

**Appendix 26: Statement of Representations; Proposed Submission Version Core Strategy with Development Management Policies Consultation Responses Report**

Title	Number	Person ID	Full Name	Is the DPD legally compliant?	Is the DPD sound?	Reasons for legal compliance and soundness	Changes necessary for legal compliance and soundness	Agent ID	Full Name	Organisa tion Details	Comment ID
Core Strategy with Development Management Policies (Proposed Submission Version)		757514	RAGED Residents  RAGED  RAGED	No	No	<p>The Boroughs Core Strategy does not comply with or reflect satisfactorily the following National Planning Policy Framework Requirements. Particularly in relation to its Open Space Policy. However, in general these National Planning Policies Framework requirements, listed below, are not integrated and properly reflected in the Core Strategy Document set:-</p> <p>National Planning Policy Framework -</p> <p>8. Promoting healthy communities</p> <p>69.</p> <p>●● safe and accessible environments where crime and disorder, and the fear</p> <p>of crime, do not undermine quality of life or community cohesion; and</p> <p>●● Safe and accessible pedestrian</p> <p>routes, and high quality public space, which encourage the active and</p> <p>continual use of public areas.</p> <p>70. To deliver the social, recreational and cultural facilities and services the</p> <p>community needs, planning policies and decisions should:</p> <p>●● plan positively for the provision and use of shared space, community</p> <p>facilities (such as meeting places, sports venues) to enhance the sustainability of communities and residential environments;</p> <p>●● guard against the unnecessary loss of valued facilities and services,</p> <p>particularly where this would reduce the community’s ability to meet its</p> <p>day-to-day needs;</p> <p>●● ensure that established facilities and services are able to develop</p>	<p>The Boroughs Core Strategy document should be made to comply with and reflect satisfactorily the following National Planning Policy Framework Requirements. Particularly in relation to its Open Space Policy. However, in general these National Planning Policies Framework requirements, listed below, are not integrated and properly reflected in the Core Strategy Document set.</p> <p>Every one of these National Planning Policies Framework requirements should be explicitly enacted and documented in the Core Strategy before it is approved for publication :-</p> <p>National Planning Policy Framework -</p> <p>8. Promoting healthy communities</p> <p>69.</p> <p>●● safe and accessible environments where crime and disorder, and the fear</p> <p>of crime, do not undermine quality of life or community cohesion; and</p> <p>●● Safe and accessible pedestrian</p> <p>routes, and high quality public space, which encourage the active and</p> <p>continual use of public areas.</p> <p>70. To deliver the social, recreational and cultural facilities and services the</p> <p>community needs, planning policies and decisions should:</p> <p>●● plan positively for the provision and use of shared space, community</p> <p>facilities (such as meeting places, sports venues) to enhance the sustainability of communities and residential environments;</p> <p>●● guard against the unnecessary loss of valued facilities and services,</p>			<a href="#">25</a>	

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						<p>and modernise in a way that is sustainable, and retained for the benefit of</p> <p>the community; and</p> <p>●● ensure an integrated approach to considering the location of community facilities and services.</p> <p>(Note to 73 :- That the present Planning policies are not based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision). (Present plans and supporting documents are at least 5 years old).</p> <p>73. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of</p> <p>communities. Planning policies should be based on robust and up-to-date</p> <p>assessments of the needs for open space, sports and recreation facilities and</p> <p>opportunities for new provision. The assessments should identify specific</p> <p>needs and quantitative or qualitative deficits or surpluses of open space,</p> <p>sports and recreational facilities in the local area. Information gained from</p> <p>the assessments should be used to determine what open space, sports and</p> <p>recreational provision is required.</p> <p>74. Existing open space, sports and recreational buildings and land, including</p> <p>playing fields, should not be built on unless:</p> <p>●● an assessment has been undertaken which has clearly shown the open</p> <p>space, buildings or land to be surplus to requirements; or</p> <p>●● the loss resulting from the proposed development would be replaced by</p>	<p>particularly where this would reduce the community's ability to meet its</p> <p>day-to-day needs;</p> <p>●● ensure that established facilities and services are able to develop</p> <p>and modernise in a way that is sustainable, and retained for the benefit of</p> <p>the community; and</p> <p>●● ensure an integrated approach to considering the location of community facilities and services.</p> <p>(Note to 73 :- That the present Planning policies are not based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision). (Present plans and supporting documents are at least 5 years old).</p> <p>73. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of</p> <p>communities. Planning policies should be based on robust and up-to-date</p> <p>assessments of the needs for open space, sports and recreation facilities and</p> <p>opportunities for new provision. The assessments should identify specific</p> <p>needs and quantitative or qualitative deficits or surpluses of open space,</p> <p>sports and recreational facilities in the local area. Information gained from</p> <p>the assessments should be used to determine what open space, sports and</p> <p>recreational provision is required.</p> <p>74. Existing open space, sports and recreational buildings and land, including</p>				

