could be progressed by LBG estates/ valuers.	Comments noted.
DC S71		Tilfen	Tilfen Land Ltd	Craig	Blatchford	Blue Sky Planning	You will be aware that our clients have significant landholdings in and around north Greenwich, particularly in the Woolwich and Thamesmead areas. You will also be aware of our clientâ€™s substantial development activities in the Thamesmead area and the extant consents for new developments such as Tripcock Point, Broadwater Dock, Pettman Crescent, etc. Accordingly, Tilfen Land is a very significant stakeholder in the area and is a key partner with the Council in delivering any strategy for the regeneration of this part of the Borough and the wider sub region. We have considered the Greenwich Draft Core Strategy with our clients and we are instructed to make the comments set out below. Our clients are keen to ensure a dialogue with the Borough Council during the plan preparation stages in order to deliver viable developments in the Borough. Therefore, further to our telephone conversation with Holly Gilbert we request a meeting with Officers of the Council at the earliest opportunity. We note that a number of documents which will comprise the evidential basis for the Core Strategy are in preparation and not yet available. Given the potential consequences of the findings of these studies (e.g. Tall Buildings Assessment, Affordable Housing Viability Assessment, etc) we reserve the right to make further comments on the Draft Core Strategy as appropriate. Where there are themes which cut across a number of policies or matters that are repeated in different	The documents forming the evidence base of the Core Strategy will be published alongside the proposed submission version document in 2013.

							policies or explanatory text, we have not sought to make representations in all cases. However, it is presumed that the Council will apply the comments to all relevant policies, proposals and explanatory text.	
DC S77	Geoffrey	Belcher	Maritime Greenwich World Heritage Site				The following are listed as issues from the previous consultation and which should be reinforced through this round of consultation: â€˜Heritage should have a more prominent place in the Core Strategyâ€™ â€˜The Tourism potential of Greenwich has not been fully realised and represents an opportunityâ€™ â€˜The River Thames is an important asset for freight, leisure and industry and this should be recognised as a key feature of the Core Strategy.â€™	Protection of heritage is one of the strategic objectives of the Core Strategy. Policy DH3 specifically seeks to protect and enhance heritage assets. Policy EA3 supports the expansion and diversification of the Borough's tourism industry. Policy IM5 seeks to increase movement of freight by water.
DC S60	Lawrence	Smith	Westcombe Society				WS committee members found the workshops very interesting and worthwhile but would have preferred them to be earlier in the consultation period thus allowing more time afterwards for consideration and response. There needs to be a structure for enforcement of policies that is independently monitored. Greenwich does not seem to be very good at looking at the wider as opposed to local effect of planning applications.	Comments noted.
DC S57	Judith	Cooke	Environment Agency				We are pleased to see that the comments in our response to the Issues and Options stage (our letter dated 4 April 2008, reference 2006/100673/PO-01/IS1) have been largely incorporated. Overall the Greenwich Draft Core Strategy appears justified, effective and consistent with national policy as described in paragraphs 4.36 to 4.38 and 4.44 to 4.47 of PPS12.	Noted.
DC S67	A.E.	Hart					Population - The Borough has had an 11% increase in population since 2001 (1.5.5). It need not and should not continue to take in & provide housing for people outside the Borough for the sake of the London Plan. The â€˜Thames Gatewayâ€™ has been discredited: with climate change it is not wise to put housing on a flood plain, 4.6.13 to 4.6.23. These areas identified in the Draft Core Strategy (â€˜DCSâ€™) by the R.Thames have traditionally been industrial and should not become areas of new housing but places where new businesses & industry can serve the economic needs of the population that is already here.	The London Plan housing targets are fixed. Significant areas of industrial use are retained in the Core Strategy.
DC S85	Frank	King					I will not hide the fact, indeed it is very obvious from my comments above, that I do not like this Borough being told my the Mayor of London that it must build so many houses in such a short time, especially as these houses are to be used to "decant" unwanted tenants from the central Boroughs. All housing developments should be controlled and the main target should be to house our own housing backlog before allowing any more residents to come into Greenwich until we have achieved this aim. CrossRail or the DLR should be extended to Bromley, calling at Kidbrooke; Eltham; Mottingham and New Eltham on the way, thus connecting the four different Mainline Rail Routes for which we have to go to London to access at present, and solving in one fell stroke the Greenwich North - South divide. In the housing developments there should be one block of flats for disabled and older people like myself who do not want to go into the present assisted housing schemes because they would lose their independence. This Block of Flats should be at least ten stories, up to fifteen stories, with the Ground Floor having two wardens flats, three or four community rooms and provision for mobility scooters to be stored and recharged, A Dining Room and kitchen and finally The usual Doctor's Nurses Treatment room. It must also have one Fire Lift which calls at all floors and any other lifts should also call at all floors. All of the Flats should have good fire doors so that residents can stay inside if there is a fire until help arrives. There should be a Master Lock Series so that each resident has their own front door key, but the Warden has a Master Key which is only to be used by invitation of the resident, or in an emergency. All of the Flats would be self-contained with their own Shower or Bathroom, Kitchen etc in separate rooms (Not with the Kitchen in the living room). Only One Warden would be on duty. There one resident warden for the day shift, and the other for nights and weekends. This would provide all of the help that even the most disabled residents would need, with the most time being spent with the most disabled as required from time to time. This would mean that it would be completely each resident's choice how much they wanted to mix with the other residents and when they chose to mix, but with all of the support that they need from the Wardens when they needed it. I have advocated that 100 yards all along the River should be kept entirely free from houses so that the River can be developed and used well into the future. That a duel carriageway road should be incorporated into the waterfront development, where possible on this 100 yard exclusion zone, to	Expansion of Crossrail and DLR to Bromley is not currently proposed so it is not appropriate to include this in the Core Strategy. Policy H(d) concerns supported housing but detailed design and management of elderly and disabled living accommodation is outside the remit of the Core Strategy.