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						<p>equivalent or better provision in terms of quantity and quality in a suitable location; or</p> <p>●● the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</p> <p>76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them.</p> <p>By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.</p> <p>77. The Local Green Space designation areas or open space. The designation should only be used:</p> <p>●● where the green space is in reasonably close proximity to the community it serves;</p> <p>●● where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p> <p>●● where the green area concerned is local in character and is not an extensive tract of land.</p> <p>78. Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts.</p> <p>(Note: The provision of Metropolitan Open Land,</p>	<p>playing fields, should not be built on unless:</p> <p>●● an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</p> <p>●● the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</p> <p>●● the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</p> <p>76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them.</p> <p>By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.</p> <p>77. The Local Green Space designation areas or open space. The designation should only be used:</p> <p>●● where the green space is in reasonably close proximity to the community it serves;</p> <p>●● where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p>				

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						<p>Community Open Space and other Public and Open Space in the Borough should be considered as an existing Green Belt. These policies should therefore be applicable to the Borough’s Open Space and reflected more fully in the Core Strategy).</p> <p>9. Protecting Green Belt land</p> <p>79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.</p> <p>80. Green Belt serves purposes:</p> <ul style="list-style-type: none"><li>●● to check the unrestricted sprawl of large built-up areas;</li><li>●● to preserve the setting and special character of historic towns; and</li><li>●● to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li></ul> <p>81. Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.</p> <p>82. The general extent of Green Belts across the country is already established.</p> <p>83. Local planning authorities with Green Belts in their area should establish</p> <p>Green Belt boundaries in their Local Plans which set the framework for Green</p> <p>Belt and settlement policy. Once established, Green Belt boundaries should</p>	<p>●● where the green area concerned is local in character and is not an extensive tract of land.</p> <p>78. Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts.</p> <p>(Note: The provision of Metropolitan Open Land, Community Open Space and other Public and Open Space in the Borough should be considered as an existing Green Belt. These policies should therefore be applicable to the Borough’s Open Space and reflected more fully in the Core Strategy).</p> <p>9. Protecting Green Belt land</p> <p>79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.</p> <p>80. Green Belt serves purposes:</p> <ul style="list-style-type: none"><li>●● to check the unrestricted sprawl of large built-up areas;</li><li>●● to preserve the setting and special character of historic towns; and</li><li>●● to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li></ul> <p>81. Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged</p>				

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						<p>only be altered in exceptional circumstances, through the preparation or</p> <p>review of the Local Plan. At that time, authorities should consider the Green</p> <p>Belt boundaries having regard to their intended permanence in the long</p> <p>term, so that they should be capable of enduring beyond the plan period.</p> <p>87. As with previous Green Belt policy, inappropriate development is, by</p> <p>definition, harmful to the Green Belt and should not be approved except in</p> <p>very special circumstances.</p> <p>88. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly</p> <p>outweighed by other considerations.</p> <p>89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:</p> <ul style="list-style-type: none"> <li>●● provision of appropriate facilities for outdoor sport, outdoor recreation</li> </ul> <p>and for cemeteries, as long as it preserves the openness of the Green Belt</p> <p>and does not conflict with the purposes of including land within it;</p> <ul style="list-style-type: none"> <li>●● limited infilling or the partial or complete redevelopment of previously</li> </ul> <p>developed sites (brownfield land)</p>	<p>and derelict land.</p> <p>82. The general extent of Green Belts across the country is already established.</p> <p>83. Local planning authorities with Green Belts in their area should establish</p> <p>Green Belt boundaries in their Local Plans which set the framework for Green</p> <p>Belt and settlement policy. Once established, Green Belt boundaries should</p> <p>only be altered in exceptional circumstances, through the preparation or</p> <p>review of the Local Plan. At that time, authorities should consider the Green</p> <p>Belt boundaries having regard to their intended permanence in the long</p> <p>term, so that they should be capable of enduring beyond the plan period.</p> <p>87. As with previous Green Belt policy, inappropriate development is, by</p> <p>definition, harmful to the Green Belt and should not be approved except in</p> <p>very special circumstances.</p> <p>88. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly</p> <p>outweighed by other considerations.</p> <p>89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:</p> <ul style="list-style-type: none"> <li>●● provision of appropriate facilities for outdoor sport, outdoor recreation</li> </ul>				

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							<p>and for cemeteries, as long as it preserves the openness of the Green Belt</p> <p>and does not conflict with the purposes of including land within it;</p> <p>●● limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land)</p>				
Key Diagram		630863	Transport for London	Not specified	Not specified	<p>TfL requests that a revised Key Diagram is submitted given issues of clarity in</p> <p>the consultation draft, to ensure TfL can comment on any specific proposals</p> <p>arising from the diagram, which may impact transport infrastructure or service operations.</p>					<a href="#">61</a>
Core Strategy with Development Management Policies (Proposed Submission Version)		147516	Unknown	Not specified	Not specified	We have reviewed the consultations and do not have any comment at this time					<a href="#">102</a>
Core Strategy with Development Management Policies (Proposed Submission Version)		758828	Angela Atkinson	Yes	Yes	Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. The MMO has no objections to raise in relation to these documents. We would however like to draw attention to particular areas of our work which are relevant to the above documents.					<a href="#">115</a>

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n)											
Core Strategy with Development Management Policies (Proposed Submission Version)		147465	Graham Saunders								<a href="#">579</a>
Core Strategy with Development Management Policies (Proposed Submission Version)		147468	Mr David Hammond								<a href="#">584</a>
Core Strategy with Development Management Policies (Proposed Submission Version)		147485		Not specified	Not specified						<a href="#">582</a>
Core Strategy with		147498						188158	Mr Mark	Assistant Director	<a href="#">554</a>

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Submission Version)											
Core Strategy with Development Management Policies (Proposed Submission Version)		147829	Ms Anna Townend								<a href="#">551</a>
Core Strategy with Development Management Policies (Proposed Submission Version)		148036	Ms Jenny Bates								<a href="#">536</a>
Core Strategy with Development Management Policies (Proposed Submission Version)		148127	WM Morrison Supermarkets Plc					267475		Peacock and Smith Limited	<a href="#">538</a>

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Core Strategy with Development Management Policies (Proposed Submission Version)		148268	Mr and Mrs Yodry Vasquez								<a href="#">549</a>
Core Strategy with Development Management Policies (Proposed Submission Version)		148404	Mr Terry Powley								<a href="#">577</a>
Core Strategy with Development Management Policies (Proposed Submission Version)		148409	Ms Rose Freeman								<a href="#">574</a>
Core Strategy with Develo		148451	Tilfen					382433	Mr Craig	Blue Sky Planning	<a href="#">565</a>

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pment Management Policies (Proposed Submission Version)									Blatchford		
Core Strategy with Development Management Policies (Proposed Submission Version)		148482	Ms Judith Cooke	Yes	Yes	<p>Having been fully involved in the previous consultations, we are satisfied that our comments have been incorporated in the proposed submission document.</p> <p>The Royal Greenwich Core Strategy with Development Management Policies (Proposed Submission Version) appears to be founded on robust and credible evidence base. The Environment Agency notes that the findings of the Sustainability Appraisal have been reflected in the document and used to inform the policies.</p> <p>It is our considered opinion the Core Strategy with Development Management Policies (Proposed Submission Version) complies with the legal requirements and appears ‘sound’. It meets the requirements of the Planning and Compulsory Purchase Act 2004 and appears to have been positively prepared, justified, effective and consistent with national policy.</p>				<a href="#">590</a>	
Core Strategy with Development Management Policies (Proposed Submission Version)		148486	Ms Wendy Shelton	Not specified	Not specified	<p>Concluding comments</p> <p>1. Glossary - while the inclusion of a glossary in the document is essential, we also consider that there should be an alphabetical index of all the various guidance documents to which there are references throughout the core strategy document whether they are produced by the Royal Borough, the Mayor of London’s office or Central Government and other national organisations - with title references and dates of publication.</p> <p>2. We consider that the Core Strategy should include a reference to “Permitted Development” particularly with regard to home extensions, telecommunications installations and installations aimed at achieving energy efficiency. In respect of permitted development for residential extensions, we have been made aware through recent decisions taken both at officer level and at Committee level that, provided such extensions satisfy the mathematical criteria in terms of height and forward projection beyond the rear building line, they are being approved despite the fact that UDP policies</p>				<a href="#">228</a>	

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						D1, D16 and 10 in respect of adverse impact on the quality of life for those in neighbouring properties are being breached. There is an obvious conflict here which needs to be resolved.  3. We also ask that consideration be given to introducing into the Core Strategy some reference to the recently published guidance on Larger Home Extensions: Neighbour Consultation Scheme. DCLG memorandum dated 9 May 2013 refers.					
Core Strategy with Development Management Policies (Proposed Submission Version)		148496	Mr Frank King								<a href="#">532</a>
Core Strategy with Development Management Policies (Proposed Submission Version)		166965	Berkeley Homes					188419	Mr Bob McCurry	Senior Planner Barton Willmore	<a href="#">542</a>
Core Strategy with Development Management Policies		166972	Cathedral Group					188810		Nathaniel Lichfield and Partners	<a href="#">526</a>

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(Proposed Submission Version)											
Core Strategy with Development Management Policies (Proposed Submission Version)		501408	Mr John Franklin	Not specified	Not specified	As the Statement of Community Involvement says, “resourcing consultation activities is important if the Council is to achieve the consultation standards set out in this document”. More broadly, implementation of the strategy is a massive task which will not be achieved unless it is properly resourced and the Council’s planning department fully staffed with effective officers, with the confidence to make it happen.	At a time when the Council is under financial pressure, there needs to be an explicit commitment in the Core strategy document. We consider that the a new section should be added, with a Council undertaking to give priority to the provision of adequate funding and staffing to implement the strategy, as a massive task which will require a fully staffed and effective planning department.				<a href="#">149</a>
Eltham Town Centre		760183	Cllr Spencer Drury	Not specified	Not specified	<p>While it is hard to disagree with the general statements that Eltham Town Centre will continue to be an important retail location or that it will see “its existing character largely retained and enhanced” we are concerned about the details contained in the Eltham Town Centre Masterplan, which seems to have been adopted in haste and without proper consultation with businesses, residents or other stakeholders. In our opinion, the focus on building large blocks of flats in place of businesses is unlikely to retain Eltham’s character or indeed its position as an ‘important retail location’.</p> <p>With regard to the mention of improved transport links for Eltham and Kidbrooke in this section, there seems to be a failure to recognise that longer trains or an improved service on the existing lines are essential for the future.</p> <p>It is also the case that the failure to specifically outline plans for New Eltham means that this document is incomplete and reflects a failure to treat the South of the Borough seriously.</p>				<a href="#">312</a>	
Core Strategy with Development Management		166972	Cathedral Group					228178	Ms Diana Thomson	GVA Grimley	<a href="#">530</a>