							connect Pettman Crescent/Western Way in the West to Creek Road in the East via Bugsby's Way to both solve the transport problems in Charlton and the Peninsula and to connect all of the river crossings, both existing and proposed. The only real logjam stopping this is the Woolwich Dockyard Estate which is a perfect example of building houses within the 100 yards from the River being a block on developments for a hundred years. I have also proposed that a Tunnel (or Bridge) be build to connect the A205 and A406, either re-siteing the Ferry either up stream or downstream of it's present location so that this Major Road Link can run from the end of John Wilson Street, with the new Dual Carriageway joining it at the Ferry site. I have advocated bringing unused properties into use by imposing Rates on empty properties unless there is very good reason to exempt an empty property from rateable taxes, and to encourage any suitable rooms to be converted into Bed & Breakfasts to encourage Visitors and Tourists to the Borough who cannot afford Hotel prices (and there are thousands of people who would come). I have detailed my own vision for Greenwich to have all four types of Waste Disposal Plants built within the Borough. I have advocated the provision of Natural and Woodland Burial site, in the Borough, an amenity which is much needed. I have suggested a major shopping and office development at the western end of Woolwich Town Centre, which, because of its mixed design, is perfectly feasible. I have appealed for the sake of the health of all Greenwich residents, the banning of any further unhealthy fast food outlets. I have suggested a form of assisted living with dignity and privacy for the residents who cannot "fit" into the present models. One idea that I have not mentioned above is the problem of cyclists using the pavements, especially a long Dual Carriageways. All new roads should provide cycle tracks on the inside of the pavements. I have advocated the use of Solar Panels to provide the power for community lighting, lifts and car charging points, which could be sited on the top of buildings thereby being adjustable to the Southern Aspect required for their maximum efficiency and reducing the Council's electricity bills in the process. I also suggested that a list of sites of interest and buildings of interest should be compiled (please see my comments on section 3.2.14.). I feel very strongly that, although this is not part of the Core Strategy, the relevant department of the Council should be shown (or given) my proposal for a comprehensive booklet containing all places of interest in the Borough, and my suggestions for how this booklet should be circulated. One thing that I forgot to mention above is that this list must, of course, be published on the GBC Website. Questions 2 1; 24 and 25 I strongly object to these three questions. I never answer these questions and firmly believe that these three questions should never be asked. Question 22: Male. Question 23: Over 60 (by a long chalk). Qu estion 26: Yes, (disabled). Foot Note 1: Where J have said Greenwich Town Center I was referring to Greenwich Market and the one way system around it. Foot Note 2: Thanks for the two extra days. Typing the above is very painful if I have to do more than about an hour a day because of the Arthritis in my hands and back. Foot Note 3: I hope that the above is of use, if not please disregard that which is of no interest. Foot Note 4: Sorry if printing on both sides of the page is not very convenient for you, but I wanted to conserve paper. Foot Note 5 : Please pass-on any of my suggestions which any other Council Department may find interesting or useful.	The imposition of rates on empty properties is outside the remit of the Core Strategy. A masterplan SPD has been prepared for Woolwich town centre. Policy TC(c) concerns hot food takeaways and seeks to restrict disproportionate clustering of such uses. Policy IM4 supports sustainable travel including cycling and Policy IM(b) seeks to improve provision for cyclists. There is a list of nature conservation sites in the Core Strategy and the local list of buildings of interest is on the Council's website. No changes required to Core Strategy.
DC S78		Berkeley Homes	Berkeley Homes (Urban Developments) Ltd	Bob	McCurry	Barton Willmore	Berkeley Homes are currently working in partnership with the Council on a number of strategically significant regeneration projects, including the redevelopment to the Ferrier Estate, Kidbrooke, and the Royal Arsenal, Woolwich. Our client is a key stakeholder and wishes to ensure that engagement with the Council on policy issues continues in the future. We would therefore welcome a meeting with colleagues from your Planning Policy and Development Management Team to discuss the emerging Core Strategy and Development Management Policies. We would like to thank the London Borough of Greenwich for the opportunity to comment on the Draft Core Strategy documents and we look forward to being consulted on the â€˜Proposed Submission Versionâ€™ of the Core Strategy in due course. Our comments on the Draft Core Strategy are attached and we have also sent an electronic copy via email for your records. We hope that our comments are useful and that a meeting to discuss our clientâ€™s strategic sites and future planning policies can be arranged. We look forward to hearing from you and being consulted on future drafts of the Core Strategy, as well as other policy documents. In particular, we would like to be kept informed of progress on the Surface Water Management Plan and on the decision to produce a Supplementary Planning Document (SPD) for Woolwich Town Centre. Section 1.1 summarises the Role of the Core Strategy and highlights that the Development Management Plan Policies have been included to provide additional detailed policy guidance. We feel that this approach in one single document is not appropriate and contradicts the purpose of the Core Strategy. Planning Policy Statement (PPS) 12 on Local Spatial Planning states that Core Strategies should establish: ïƒ˜ an overall vision which sets out how the area and the places within it should develop; ïƒ˜ strategic objectives for the area focussing on the key issues to be addressed; ïƒ˜ a delivery strategy for achieving these objectives; and ïƒ˜ clear arrangements for managing and monitoring the delivery of the strategy. The Core Strategy should be a Strategic document and additional detailed policies should be included in other Development Plan Documents (DPDs), as recommended in PPS12. Therefore, we would	Comments noted. National planning guidelines do not preclude the combination of development plan documents therefore it is considered appropriate to include the Core Strategy and

							have expected the Council to publish its Development Management Polices in a separate DPD subsequent to the Core Strategy being adopted. As a result, we would question the effectiveness of the Core Strategy in attempting to deliver a strategic vision for the borough whilst including detailed Development Management Policies in the same Core Strategy document. We would therefore suggest that the Council separates the Development Management Policies from the Core Strategy and publishes these in a separate DPD at the appropriate time after the adoption of Core Strategy.	Development Management Policies in one document.
DC S52			Greenwich Hospital	Mark	Underwood	Drivers Jonas Deloitte	Greenwich Hospital notes that the document sets out draft Development Management policies which, once adopted, will be considered by the Local Planning Authorities in the determination of planning applications. Greenwich Hospital supports the incorporation of these policies within the document to ensure that an appropriate planning policy framework can be applied to future development in the Borough. However, we seek to emphasise the importance of ensuring that Development Management policies are not overly prescriptive and enable the determination of applications on a case by case basis, in particular policies relating to Town Centres (TC) and Design and Heritage (DH).	Noted.
DC S80	Janet	Goulton	London City Airport Limited				Where future development of London City Airport (LCA) is referred to in this response, it relates firstly to the Airportâ€™s current planning permission to grow to 120,000 aircraft movements per year (from c73,000), and secondly to LCAâ€™s aspiration to meet some of the medium-term demand for air transport in the south east identified by the 2003 Aviation White Paper, as outlined in the LCA Master Plan, which is available at www.londoncityairport.com.	Noted.
DC S88	Sarah	Dye	Cory Environmental Limited				Background Cory transports approximately 650,000 tonnes of waste every year from central London to landfill facilities outside of the capital, using six tugs and 47 specially designed container barges. This saves over 100,000 heavy goods vehicle movements each year on Londonâ€™s roads and is the only river-based service of its kind operating in the UK. Cory are currently in the process of commissioning an Energy from Waste Facility at Belvedere in the London Borough of Bexley, once this commissioning process is complete, Cory will deliver waste to feed this facility using its fleet of tugs and barges. 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. Charlton Bargeworks is the headquarters of the Coryâ€™s lighterage operation, it also serves to repair and service Coryâ€™s tugs and barges. The site is located approximately 0.7km to the west of the Thames Barrier.	Noted.