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s (Proposed Submission Version)											
Core Strategy with Development Management Policies (Proposed Submission Version)		626561	Mr Paul McQuillen								<a href="#">567</a>
Core Strategy with Development Management Policies (Proposed Submission Version)		628576	Mr Roy Tindle								<a href="#">578</a>
Core Strategy with Development Management Policies (Proposed Submission Version)		630659						630643	Ms Karen Calkin	Associate R P S Group plc	<a href="#">575</a>

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Management Policies (Proposed Submission Version)											
Core Strategy with Development Management Policies (Proposed Submission Version)		755935						755933	Mr Mark Novelle	Planning Deloitte Real Estate	<a href="#">545</a>
Core Strategy with Development Management Policies (Proposed Submission Version)		756163	Mr Dionysius De Silva								<a href="#">534</a>
Core Strategy with Development Management Policies		756674						756671	Mrs Sarah Moorhouse	Associate Director Nathaniel Lichfield & Partners	<a href="#">533</a>

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Development Management Policies (Proposed Submission Version)			Elson								
Core Strategy with Development Management Policies (Proposed Submission Version)		763263						188443	Mr Brian Coughlan	CGMS Consulting	<a href="#">525</a>
Paragraph	1.1.1	757304	Mr Ken Hobday	Yes	No	I do not believe the Draft Core Strategy is sound as the Draft Core Strategy does not in my view support Sustainability, or protect and enhance the environment as it claims to.					<a href="#">31</a>
Paragraph	1.1.2	757304	Mr Ken Hobday	Yes	No	I believe the Core Strategy is not sound as it does not support sustainable development and contains policies that contradict protecting the environment					<a href="#">32</a>
Paragraph	1.1.4	167229	Ms Lucy Owen	Yes	No	<p>Para 1.1.4 states that the Core Strategy is the foundation DPD with which all other DPDs and SPDs must be in general conformity and, as such, it is the first DPD the Council has chosen to produce. This statement is inaccurate. The Council consulted on and adopted a number of SPD documents in 2012. Despite objections from the PLA and others relating to amongst other things the prematurity of these documents given the Council's progress with its Core Strategy. The Council is now relying on its adopted SPDs in relation to the approach set out in the Core Strategy.</p> <p>A copy of the PLA's representation on the SPDs is attached</p>	Update para 1.1.4 to reflect the adopted SPDs. It needs to be explained why the Council chose to depart from its previously stated approach (to adopt the Core Strategy first - the foundation DPD)				<a href="#">204</a>

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Paragraph	1.2.2	147468	Mr David Hammond	Yes	Yes	<p>Sustainability Appraisal – Non Technical Summary</p> <p>The key sustainability issues identified cover the areas and issues that Natural England would wish to seen considered in such a document.</p> <p>Seventeen Objectives have been identified which are broadly supported, especially objectives 14, 15 and 16. Similarly the approach and methodology used are in line with the advice that would be offered by Natural England.</p> <p>Habitats Regulation Assessment</p> <p>Greenwich’s approach and methodology to the habitats regulation Assessment is in line with advice that would be offered by Natural England and is therefore acceptable.</p> <p>The Conclusion reached in Chapter 8 that an Appropriate Assessment is not required can be agreed with by Natural England.</p>					<a href="#">118</a>
Paragraph	1.2.3	757304	Mr Ken Hobday	Yes	No	The 12 week Public Consultation was far too short and this Consultation Portal is far too difficult for many people to use and understand					<a href="#">33</a>
Vision	2.1	147465	Graham Saunders	Not specified	Not specified	<p>In general we welcome the vision for the Royal Borough and the reference to the Maritime Greenwich World Heritage Site (MGWHS). However, the Vision has not captured or articulated the opportunity and value of conservation-led regeneration. For example the Vision could set the scene where investment in a variety of heritage assets as found in all parts of the Royal Borough, such as Greenwich and Woolwich, could generate much needed growth. This approach is in line with the expectation of the NPPF (para 126) in providing sustainable development that delivers economic, social and environmental benefits for all.</p>					<a href="#">178</a>
Vision	2.1	148036	Ms Jenny	Not specified	Not specified	We object to the Vision and Strategic Objectives and Proposed Spatial Strategy which appear to miss out Air Pollution.					<a href="#">420</a>

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			Bates			<p>To be sound the Vision must include that EU legal limits on dangerous air pollutants are met, and meeting them is also reflected in the Strategic Objectives - the inclusion in L to reduce health inequalities is not sufficient. It must also be included in the Key Features of the Proposed Strategy.</p> <p>See below under section on air pollution for supporting reasoning.</p>					
Vision	2.1	167239		Not specified	Not specified	<p>The vision for the Borough states that by 2028, Greenwich will have successfully accommodated a high level of sustainable growth, which will have a positive and enhancing impact on the existing environment and community (paragraph 2.1.1). In addition, the Borough will have a prosperous and sustainable economy that will play a leading role in the economic regeneration of the Thames Gateway (paragraph 2.1.7).</p> <p>GH supports this vision for the future of the Borough.</p>		760672	Ed Britton	Deloitte Real Estate	<a href="#">385</a>
Paragraph	2.1.1	757304	Mr Ken Hobday	Yes	No	I do not believe the Vision within the Core Srtategy to be sound, as I feel many aspects of it will have a damaging and detrimental impact on the natural environment of the Borough.	To make the Vision Statement (2.1) sound I believe it should contain a statement proposing that Greenwich Council should seek to create a comprehensive Borough wide Green Infrastrucure right across the Borough by creating Green ecologically enhanced Green Open Spaces, which would be embedded in all the Core Strategy developments policies, so as to create a Green, Sustainable Borough that enhances and protects the Borough's natural environment and it's biodiversity and which makes Greenwich a truely Greener Borough.				<a href="#">42</a>
Paragraph	2.1.2	747890	Rev'd Malcolm Torry	Yes	No	I very much agree that the waterfront area should be a sustainable urban quarter. Sustainability requires such social infrastructure as children's playspace and such community infrastructure as community centres. These should be mentioned in the document at this or some other point.	After 'schools', add 'children's playspaces, community infrastructure such as community centres,'				<a href="#">5</a>
Paragraph	2.1.2	167229	Ms Lucy Owen	Yes	No	<p>There are numerous references throughout the document to the Council's vision/strategic objectives for the waterfront area. This is a rather blanket approach to the riverside that does not reflect the diverse river related activities that occur in the Borough, require a riverside location and should be protected.</p> <p>London Plan policy prioritises the use of the waterscape and land alongside it for water related purposes. It seeks to increase the use of the Blue Ribbon network for passenger and freight transport; protect existing facilities for</p>	The plan should be amended to include reference to the important protected river related infrastructure/uses along the waterfront and it should be made clear that development along the waterfront should not prejudice the river related infrastructure/uses				<a href="#">207</a>

Title	Number	Person ID	Full Name	Is the DPD legally compliant?	Is the DPD sound?	Reasons for legal compliance and soundness	Changes necessary for legal compliance and soundness	Agent ID	Full Name	Organisation Details	Comment ID
						waterborne freight handling use; and protects waterway support infrastructure such as boatyards, moorings, jetties and safety equipment  The Council's proposed approach for the riverside is not consistent with any of these London Plan policies					
Paragraph	2.1.5	741978	Mr Paul WEBBEWOOD	Yes	No	The DPD is unsound as it does not make clear that Eltham is a centre serving an area wider than merely the south of the Borough.	Third sentence of Para 2.1.4 should read "Eltham will have retained its role as the pre-eminent centre for the south of the Borough and surrounding areas"				<a href="#">3</a>
Paragraph	2.1.6	757304	Mr Ken Hobday	Yes	No	I do not believe policy statement 2.1.6 is sound as it does not adequately support sustainability, because it does not state protecting biodiversity by creating ecologically enhanced green open spaces.	I believe policy statement 2.1.6 should be made compliant and sound by including a statement such as : to support sustainability and to comply with the goal to make Greenwich a Greener Borough comprehensive Borough wide measures will be taken to ensure that ecologically enhanced green open space will be built into and incorporated into all new development, whether private, or public across the Borough.				<a href="#">45</a>
Paragraph	2.1.10	757514	RAGED Residents  RAGED  RAGED	Yes	No	The statements made here do not echo any commitment to protect, improve or add to the Open Spaces.	This statement should be improved to express the other Open Space inspirational statements in 4.5 and other parts of this DPD. The reason is that this statement does not echo any commitment to protect, improve or add to the Open Spaces.				<a href="#">29</a>
Themes	2.2	147465	Graham Saunders	Not specified	Not specified	We welcome the inclusion of a Strategic Objective related to the protection and  enhancement of Royal Greenwich’s rich built heritage (point G). However we would suggest  that parameters of the Objective should be broadened so that it identifies the expectation that  the Royal Borough’s heritage (in all of its form) will be sensitively used to inform positive  change. Essentially protecting and enhancing the historic environment should be seen as an  integral part of achieving sustainable development, as expressed in the NPPF (para 7 and  8). This includes delivering on growth across the whole Royal Borough through active  investment its heritage. In short investment in the historic					<a href="#">179</a>