DC S48	Peter	Luck					1. Both the favoured strategy and the alternative are seen as high growth strategies but the alternative is rejected in large part because, in producing fewer dwellings in Charlton Riverside, it may not support improved transport in that area. Is this the major concern? Should more attention be given to acheiving a high level of employment and a high level of variety in employment including businesses dependent on manual skills and the 'messy' trades? Is it good for London if these are pushed further and further to the periphery when the centre still has need of them? Probably not. Is it reasonable to suppose that all inner city dwellers will be content to work in office, retail or (non-messy) service roles? Probably not. What discontents will arise from insisting on these employments, as the preferred strategy seems to do? 2. The above comments also apply to the western side of the Greenwich Peninsula. The Strategic Development Location as defined in the preferred strategy takes in existing 'live' industrial areas as well as the newly cleared Syral site. Are these live areas safe from de-industrialisation? And should not the Syral site remain in the Strategic Industrial Location? The Syral site includes a Safeguarded Wharf but the report defining these wharves is now a little aged and refers (p97) to hopes for the resumption of grain importation at that wharf. Clearly that is no longer feasible with no facility for receiving it and the development of the cruise liner terminal at Enderby Wharf will effectively block it to shipping. Therefore, is there a potential to shift the 'Safeguarded' designation to Morden Wharf and Primrose pier which could be made usable and remain within the Strategic Industrial Location? I think there should be, in order to keep open the option of increased river freight use - Sainsbury's experiment with containers by river into London was abandoned but it would be bad policy to close the door on further similar practices. 3. While appreciating the desire to have the cruise liner terminal ready by 2012, the timing is horribly tight. The need for the terminal is not consequent on the Olympics. Does the imposed deadline risk a lastingly disadvantageous compromise on quality? Very likely, especially if the matter is put entirely in the hands of contractors. What is being done to minimise that risk? Should the timetable be relaxed? Very likely. 4. How much reliance should be placed on the completion of Lovells/Badcocks/Pipers which appears to be utterly stagnant? 5. Regarding architectural quality, which is, admittedly, difficult and contentious for planners to deal with, what steps are Greenwich taking to avoid being bamboozled by developers' visualisations? You print one such showing Greenwich Village West, all shiny and cheerful, but the reality is a rather clumsy block in non-alluring shades of elephant. Lovell's, which looked, even to my eyes, quite attractive in illustration, has turned out glum. All along the Thames, not just in Greenwich, the standard of residential architecture has been generally low. 6. The areas of archaeological potential should be extended inland on the peninsula and Charlton riverside to support further study of industrial remains. For the same reason the zone should be extended onto the foreshore which has been shown to be full of important traces by the work of the Thames Discovery Programme. 7. Last comment: In all development in areas where there has been important industrial usage in the past more care should be taken in the design of that development to preserve traces of that industry and of the pre-industrial. Too much has been lost on the peninsula, probably down to the pre-millenial rush and excessive political enthusiasm for the new, certainly not all of it needfully. As an example, the distinctive historic alignment and full length of River Way (once Marsh Lane) could have been retained, not necessarily as a vehicular road but where not , as a pedestrian or cycle way through housing. The important thing was to retain the sense of a past 'bleeding through' into the present. The preservation of the Pilot Inn and the terrace next door, although very welcome, has not acheived that: it appears , rather, as decontextualised, isolated, and a too obvious concession.	The number of dwellings to be provided across the Borough is determined by the GLA. Both the Charlton Riverside and the Greenwich Peninsula West Strategic Development Locations propose a mix of uses. Safeguarding of wharves is in the remit of the Mayor of London. Policy H5 seeks to ensure that new housing design takes the existing character of the area into consideration. English Heritage has appraised the Areas of High Archaeological Potential and these have indeed been extended. Revised areas will be shown on the Proposals Map.
DC S87			Densitron Land Limited	Andrew	Gale	Drivers Jonas Deloitte	Densitron own the free hold of a 0.49 hectare site in Blackheath known as 'La nd at Blackheath Park' (The Site). A Site red line plan and location map is enclosed with this letter. The Site is designated within the adopted Unitary Development Plan (UDP) Proposals Map as Metropolitan Open Land (MOL). There is a wider area of MOL to the south and east, currently partially being developed as part of the redevelopment scheme for the Thomas Tallis Secondary School on Kidbrooke Park Road. Whilst the Site never actually accommodated a playing field, it was previously used in connection with playing fields to the south. The playing fields were purchased by the London Borough of Greenwich (LBG) in December 2007, for use by the Thomas Tallis School	Comments noted. No change to the designation of this site as MOL is proposed.

							redevelopment. A fence has since been erected to physically separate the Site from the private playing fields and the site is no longer large enough in its own right to accommodate a playing field. There is a dwelling adjacent to the south-west boundary of the Site and a larger block of residential accommodation just to the north-east. Currently on site there is a partially demolished clubhouse building, an overgrown area of gravel and hardstanding, formerly used as an informal car park, and disused tennis courts which have been unused for approximately seven years. The site has been subject to vandalism in recent years, resulting in substantial fire damage to the clubhouse building. The Site is visually unattractive and effectively fits the characteristics of an infill site and is capable of fitting in with the residential street pattern of Blackheath Park. These issues are explored further alongside assessment of individual policies below.	
DC S55			Sainsburys Logistics Limited	Christiaan	Robinson	Turley Associates	Sainsburyâ€™s Logistics Ltd. generally supports the Core Strategy & Development Management Polices DPD.	Support noted.
DC S64			London Fire and Emergency Planning Authority	Donald	Messenger	Drivers Jonas Deloitte	The LFB has 112 land fire stations located across Greater London. Six of these are located within the London Borough of Greenwich (Greenwich) as detailed below: 1. East Greenwich: 325 Woolwich Road, London, SE7 7RF 2. Eltham: 266 Eltham High Street, SE9 1BA 3. Greenwich: 4 Blisset Street, SE10 8UP 4. Lee Green: 9 Eltham Road, SE12 8ES 5. Plumstead: 1 Lakedale Road, Plumstead, SE18 1PP 6. Woolwich: 24 Sunbury Street, Woolwich, SE18 5LU	No action required.
DC S66	Philip	Binns	Blackheath Society				The Blackheath Society welcomes the production of this document and we appreciate the considerable effort that has gone into its production. Other general matters We note that throughout the Draft Core Strategy a convention has been adopted of giving titles to Tables at the foot of the Table. This in most respects is acceptable but it does raise a problem within the Open Space section of the document where, at page 113, it could be construed that NC42 to NC48 on that page are â€œSites of Borough Importance Grade IIâ€ rather than â€œSites of Local Importanceâ€. We recommend that, as with the current UDP and other documents of this nature (eg the (Draft) London Plan), a Glossary and Abbreviations section be appended to the document. We also suggest the inclusion of a schedule of documents produced by outside organisations to which attention is drawn within the Draft Core Strategy, as well as documents produced by the Council - for example, Design Notes, Action Plans, Strategy Documents.	It is agreed that titles to tables can be better located above the table in the case of the Open Space section; however this is a feature of the software used to prepare the Core Strategy. Title locations will be amended for the adopted Core Strategy if possible. A Glossary section has been inserted at the back. Appendix 5 contains documents of the evidence base.
DC S76			Her Majesty's Court Service	Amy	Jones	DPP	HMCS is an executive agency of the Ministry of Justice (MoJ) with a remit to deliver justice effectively and efficiently to the public. As such, HMCS is responsible for managing the Magistrates' Courts, County Courts, Crown Court, High Court, and Court of Appeal in England & Wales. As part of its remit, HMCS is continually reviewing its substantial portfolio of buildings and property to ensure it best meets modern and evolving needs, as effectively as possible in the interest of public justice and the public purse. In many instances throughout the country and particularly within Greater London, HMCS has requirements to expand, consolidate, merge, or relocate its premises. This is to ensure both efficient and effective delivery of its services and improved flexibility to allow for future changes in response to new pressures and requirements. Following from this, there is a need to adapt and construct new Court facilities, especially in areas subject to substantial population growth or change. In other circumstances, existing courts may be displaced as a result of wider development aspirations or regeneration initiatives. As a direct consequence, court facilities are affected by new development. A key factor that affects and informs HMCS' assumptions in terms of projecting future needs, is the level and location of growth being promoted through Local Development Framework (LDF) planning. As such, HMCS is seeking to work in partnership with LPAs to ensure that the strategic aspects of its service delivery are appropriately dealt with in planning policy. The important role that HMCS has in supporting communities has been recognised in the Draft London Plan, issued for public consultation in	Comments noted.