Title	Number	Person ID	Full Name	Is the DPD legally compliant?	Is the DPD sound?	Reasons for legal compliance and soundness	Changes necessary for legal compliance and soundness	Agent ID	Full Name	Organisation Details	Comment ID
						environment can deliver on  Growing and Enhancing Royal Greenwich.					
Paragraph	2.2.1	757304	Mr Ken Hobday	Yes	No	Because the 'Theme' of Enhancing Royal Greenwich should state : protecting and enhancing the Borough's natural heritage and green spaces by building into and create a Borough wide Green Infrastructure.	Because the 'Theme' of Enhancing Royal Greenwich should state : protecting and enhancing the Borough's natural heritage and green spaces by building into and create a Borough wide Green Infrastructure.				<a href="#">46</a>
Strategic Objectives	2.3	148036	Ms Jenny Bates	Not specified	Not specified	We object to the Vision and Strategic Objectives and Proposed Spatial Strategy which appear to miss out Air Pollution.  To be sound the Vision must include that EU legal limits on dangerous air pollutants are met, and meeting them is also reflected in the Strategic Objectives - the inclusion in L to reduce health inequalities is not sufficient. It must also be included in the Key Features of the Proposed Strategy.  See below under section on air pollution for supporting reasoning.					<a href="#">421</a>
Strategic Objectives	2.3	167229	Ms Lucy Owen	Yes	No	There are numerous references throughout the document to the Council's vision/strategic objectives for the waterfront area. This is a rather blanket approach to the riverside that does not reflect the diverse river related activities that occur in the Borough, require a riverside location and should be protected.  London Plan policy prioritises the use of the waterscape and land alongside it for water related purposes. It seeks to increase the use of the Blue Ribbon network for passenger and freight transport; protect existing facilities for waterborne freight handling use; and protects waterway support infrastructure such as boatyards, moorings, jetties and safety equipment  The Council's proposed approach for the riverside is not consistent with any of these London Plan policies	The plan should be amended to include reference to the important protected river related infrastructure/uses along the waterfront and it should be made clear that development along the waterfront should not prejudice the river related infrastructure/uses				<a href="#">209</a>
Paragraph	2.3.1	741978	Mr Paul WEBBEWOOD	Yes	No	The purpose of the word word "diversity" in Paragraph 2.3.1.L is unclear. The word is sometimes (but not always) used in the context of an area's ethnic composition. This is not something relevant to planning policy.	To ensure clarity the words "To encourage diversity and" in 2.3.1.L should be deleted. The rest of the sentence can stand alone.				<a href="#">4</a>
Paragraph	2.3.1	757514	RAGED Residents RAGED	Yes	No	2.3 Strategic Objectives  Does not accurately reflect or properly state the Boroughs commitment to its Open Space.	The 2.3 Strategic Objectives  Should contain an Objective Statement which accurately reflect and properly state the Boroughs commitment to its Open Space.				<a href="#">24</a>

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			RAGED			Objective not reflected:-  4.5 Open Space  "The Borough’s open spaces ranging from Greenwich Park in the north west to Avery Hill Park in the south east and the South East London Green Chain will continue to make a significant contribution to biodiversity and the quality of life in Greenwich".  4.51 To provides wildlife habitats and enhances biodiversity and also offers opportunities for leisure and recreation activities and participation in sports and activities which can help to improve the health and well being of residents.  4.5.2 The Borough's green infrastructure is a major resource that needs to be protected, improved and made greater use of to ensure that its full potential is realised. Future development growth should result in new and enhanced provision of publicly accessible open space and recreation facilities. 'Greener Greenwich' is one of the themes of the Greenwich Strategy which aims to enhance our position as a green borough, ensuring that green spaces remain accessible and our natural biodiversity is conserved.  Not properly represented:-  Policy OS1 Open Space  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 such as Local Green Spaces.	Objective not reflected:-  4.5 Open Space  "The Borough’s open spaces ranging from Greenwich Park in the north west to Avery Hill Park in the south east and the South East London Green Chain will continue to make a significant contribution to biodiversity and the quality of life in Greenwich".  4.51 To provides wildlife habitats and enhances biodiversity and also offers opportunities for leisure and recreation activities and participation in sports and activities which can help to improve the health and well being of residents.  4.5.2 The Borough's green infrastructure is a major resource that needs to be protected, improved and made greater use of to ensure that its full potential is realised. Future development growth should result in new and enhanced provision of publicly accessible open space and recreation facilities. 'Greener Greenwich' is one of the themes of the Greenwich Strategy which aims to enhance our position as a green borough, ensuring that green spaces remain accessible and our natural biodiversity is conserved.  Not properly represented:-  Policy OS1 Open Space  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 such as Local Green Spaces.				
Paragraph	2.3.1	757514	RAGED Residents  RAGED  RAGED	Yes	No	The Objectives documented here do not echo any commitment to protect, improve or add to the Open Spaces as documented in 4.5 of the DPD and in the NPPF.	An Objective should be documented here to echo the commitment to protect, improve or add to the Open Spaces as documented in 4.5 of the DPD and in the NPPF.				<a href="#">30</a>
Paragraph	2.3.1	757304	Mr  Ken	Yes	No	I do not believe Strategic Objective 2.3.1 C) is sound, or sustainable, because it should specifiaclly state that any fixed link new river crossing of The Thames should be a public transport/pedestrian/cycle link ONLY, as I believe	I do not believe Strategic Objective 2.3.1 C) is sound, or sustainable, because it should specifiaclly state that any fixed link new river crossing of The Thames should be a public				<a href="#">47</a>

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			Hobday			any fixed road vehicle link would only increase the amount of road traffic into and throughout the Borough and this would be damaging to the environment; would create more traffic congestion throughout the Borough and would be damaging to the economic growth throughout the Borough. It would also be environmentally damaging by creating more atmospheric pollution and any such fixed road link crossing would therefore in my view not represent any form of sustainable development.	transport/pedestrian/cycle link ONLY, as I believe any fixed road vehicle link would only increase the amount of road traffic into and throughout the Borough and this would be damaging to the environment; would create more traffic congestion throughout the Borough and would be damaging to the economic growth throughout the Borough. It would also be environmentally damaging by creating more atmospheric pollution and any such fixed road link crossing would therefore in my view not represent any form of sustainable development.				
Paragraph	3.1.2	147468	Mr David Hammond	Yes	Yes	paragraph 3.1.2 refers to greenbelts but could also refer to biodiversity and ecology as per paragraph 109 of the NPPF					<a href="#">116</a>
Paragraph	3.1.2	167229	Ms Lucy Owen	Yes	No	<p>It is recognised that the lists in 3.1.2 are not exhaustive however, given the riparian nature of the Borough, it is considered that the following requirements within the NPPF should be included:</p> <ul style="list-style-type: none"> <li>- safeguard existing, planned and potential railheads, rail links to quarries, wharfage and associated storage handling and processing facilities, for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine dredged materials; and</li> <li>- safeguard existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products, and the handling, processing and distribution of substitute recycled and secondary aggregate materials</li> </ul> <p>In addition, the London Plan requirement to protect waterway support infrastructure such as boatyards, moorings, jetties and safety equipment etc should be included</p>	Update the text to include the references set out above				<a href="#">211</a>
Paragraph	3.1.4	147829	Ms Anna Townend	Not specified	No	<p>The Open Space Strategy is unpublished (p153/para 4.7.28). The high level of new homes proposed (29,078 minimum) are unsustainable as is the expected population increase (which exceeds the London and National average), (for) which the Housing is planned to accommodate. Greenwich's own natural increase needs are only a small part of this excessive target and London's growth (which is the given need) could reverse with government policy changes within the core strategy time-frame. This possibility, as a "sustainability alternative" should be identified as a green strategy policy in tandem ie. "limits to</p>	A large reduction in forecast housing growth generated by settlement from outside the borough.				<a href="#">355</a>

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						growth" options to each strategic policy should be given in the submission version of the core startegy and cover the Opportunity Areas of Greenwich Peninsula, Woolwich, Charlton Riverside, Deptford Creek/Greenwich Riverside.					
Proposed Spatial Strategy	3.2	147465	Graham Saunders	Not specified	Not specified	<p>It is noted with interest that the Royal Borough has been separated into definable places as</p> <p>illustrated in the diagram. It is not clear what evidence has been used to inform the different</p> <p>places shown. On considering the evidence base provided in Appendix 5, there appears to</p> <p>be no Borough-wide characterisation that could have been used to help define the different</p> <p>places identified and in turn inform the development of policy. We note that a Tall Buildings</p> <p>Assessment has been undertaken, which we commented upon in 2010 (when in draft).</p> <p>However unless the latest final version has been broadened in its consideration of all aspect</p> <p>of the Royal Borough’s character we would suggest that there is a gap in the evidence</p> <p>supporting this plan, contrary to the NPPF (para’s 58, 141,158, 169, 170).</p> <p>It should be noted that since our comments on the draft Assessment we have not seen the</p> <p>final version and we can not access a copy via the Council’s web pages.</p>				<a href="#">180</a>	
Proposed Spatial Strategy	3.2	148036	Ms Jenny Bates	Not specified	Not specified	<p>We object to the Vision and Strategic Objectives and Proposed Spatial Strategy which appear to miss out Air Pollution.</p> <p>To be sound the Vision must include that EU legal limits on dangerous air pollutants are met, and meeting them is also reflected in the Strategic Objectives - the inclusion in L to reduce health inequalities is not sufficient. It must also be included in the Key Features of the Proposed Strategy.</p> <p>See below under section on air pollution for supporting reasoning.</p>					<a href="#">423</a>
Proposed	3.2	745440	Ms	Not	No	The policy is unsound because: the growth suggested in this	This section needs to set out clearly how the new				<a href="#">320</a>