							October 2009. Paragraph 3.79 provides context to proposed Policy 3.17 â€˜Protection and Enhancement of Social Infrastructureâ€ and lists facilities that form part of the social infrastructure and states that these include â€œcriminal justice or community safety facilitiesâ€. As you are aware HMCS currently operates Greenwich Magistrates Court, Woolwich County Court, Woolwich County Court Annex, Woolwich Crown Court ,Woolwich Magistrates Court, and Belmarsh Magistrates Court within the Borough of Greenwich. It is within this context that we make the following representations to the Core Strategy Proposed Submission consultation document.	
DC S81	Linda	Hodgson	Heathway Residents Association				We commend the council team on the quality of the draft prepared for public consultation. We recognise that an exercise of this scale and difficulty takes a few iterations to iron out. We are very pleased to have been invited to the workshops and welcome the opportunity to contribute to the process. We offer specific comments in detail below but would like to draw your attention to the following four areas in particular: 1. Ensuring all the different elements of policy and planning work together properly, including effective monitoring and enforcement 2. Better protection for Conservation Areas, particularly with regard to density and local scale 3. The relative importance of residential gardens to the borough's ecology and biodiversity. 4. The need for greater protection of footpaths Primary Themes Consistency of Policy and Practice We believe that the Local Development Framework is sufficiently important to warrant an exercise to ensure and verify that all its various components are mutually consistent and properly joined up It is essential to ensure that planning 'practice matches policy'. All the good work going into the Core Strategy must be matched by implementing an appropriate planning organisation and set of processes, which will deliver it in practice. â€¢ New, large housing developments should not be approved or their building commenced before it's been confirmed that the requisite infrastructure will be in place to support them. This means ensuring that funds have been committed as well as plans being drawn up. â€¢ Sufficient authority and organisational resources should be provided to Policy EnforcementTeams to ensure that the Core Strategy policies are adhered to. Enforcement must exercise their authority consistently, to ensure their authority is maintained â€¢ We recommend creating a specific role 'Environment Officer' to oversee the cumulative effect of individual planning applications on green spaces, residential gardens, biodiversity and the local environment Distinctiveness of Heathway Heathway is a private, unadopted road with no public rights of way. It is noted by its resident and neighbouring communities, as well enjoyed by outsiders, for having a semi-rural ambience characteristic of a 'country village lane'. The Heathway Residents and Neighbourhood Watch Association are broadly supportive of the Councilâ€™s Conservation Area Appraisal for the Blackheath Conservation Area and the Management Strategy & Guidance document. We are particularly concerned to 'preserve and enhance the character of the street scene' in Heathway, as well as to 'maintain and enhance the tree cover'. We agree that Heathway especially is vulnerable to 'the risk of plot subdivision and erosion of character through incremental development, especially through backland development'. Heathway is a relatively rare example within the borough of a semi-rural mews lane. Originally the coach road to the large Victorian housing in St Johns Park and Vanbrugh Park, it remains defined by its relationship to these locally listed buildings. In particular the balance achieved between the built spaces and large extent of surrounding green spaces enhances their setting. Although sharing some attributes more in keeping with Blackheath Park, the particular combination of qualities of Heathway is highly unusual within the residential street scenes of the borough, which are otherwise predominantly urban in style. There are a number of specific elements, which contribute to this distinctiveness, but it should be noted that it is the overall combination, which needs to be preserved, 'the whole being greater than the sum of the parts'. 1. Sylvan aspect 2. Relatively low density of built versus green landscape, particularly in the western half 3. Diversity of building styles but with a predominance of detached houses with pitched roofs 4. Buildings being architecturally conservative and subservient to the sylvan whole 5. The separation of the lane into three distinctive 'sections', due to its winding narrowness and different degrees of development - from the semi-rural, unmade, western end opening off the heath - winding and narrowing to the lightly developed, 'secret' mid-section with original coach houses - opening and transitioning into the more developed eastern end at Stratheden Road Whereas the mixed nature of development styles is shared with Langton Way, it should be recognised that Heathway is distinguished by the predominance of pitched roofs and traditional building styles, as well as its winding. We feel that there is a genuine long-term threat to the retention of the remaining original houses in Vanbrugh Park, arising from the trend of unrestrained infill of their garden plots. We are keen to ensure that the Core Strategy works to provide real policy protection from these threats.	Support noted. Policy H(c) Backland and Infill Development, indicates the importance of gardens to ecology and biodiversity. Policy OS3 South East London Green Chain protects the extensive Green Chain footpath network. Policy IM4 Sustainable Travel safeguards all existing footpaths and encourages the development of new ones. Other comments are noted.

DC S83			UK Power Network	Sacha	Winfield-ferreira	BNP Paribas Real Estate	BACKGROUND EDF Energy Group (EDF) is one of the UKâ€™s largest energy companies and the UKâ€™s largest producer of electricity. A wholly-owned subsidiary of the EDF Group, one of Europe's largest energy groups, EDF generates around one fifth of the UK's electricity and delivers electricity to around 8 million customer homes and businesses through the public networks. UKPN was recently formed in 2010 and owns the long leaseholds of several of EDFâ€™s properties in London.	Noted.

Question 19 – Proposals Map Changes – Do you have any comments on the proposed amendments to the Proposals Map?

	consultee			agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Proposals Map Changes - Question 19: Do you have any comments on the proposed amendments to the Proposals Map?**	**Council Response**
DCS7	Sheila	Field					Please create a new OS number for the half-acre field east of Friars Mews, Eltham and show it in the UDP Proposals Map as green for Community Open Space.	The area to the east of Friars Mews is already designated as Community Open Space and is shown on the Inset Map for Eltham.
DCS10			CIS Ltd	Richard	Blyth		We support the identification of Charlton Riverside as a Strategic Development Location.	Support welcomed
DCS23	Nigel	Abbott	Cluttons LLP				We have made representations to other parts of the main Draft Core Strategy document which highlight our clients aspirations for the redevelopment of their site at Phoenix Wharf, Lower Norman Road for residential led mixed use purposes. This site is currently located within the area covered by Proposal J7. We would therefore urge the Council when re-examining the site schedules to have regard to this and to re-allocate J7 for residential led mixed use purposes.	Site schedules will be assessed during the preparation of the Site Specific Allocations DPD. It is anticipated that a first draft of that document will be consulted on in early 2013 and at that time, stakeholders will be welcome to put forward sites for consideration.
DCS24	John	Franklin	Greenwich Society				The Society notes the change of designation name of the defined Greenwich Peninsula West industrial area to Strategic Industrial Location, and its diminution in size now to just include the Victoria Deep Water Terminal adjacent Bay, Primrose and Morden Wharfs to the south; the boundaries of the Greenwich Peninsula West Strategic Development Location embracing Enderby Wharf and the land to the north up to Morden Wharf; and the boundary of the North Greenwich District Centre (maps 2, 4 and 5): and we also note the revised boundaries of the Ashburnham Triangle and Westcombe Park conservation areas (maps 7 and 11). However, we would draw attention to the need for the Proposal Map also to show, of course, the revised boundaries of the West Greenwich, Greenwich Park and East Greenwich conservation areas, when approved by Cabinet (understood at the time of writing to be imminent).	Agreed and any approved changes to the conservation area boundaries will be reflected on the Proposals Map once adopted.

	consultee			agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Proposals Map Changes - Question 19: Do you have any comments on the proposed amendments to the Proposals Map?**	**Council Response**
DCS25		Waite					3.1) Charlton Riverside as shown here is smaller than that shown in the key diagram (p.40) of the Draft Core Strategy. On the Proposals Map, the southern boundary appears to be Woolwich Road, but on p.40 of the Draft Core Strategy it appears to extend south of the railway line. Printing error? Clarification needed.	The boundaries shown on the Proposals Map have the more exact boundaries whereas the key diagram is diagrammatic and is not intended to show precise boundaries.
DCS32	Nicolas	Long					I support the ATA' s goal to amend the area of the Ashburnham Conservation Area to take in more of Greenwich High Road	The Ashburnham Triangle Conservation Area boundary was reviewed as part of the Conservation Area Appraisal adopted in December 2008. Should a further revision to the Appraisal take place requiring an amendment to the boundary that would be reflected in the Proposals Map.
DCS43	Barbara	Reid					It's good to see the amendments to the Ashburnham Triangle Conservation Area. The agreed additions take in more of the area along Greenwich High Road, which is central to the development of a cohesive and healthy new community linking the whole OA7 area, including Creekside, Haddo, and the Ashburnham Triangle.	Support noted
DCS86	Claire	Craig	English Heritage - London Region				In the absence of the Proposals Map itself, which was not provided with the consultation, we must note that PPS 12, paragraph 8.1 clearly states that areas of protection should be identified in the Proposals Map. In the context of the historic environment this means that Conservation Areas, Registered Parks and Gardens of Historic Interest, Archaeological Priority Areas, World Heritage Sites and their Buffer Zones, and any protected vistas in the London Views Management Framework that impact on the borough, should be shown on the Proposals Map. English Heritage is content with the Proposed Changes to the boundaries of the following conservation areas: - Ashburnham Triangle Conservation Area; - Sun in the Sands Conservation Area - Eltham Palace Conservation Area; - Rectory Fields Conservation Area; - Westcombe Park Conservation Area; and - Plumstead Common Conservation Area, As advised in this consultation document. Finally, English Heritage would strongly advise that the local authorities conservation staff are involved throughout the preparation and implementation of the LDF, as they are often best placed to advise on: local historic environment issues and priorities, sources of data; and consideration of options relating to the historic environment.	Conservation Areas, Historic Landscapes, World Heritage Sites and Buffer Zones and Strategic Views are shown on the Proposals Map. Areas of High Archaeological Potential will be available on the final Proposals Map too, following publication of an Appraisal of the borough's AHAPs by English Heritage. Conservation officers have been and will continue to be involved throughout the process.
DCS84	Anna	Townend	Greenwich Environment Forum				Higher importance for areas of Biodiversity importance. Species lists, woodlands and street trees and adjoining greenspace. It should now be common practice to maintain 'wildspace' for their importance - stripping out established habitat should totally be a thing of the 'unenlightened' past!	Comments noted and it is agreed with the sentiment that biodiversity is important to the borough. However, it is disagreed that things such as street trees should be shown on the Proposals Map, therefore no change is required.
DCS45	Peter	Rice					scales or scale bars would make it easier to read	The final proposals map will be to scale. With the inset maps in an A4 booklet, the exact scale was impossible to calculate.

	consultee			agent				
ID	**Given Name**	**Family Name**	**Company / Organisation**	**Given Name**	**Family Name**	**Company / Organisation**	**Proposals Map Changes - Question 19: Do you have any comments on the proposed amendments to the Proposals Map?**	**Council Response**
DCS71		Tilfen	Tilfen Land Ltd	Craig	Blatchford	Blue Sky Planning	Proposals Map We note that the existing Greenwich Unitary Development Plan Proposals Map will continue to form the basis of the Proposals Map subject to proposed changes. We have reviewed the UDP Proposals Map and the Draft Core Strategy Proposals Map-Proposed Changes and make the following representations. Representations in terms of the range of appropriate uses for the sites where we consider a change is appropriate are set out separately. In principle, Tilfen Land supports the site allocations/designations relating to land in its ownership and specifically the allocation of the following sites for development: - Land adjacent Broadwater Dock-h8 - Tear Drop site-j15 - Tripcock Point/Tamesis-mu40 - White Hart Triangle-j1 and j13 - Pettman Crescent-j16 - Thamesmead Town centre - Gallions Reach Local Centre - Tripcock Point School-cb4 The majority of the above sites are the subject of extant planning permissions which will form the basis for development and regeneration over the period of the Core Strategy. However, for the reasons set out below, it is considered that the Proposals Map and associated allocations reflect known and potential changes in circumstances which may arise over the period of the Core Strategy to ensure the greatest potential to deliver the proposals and the contributions that each site will make to the wider objectives for Woolwich/Thamesmead and north Greenwich as a whole. Gallions Reach Tilfen land supports the proposed changes to the designation of Gallions Reach from a Proposed Local Centre to a Local Centre. Tripcock Point/Tamesis The Proposals Map identifies Tripcock Point as Proposal Site mu40 and identifies the site for 'residential led mixed use development with ancillary local retailing and services, community and commercial uses'. Tripcock Point is a key site in the Council's strategy to deliver new housing in the area and continues to be highlighted in the draft Core Strategy (see below). Whilst the site is subject to an extant consent (Ref. No. 03/2618/O), one can foresee the need to review and update the proposed development over the lifetime of the Core Strategy reflecting changing commercial and other factors. Furthermore, the exact boundaries of the site (particularly the western boundary) may need to be reconsidered having regard to, inter alia, the waste management plan for LF3, etc. Therefore, we would suggest that the Proposals Map and associated site allocation should reflect this. Finally, we note that the Proposals Map Schedule refers to the Tripcock Point Development Framework SPG. This was adopted in 2003. Given the change in circumstances since the publication of the SPG, we consider that there may be a need to review the Development Framework. Therefore, we suggest that the reference to the Tripcock Point Development Framework, 2003 is either deleted or the text is amended to reflect the potential need to undertake a review. Pettman Crescent The Proposals Map includes Site Allocation j16 which relates to the south eastern portion of Pettman Crescent (recently developed for a McDonald's restaurant). Since the adoption of the UDP and the Proposals Map, the proposals for Pettman Crescent have evolved and there remains extant planning permission for a mixed hotel, trade counter and car wash development on the north east quadrant of the site at Pettman Crescent bounded by Pettman Crescent and to the north of the internal access road. We would suggest that the Proposals Map is revised to identify this area as being subject to	Support noted for Gallions Reach Local Centre. Much of these comments relate to site allocations in the existing UDP. As an update on progress of amending the site schedules, these will be updated/ amended if necessary through the Site Specific Allocations DPD. Consultation on a first draft of the new DPD will take place in early 2013. Subsequent to the consultation on the draft Core Strategy, an officer level meeting was held to further discuss these comments. The Council will continue to work with developers such as Telfin Land Ltd to ensure good quality development is delivered.

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							j16 [NB please let us know whether you require a plan to identify the land]. The existing UDP allocation (j16) identifies hotel, light industry, business and other non retail commercial uses as appropriate. We interpret non-retail commercial uses as including, inter alia, car showrooms, petrol filling stations, A3-A5 food and drink uses and other non B Class employment generating uses. If this interpretation is incorrect, we suggest that Policy j16 is revised to explicitly allow for the aforementioned development options. Thamesmere Drive Land at the end of Thamesmere Drive is identified as Site Allocation cb3. The site is identified for community use, possibly involving Town Centre uses and arising from the Tripcock Point permission/S106 agreement (see above). The S106 requires a study (a 'Community Services Study') to be undertaken to ascertain whether there is a need for a community use (s) on the site (in whole or part). If not, the site allocation indicates that 'Town Centre uses including residential and B1 (office) uses will be considered'. Given the site's location relative to Thamesmead Town Centre and the aspirations to improve the status and function of the Town Centre (i.e. Policy TC1 of the draft Core Strategy) we suggest that the site allocation is included within the wider Thamesmead Town Centre allocation and the site allocation should reflect a broader range of uses typically found in a Town Centre (i.e. retail, leisure, offices and other uses that attract and serve the public) as well as housing and community uses. Canal System, Area 6 The Proposals Map identifies the Canal System, Area 6 as o19. The site allocation indicates that this will form three functions- as a 'drainage canal' which will link the canal system in Area 6 to Thamesmere Extension lake in Area 4 via Twin Tumps; providing a setting for a footpath and cycle way link and providing ecological areas. Subject to detailed investigations, there is a significant possibility that there will not be a drainage need to link the two canal systems as proposed. Given the additional infrastructure costs arising (e.g. bridged access roads, etc) and the implications a canal link could have in terms of the planning and delivery of Tripcock Point (including in terms of viability and programme), it is suggested that the Proposals Map be amended to allow greater flexibility in relation to o19. It is acknowledged that there are benefits of delivering a link for pedestrians and cyclists and to deliver ecological improvements between Gallions Reach Urban Village and Thamesmead Town Centre within the wider area.. However, the site allocation should acknowledge that there may well not be a requirement to link the canal system in Area 6 to Tamesmere Extension Lake should it be demonstrated that there is no need to do so for drainage purposes. Tripcock Point School The Proposals Map Schedule identifies the Tripcock School Site as cb4 and a site area of 1.87 ha. The site identified for the School in the S106 agreement totals 1.53 ha. We suggest that the figure of 1.53ha is adopted. Tripcock Park West and Tripcock Park East The Proposals Map identifies Tripcock Park West as o15 and as land to the west of the proposed Thames Gateway Bridge. Tripcock Park East (o16) is not identified on the Proposals Map but is assumed to comprise land to the east of the proposed Thames Gateway Bridge. We recommend that the Proposals Map is amended to identify o16. Notwithstanding, we are of the opinion that the description of o15 and o16 as set out in the Proposal Map Schedule have been reversed (i.e. the	

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							description of o15 should be for o16 and vice versa). Therefore, we suggest that the Schedule is amended accordingly. In addition, we would draw attention to the following: Thamesmead River Bus The Proposals Map identifies a pier/shore facility in relation to the aspirations for a river bus to serve Thamesmead Town Centre and Tripcock Point (m8). In principle, Tilfen Land supports initiatives to improve the accessibility of the Thamesmead area by all modes of transport, including by the river. However, it is important to ensure that the potential to deliver the facility should be assessed having regards to the particular circumstances and characteristics, including viability issues, of the site. Crossrail We note that the Crossrail route/safeguarding land is identified on the UDP Proposals Map (m5) and there is no proposal to amend the designation. However, given the stage that the Crossrail project has reached in so far as it relates to land owned by Tilfen Land and specifically as construction and Compulsory Purchase Orders are progressing, we suggest that the designation should be updated.	
DCS87			Densitron Land Ltd	Andrew	Gale	Drivers Jonas Deliotte	Densitron note that there have been no changes proposed to the MOL boundaries at this stage of the document preparation from those that currently exist in the 2006 UDP Proposals Map for the borough. We consider the approach which LBG are adopting in preparing the CSDMP to result in an 'unsound' document. The draft CSDMP acknowledges that an open space assessment has yet to be completed and there is no evidence that a thorough review of existing MOL boundaries has been undertaken as part of this process. The draft policies within the CSDMP are therefore not based upon a robust and credible evidence base and, in light of this, we challenge the assertion that no revisions to MOL boundaries are required or necessary. We contend that a thorough review of MOL boundaries should be undertaken and where it can be demonstrated that circumstances have changed and a site no longer warrants designation as MOL then consideration must be given to are-designation. Densitron request that the Site referred to above be considered for removal from MOL designation for the reasons below. Land Use Turning to the specifics of our client's site, the site is in a poor state of repair and has been disused for approximately seven years. Prior to the recent arson and vandalism, development on site comprised a two-storey clubhouse, hard surfaced tennis courts and areas of hardstanding which were used in association with the land to the south. The land to the south was previously football and cricket pitches leased to the Old Addeyans' and accessed through the site. The clubhouse, car parking and tennis courts on the site were ancillary to these football and cricket pitches. A series of photographs of the Site and surroundings are enclosed. As previously stated Greenwich Council purchased the land to the south to facilitate redevelopment of the Thomas Tallis School. This has resulted in a direct severance in the ownership between the application site and the land to the south. A fence has now been erected along the line of ownership and the level of the land to the south has been reduced so that there is now a 1 metre high embankment at the edge of the Site down to the land now owned by the school, creating further physical	MOL boundaries were recently revised during the revision of UPD (adopted in 2006). Due to the long term nature of MOL designations a revision of MOL boundaries is not required at this stage. The majority of this submission relates to a particular piece of land adjacent to the Thomas Tallis School. Potential options for redeveloping the site are limited by the intention for the MOL designation to remain. The importance of MOL to the borough and London as a whole is set on in the Core Strategy and in the London Plan.

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							separation. This fundamental change executed by LBG, clearly prevents the Site from performing its original use. LBG are currently redeveloping the football and cricket pitches that were previously to the south of the Site for a complex of sporting facilities including significant areas of hard standing, flood lighting and supporting infrastructure and equipment. These will be accessed directly from the new school buildings currently being constructed to the south east of the site by a new bridge constructed over Kid Brook. On the basis of the above, the Site is redundant from its former use as a clubhouse and sports facility associated with the land to the south. Local Policy Designation The Site is identified on the adopted UDP Proposals Map as part of MOL, and this designation is proposed to be continued in the Core Strategy with Development Management Policies. The current London Plan Consolidated with Alterations since 2004 (2008) states that MOL is defined in regional and local policy by its "predominantly open character" and the role it plays in "breaking up built up areas" and its intrinsic qualities of 'openness' and 'greenness'. Densitron contend that a number of significant changes have occurred to the status of the Site since its use was last assessed through the UDP review. These are listed as follows: • The application site has been separated both physically and by ownership from the playing fields to the south and is now incapable of performing its previous use; • The residential bungalow adjacent to the site is within the defined MOL boundary, but was recently granted planning permission for an extension to it's footprint; • The land to the south has been redeveloped for use by Thomas Tallis School which includes an intensification of use, significant areas of hardstanding, fencing and proposals for floodlighting, thus compromising the overall value of the MOL; • The site was presumably only ever designated as MOL due to it comprising part of the larger playing field area to the south. Now its previous use has ceased and it is physically separated from the land to the south there is no justification in retaining that status as it is no longer ancillary to any MOL; • Further substantial areas of the MOL have been released for housing development, associated with the Kidbrooke Masterplan, and redevelopment of the school and a very large warehouse has also been constructed to the southwest of the application site, immediately adjacent to the MOL. These changes compromise the openness and setting of the location; • The tennis courts have not been used and have lain redundant for approximately 7 years, approximately 5 years since the last review of land use policy; and; • The application site has been subject to frequent vandalism and has fallen into disrepair creating a negative impact upon the surrounding area. Consideration also needs to be given to the Site's connection and association with adjacent sites and large open areas that are created cumulatively, as well as views into and out of the wider area. The land adjacent to the southern boundary of the Site is currently being developed as new floodlit hard surface sports pitches and outdoor sports facilities as part of the Thomas Tallis school redevelopment. Although playing fields and sports	

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							facilities are an accepted use for MOL, a perimeter fence is being erected around the school sports facilities, denying public access and informal enjoyment of the space. It should also be recognised that the intensification of development that will result from the school redevelopment is significant. The floodlit hard-surface multi-use games area that will be constructed directly to the south of the Site as part of the Thomas Tallis School redevelopment, the operation of which into the evening will have adverse effects on views across the MOL and will significantly intensify its use in the evening. It is considered that this development will compromise the quality and purpose of the MOL designation. Floodlit hard surface pitches and the many ancillary installations that go with them clearly compromise the concepts of openness and greenness embodied in the concept of MOL. Another factor affecting views into and out of the MOL is the recently constructed large industrial warehouse situated on Old Post Office Lane. This significant structure, erected immediately adjacent to the MOL quite evidently dominates views to the south and west from Densitron's site and clearly compromises the open nature of the site. Taken together, the factors listed above have resulted in the fragmentation and shrinking of the MOL in the area to the point where what is left of the Site is, in our view, of no value to the defined purposes of MOL as established in the London Plan and Draft Replacement London Plan. By reference to the relevant development plan policies, in our view the MOL no longer represents: • Land that contributes to the physical structure of London by being clearly distinguishable from the built-up area; • Land that includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole or significant parts of London; • Land that contains features or landscape of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level; and • Land that forms part of a Green Chain and meets one of the above criteria. The site itself has been subjected to repeated acts of vandalism and it has been necessary to erect hoardings around the site to reduce the prospects of further incidents. The hoardings are necessary but detract from the street scene of Blackheath Park and, to an extent, the views north and south into and through the MOL. Removing the Site from the MOL would offer the opportunity to create itself a natural defensible boundary that would clearly separate the playing field and education facilities from the surrounding residential use to the north. This wou ld also allow potential for a sensitive form of development in keeping with the Blackheath Park Conservation Area, which in itself offers LBG control over the form and quality of development. Such an approach would allow a redundant site to come back into a beneficial use in keeping with its surroundings, whilst retaining a defensible area of open space to the south which can be used for leisure and educational purposes, without the need for crime prevention measures that have been put in place to prevent antisocial behaviour. When analysed holistically with the areas to the south and west,	

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							it is our view that the Site contributes little, or most probably nothing, towards the purpose of MOL in providing a "predominantly open character" and "breaking up built up areas" and any intrinsic qualities of 'openness' and 'greenness' it may have been compromised particularly since its separation, in both ownership and activity, from the wider area of land to the South. The Site is divided up into sections by the perimeter fencing of the tennis courts and related vegetation which further reduces both the 'openness' and 'greenness' of the land. This is made apparent when standing in the centre of the site by the feeling that the tennis courts are part of a different site altogether, detached and divided off from the rest of the area. The courts have been disused for some time and are unmaintained, acting as an area of undesirable overgrown concrete fenced off from public access or use. Since the Council's purchase of the land to the south and the subsequent erection of hoardings around the Site, there have been reports of persistent antisocial behaviour on the site resulting in littering, damage to neighbouring property and an arson attack causing significant fire damage to the clubhouse building. The results of this activity along with the boarding up of the site also undermines any contribution it could make to a wider MOL. It would appear that the manner by which Greenwich Council has sought to designate nearly all open spaces as MOL does not stand a reasonable test against how other London boroughs do, e.g. Westminster. For example, Westminster adopt a much more pragmatic approach whereby only strategically significant open areas, e.g. Royal Parks, are afforded the MOL status, whilst more secondary areas are typically protected through open space policies.	
DCS78		Berkeley Homes	Berkeley Homes (Urban Developments) Ltd	Bob	McCurry	Barton Willmore	Kidbrooke Development Area 6.1 As set out above in paragraph 3.9, we note that the Council's intention is to delete the Kidbrooke Development Area (KDA) from the Proposals Map. 6.2 We object to this proposal for the following reasons: ïƒ˜ Firstly, we are very concerned that the proposed deletion has been suggested without any form of justification being provided. ïƒ˜ Secondly, given that the Draft Core strategy identifies Kidbrooke as a Strategic Development Location, we would expect the allocation of this locality as a Development Area to be retained within the UDP Proposals Map. ïƒ˜ Thirdly, although part of the KDA has planning permission and is under construction, the overall redevelopment of the area will take in the region of 20 years and consists of some sites that do not currently have a planning permission for redevelopment. We would therefore expect the allocation of the KDA to remain in order to provide a supportive planning context to any future applications and redevelopment proposals that come forward in the area, at least until the target 4,800 residential units have been constructed and delivered to the housing market. Sutcliffe Park Local Nature Reserve 6.3 We note that allocation on Sutcliffe Park (Map 15), Kidbrooke, has been amended from a Site of Nature Conservation Importance to a Local Nature Reserve. 6.4 Having checked Natural England's website, they also allocate Sutcliffe Park as a Local Nature Reserve, which is a non-statutory designated site. 6.5 Our understanding is that this is a local allocation and there is no intention to allocate Sutcliffe Park on the statutory list of designated sites. Clarification from the	Agreed regarding the importance of retaining Kidbrooke designation on Proposals Maps. It has been updated to reflect the new terminology and the designation of Kidbrooke as a Strategic Development Location is now reflected in the Proposals Maps. Community Open Space does not have to have public access and therefore the area of open space at the Royal Arsenal can be designated as Community Open Space. Sutcliffe park has been designated as a Local Nature Reserve in addition to its designation as a Site of Nature Conservation Importance (NC41).

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							Council on this point would be welcome. Community Open Space - Royal Arsenal 6.6 We note that the open space at Royal Arsenal (Map 13), Woolwich, has been allocated as Community Open Space. 6.7 However, please note that the S106 Agreement linked to the relevant planning permission for Building 22 (adjacent to the open space) contains a clause allowing Berkeley Homes to close off this land for 1 day a year to stop the site becoming 'public land'. This may have an impact on the allocation of the site as Community Open Space and we would therefore urge the Council to clarify this situation before proceeding.	

Question 20- Sustainability Appraisal

ID	Given Name	Family Name	Company / Organisation	Sustainability Appraisal - Question 20: Do you have any comments on the Sustainability Appraisal?	Council Response
DCS24	John	Franklin	Greenwich Society	RELATING TO TOWN CENTRES POLICIES The key findings of the Sustainability Appraisal: Second para: It is considered that the town centre policies will result in positive effects on enhancing the area as both business and tourism destinations (SA Objective 9). Whilst the claim about tourism is manifestly true in respect of Greenwich TC and North Greenwich, we would submit that it is wholly unrealistic in respect of East Greenwich. Third para: Any adverse effects emanating from an increased number of tourists in Greenwich Town Centre can be addressed by onsite management and street services. What does this mean? What management and what services? Provided by whom? And (if provided by the Council) how, particularly in the foreseeable economic climate? Fourth para: By concentrating new jobs and commercial activities in town centres, such as Woolwich, Greenwich Peninsula and Greenwich Town Centre, perception of crime should be minimised (SA Objective 2), due to increased activity, especially such activity that supports day and night time operational hours. This is an over-simplification. Both the perception and fact of crime (including anti-social behaviour) is strongly influenced by the nature of the economic activity in the relevant location, particularly in respect of night-time activity. Sixth para: Rejuvenated town centres will generate more waste as they attract more people and commercial activity to the centres. However, it is considered that adverse effects in terms of waste will be mitigated effectively by the Council's current recycling and waste collection, street cleaning services. This is directly related to the wider question of the pressures upon infrastructure provision (in this case service infrastructure) relating to the extensive general development of Greenwich SE10. Will the Council's resources be capable of meeting this challenge to achieve the quoted assertion? Seventh para: It is considered that the town centre policies will likely have positive effects on reducing the need to travel (SA Objective 13). This is because the town centre policies offer liveable centres that seek to attract levels of commercial development, services and facilities that are relative to the type of town centre which enable reduced travel requirements. The development of North Greenwich will obviously create new jobs. But the quoted aspiration ignores the obvious fact that the thousands of new residents of the Peninsula will not all find work locally; and thus, the net effect will not be to reduce the need to travel but quite the opposite. The planned developments at Greenwich Reach and the New Heart of East Greenwich may have some small effect to this end, but the limited remaining scope for development in the vicinity of the TCs in our area make this claim highly questionable. Eighth para: The town centres policies seek to improve the environment for pedestrians and cyclists and reduce traffic impact, (SA Objective 14). This has been an unfulfilled aspiration for very many years. Part pedestrianisation of the Greenwich TC is currently the subject of Council proposals and consultation. The current scheme has serious flaws which have been voiced by the Society. Separately, how is the aim to be achieved in East Greenwich?	As a general point, the Sustainability Appraisal on the Submission Version of the Core Strategy is completely new and reworked since the SA on the Draft Core Strategy. It is certainly recognised that the current economic climate limits resources and reduces the amount of funding available. All of the points raised have been considered when drafting this Sustainability Appraisal.
DCS25		Waite		a) was the 'key data' identified as 'missing' in the 2008 draft identified and factored in? b) if the core strategy cannot be delivered as envisaged, there is surely a danger of piecemeal development all over the borough, with threats to quality of life , the environment and biodiversity. c) who is the 'critical friend' mentioned? (non-technical summary p.8)	a) All the relevant data was included in the latest draft. b) Noted. c) The "critical friend" was Land Use Consultants.
DCS60	Lawrence	Smith	Westcombe Society	WS would like to know the criteria for sustainability used in this appraisal and whether it was carried out independently.	The definition of sustainability for the purposes of this appraisal encompasses the five guiding principles of the UK

					Government Sustainability Strategy (2005) as set out in Introduction to the appraisal. The appraisal was carried out by a member of the Council's Sustainability Team. This team is separate from the Planning Policy Team.
DCS84	Anna	Townend	Greenwich Environment Forum	We await the full Technical Appraisal - The summary is not adequate.	The Sustainability Appraisal, the Non-Technical Summary and key findings were available in November 2010. This is considered to be adequate.
DCS86	Claire	Craig	English Heritage - London Region	Characterisation and SA Framework English Heritage welcomes the inclusion of the Built Environment as a Key Sustainability Issue for the London Borough of Greenwich in Table 3 on pages 19 and 20. We also support sustainability objectives 3, 4, 11, and 15 concerning heritage assets, places and spaces, sense of place and open spaces respectively. We would note that in order to align Sustainability Objective 3 more effectively with PPS 5 it would be preferable to substitute the word 'conserve' for the word 'preserve' and the phrase 'heritage assets' in place of 'areas and buildings'. In general terms, the structure of the Draft Sustainability Appraisal (SA) should provide a robust analysis of the impact of the plan on the Borough's environment. On the face of it, there is relatively good inclusion of the historic environment throughout the SA. It is still, however, difficult to understand the answer to some key questions that concern the outcome of the plan for the Borough's heritage assets. The principal example of this is whether the preferred or alternative option put forward for the plan presents a bigger impact on the historic environment of Greenwich. The preferred option would seem to create greater pressure for development, particularly in Charlton Riverside, but it is not possible to tell whether or not this will result in the loss or degradation of more heritage assets than the alternative option that involves less development pressure. We note that the alternative options summary on page 70 discusses a slower rate of growth in relationship to the historic environment and concludes that this will not necessarily make any difference to heritage and archaeology. It would be helpful to understand how this conclusion has been arrived at. On the face of it, a reasonable alternative that does not appear to have been explored is the location of housing in other parts of the borough. A piece of baseline evidence looking at the character of the borough would provide strong support for housing location choices and enable alternatives to be discussed in terms of the historic environment with a fuller justification. Appraisal of the Draft Core Strategy English Heritage welcomes the recognition of the connection between employment and tourism, and the link between tourism and the sustainability of the Borough's heritage assets. While it is generally our view that the Maritime Greenwich World Heritage Site is robust, it is an important element of the long-term sustainability of this invaluable asset that its use, and demand for access to it, is appropriately monitored and managed. We note the indication in paragraph 5.3.3.18 that such things can be appropriately mitigated and managed outside of the Core Strategy remit. We are of the view, however, that if the Core Strategy is to have a policy focusing on increasing the use of the asset then it should also monitor the impact that policy has on that asset. Heritage at Risk may provide an appropriate vehicle for achieving this and therefore it might not be a case of developing a new indicator but rather interrogating the same indicator for links to assets that are being targeted for greater use through the tourism policy. Table 6 on pages 30-32 suggests that there is no relationship between heritage and the following matters: housing, transport, water, low carbon, urban design, economy, employment, education, waste, open spaces and flood risk. Our Historic Environment: Local Management (HELM) website (www.helm.org.uk) includes a range of guidance on nearly all of these subject matters extensively indicating how they impact upon heritage. To highlight just some of the key relationships: the need to locate new housing raises the prospect of integration with the historic environment; it may lead to the degradation of the setting of key heritage assets depending on the form and density that it takes. In addition, when heritage assets in the form of designated buildings are demolished in order to make way for new buildings, this increases levels of construction waste, which form the largest contribution to London's waste production. Therefore, the adaptive re-use and full occupancy of historic buildings has an important relationship with the issue of waste. Many heritage assets are open spaces; tourism, a critical component of the Borough's economy is largely predicated on visits to heritage assets; and so on. There is some acknowledgement of some of these connections in the Reasonable Alternatives portion of the Historic and Archaeological Interest section of the SA but this has not been worked back through to this matrix and we would recommend that it is. Otherwise these connections appear largely unacknowledged by the SA and it may not be sufficiently robust in respect of heritage. The same table (Table 6) has identified the relationship between infrastructure and climate change and heritage as uncertain. In these matters the analysis is reasonable, although the climate change section could include more of a focus on developing understanding of the feasibility of district network schemes, especially given the content of the Mayor's Draft Climate Change Mitigation and Energy Strategy. Such networks could alleviate some of the need for more immediate impacts on heritage assets such as the installation of micro-renewable technologies. In its current form, Table 8, on pages 45-48 struggles to convey meaning accessibly. The headings for the Core Strategy policies at least need to be indicated or it is not possible to ascertain what is being evaluated without a relatively complex cross-referencing exercise. The numbers for the Sustainability Objectives should be rolled over on to each page for accessibility as well. English Heritage welcomes the recognition that a spatial strategy specific to Greenwich is desirable in respect of tall building location - see paragraph 5.3.3.15 on page 68. This has not, however, been followed through as a recommendation in Table 11 on page 178 and we would suggest that it is. The list of indicators concerning the Historic and Archaeological Interest section of the SA needs to be updated to refer to heritage assets at risk and our Heritage at Risk Register rather than simply listed buildings at risk. We would also be grateful if you could clarify what Archaeological Assessment Statements are as this is not commonly used terminology according to the Greater London Archaeological Advisory Service (GLAAS). Are they Character Descriptions of Archaeological Priority Areas? English Heritage recommends that PPS 5 is included in the list of national level policies in the section concerning Places, Spaces and Buildings. In addition, we note that the only indicators given in this section relate to flood risk and transport infrastructure. English Heritage recommends that consideration is given to developing a more qualitative indicator in respect of design in order to ensure that design-based mitigation is actually being achieved. English Heritage recommends that PPS 5 is included in the list of national level policies in the section concerning Sense of Place, Community Identity and Belonging on page 116. We welcome the recognition, in paragraph 5.3.10.11, of the link between heritage and sense of place, community identity and belonging but believe that it could be stated with more confidence as an actuality rather than something potential. We recommend the inclusion of Heritage at Risk as an indicator in this section as we are of the view that well maintained heritage assets contribute to a positive sense of place, community identity and belonging. As discussed above, the sections concerning waste, climate change and open space do not acknowledge their relationship to heritage and yet there are important interactions between these topics. English Heritage requests that	As a general point, the Sustainability Appraisal on the Submission Version of the Core Strategy is completely new and reworked since the SA on the Draft Core Strategy. It is believed that the Sustainability Appraisal on the Draft Core Strategy provided a sufficiently robust assessment of the impact on heritage assets of the proposed and alternative strategies. The new Sustainability Appraisal on the proposed submission version is stronger again. It is also worth noting that subsequent to the consultation on the Draft Core Strategy that a number of discussions have been held between Council officer and English Heritage on matters such as the Tall Buildings Assessment. These have been valuable in finalising the Core Strategy and SA.

				the borough revisit these sections of the SA to consider potential impacts and policies more closely. For example, in order to combat the problem of construction waste, some places have begun to look more closely at the link between vacancy rates in houses, offices and retail spaces. Heritage assets, in the form of listed buildings, can accommodate these types of uses and the borough might benefit from considering what can be done to ensure that heritage assets are fully utilised in order to support waste reduction. Summary and Conclusions English Heritage is very concerned at the apparent assertion in paragraph 6.0.2 on page 176 that the Borough's entire historic environment lies in Greenwich alone. This is very clearly not the case, perhaps most obviously with the Grade I Eltham Palace in Eltham and part of Blackheath being in the Borough's jurisdiction. Unfortunately, this gives the impression that heritage might not have been considered beyond Greenwich. This underlines the need for a baseline piece of evidence that incorporates the heritage designations across the Borough with a study of the Borough's character. Such a study would provide evidence that a full understanding of the Borough's heritage had contributed to proposed site allocations for housing and tall buildings in particular, and to the development of strategy for the Borough's future direction. English Heritage notes that Table 11 on page 178 indicates that the SA has made no difference in respect of heritage, as the score is the same with or without the SA recommendations. While it is clear from the ++ score that it is the Borough's view that the treatment of heritage throughout the plan is very positive, English Heritage would welcome more evidence that this assessment is based on full consideration of all of the Borough's heritage assets in the context of all of the elements of the Core Strategy. As set out above there are entire subject areas that do not appear to have been analysed in respect of heritage and a disconcerting suggestion that the majority of the Borough has been assessed as being devoid of heritage. In order to overcome this, we recommend that the Borough include evidence of baseline information about heritage that goes beyond the statistical list to show where heritage is in the Borough and how this is impacted upon by the Core Strategy's proposals. This might take the form of mapping and character descriptions that incorporate identification of whether there is any heritage in the area or not. It could most readily be achieved through a borough-wide character study in accordance with our and CABE's Guidance on Tall Buildings (July, 2007).	