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ed Spatial Strategy			Sharon Hayward	specified		<p>section is not consistent with sustainable development.</p> <p>Of particular concern to tenant and other community groups we have worked with in Greenwich is that the proposed growth, through substantial release of under-used industrial land for mixed use developments, mostly in the opportunity areas situated along the riverside, will not result in the development of genuinely mixed and balanced communities, but rather in exclusive ones like those that have been created in other London riverside areas. London Tenants Federation has much evidence of this, which it can provide for the Examination in written or verbal evidence.</p> <p>Indeed the SE London 2009 SHMA makes it clear that the river is attractive to city workers. City workers are generally highly paid and it is likely that developers will argue that to make these riverside developments viable, it is essential to minimise on the inclusion of genuinely affordable homes.</p> <p>It is clear that existing and accessible employment (for existing and ordinary residents) may also be forced out.</p> <p>It is not clear that sufficient has been done to sustain and / or to enhance existing employment.</p>	homes and jobs planned within the opportunity areas will bring benefit to existing communities (particularly since this is an Olympic borough) especially to those on low incomes. It needs to specify how it will best preserve the homes and local employment that is already here, how existing low income residents will be assured of the homes and jobs they need within the growth areas and indeed how the polarisation, or exclusivity, of communities that exist within other London riverside developments will be avoided.				
Paragraph	3.2.1	147465	Graham Saunders	Not specified	Not specified	<p>In the context of delivering growth in the Royal Borough it is important to seek</p> <p>opportunities to enhance all heritage assets, not just conservation areas, as currently</p> <p>expressed.</p>					<a href="#">181</a>
Paragraph	3.2.2	147465	Graham Saunders	Not specified	Not specified	<p>It is important to recognise the need to positively utilise the historic environment</p> <p>as part of delivering economic growth, as well as protect and enhance the significance's of</p> <p>heritage assets.</p>					<a href="#">182</a>
Paragraph	3.2.3	757304	Mr Ken Hobday	Yes	No	<p>I believe one of the Key Features of the Proposed Spatial Strategy (3.2) should be to create a Borough wide Green Infrastructure that would seek to create ecologically enhanced Green Open Space throughout The London Borough of Greenwich. Such a Green Infrastrucure should have a presumption in favour of creating ecologically enhanced Green Spaces where ever it is suitable, possible and appropriate to do so and that there should be default postion adopted in favour of creating such ecologically enhanced Green Spaces, where ever such Green Spaces can be created.</p>	<p>I propose a Key Feature of The Spatial Strategy (3.2) should be to build into and right across and throughout the London Borough of Greenwich an ecologically enhanced Green Infrastructure by creating and linking together wherever it is possible to do so ecologically enhanced Green Spaces and wildlife habitat so as to provide a comprehensive Borough wide natural green environment linked together right across and throughout the Borough made up of a variety of habitats, which would help to protect our threatened and declining biodiveristy</p>				<a href="#">48</a>

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						<p>Such ecologically enhanced Green Spaces would enhance developments within the Borough by making them more attractive; help break up the continuity of built development; help bring people in touch with the natural environment by creating natural Green Spaces all around them and right across the Borough; enhance existing Green Spaces; would help create Green Corridors and would help protect and enhance our biodiveristy and truely help make Greenwich a Greener and more sustainable Borough.</p> <p>There should be a default consideration in favour of ecologically enhancing all Green Space where ever it is across the Borough, unless there is a very good reason reason otherwise for it not to be ecologically enhanced.</p> <p>This would help protect and enhance the natural environment of the Borough; create many more Green Spaces and truely make Greenwich a Greener and more sustainable Borough, which are two of the most important stated goals of Greenwich's Core Strategy.</p>	and which would help make Greenwich a truely Green and Sustainable Borough.				
Paragr aph	3.2.3	147465	Graham Saunders	Not specified	Not specified	<p>We welcome the reference to the protection and enhancement of the Royal Borough’s</p> <p>heritage assets. However we would suggest that this objective should be expanded to</p> <p>include reference to the value of investing in the Royal Borough’s historic environment as a</p> <p>key contributor to delivering economic, social and environmental benefits, of which together</p> <p>represent sustainable growth. For example the wording could be expressed as:</p> <p>Protection and enhancement of the Royal Borough’s open spaces and heritage assets and</p> <p>positive use of these assets as a catalyst for conservation-led regeneration. creation of new</p> <p>open spaces</p> <p>We would suggest that a separate objective is developed which focuses upon open spaces.</p>					<a href="#">183</a>
Paragr aph	3.2.3	166972	Cathedral Group	Yes	Yes	<p>Cathedral Group supports the principle of a high level of continuous growth proposed over the plan period. This will facilitate the delivery of the strategic objectives identified (on pages 12&amp;13).</p>		188810		Nathaniel Lichfield and Partners	<a href="#">500</a>

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Paragraph	3.2.5	167229	Ms Lucy Owen	Yes	No	<p>There are numerous references throughout the document to the Council's vision/strategic objectives for the waterfront area. This is a rather blanket approach to the riverside that does not reflect the diverse river related activities that occur in the Borough, require a riverside location and should be protected.</p> <p>London Plan policy prioritises the use of the waterscape and land alongside it for water related purposes. It seeks to increase the use of the Blue Ribbon network for passenger and freight transport; protect existing facilities for waterborne freight handling use; and protects waterway support infrastructure such as boatyards, moorings, jetties and safety equipment</p> <p>The Council's proposed approach for the riverside is not consistent with any of these London Plan policies</p>	The plan should be amended to include reference to the important protected river related infrastructure/uses along the waterfront and it should be made clear that development along the waterfront should not prejudice the river related infrastructure/uses				<a href="#">210</a>
Paragraph	3.2.6	635582	Ashleigh Marsh	Not specified	No	<p>3. Affordable Housing</p> <p>This relates largely to Woolwich, supporting paragraphs 3.3.2-4 in the 2013 Core Strategy, and is also relevant to the Peninsular and to Charlton Riverside, and to Policies H1 New Housing, H2 Housing Mix and H3 Affordable Housing,</p> <p>and to policy CH1 Cohesive Communities</p> <p>"There will be a mix of housing sizes and types developed in the Royal Borough, including family housing and apartments as well as a significant amount of affordable housing." (Core Strategy 2013 online 3.2.4)</p> <p>What is a significant amount? Allocations of affordable housing have not been consistent at 35% in the granting of recent planning applications. Affordable elements on the peninsular have recently been moved from the prime riverside sites to less marketable locations. This seems to be against the strategy to create mixed neighbourhoods, and is not justified by evidence. With the projected demolition of existing social housing where are the guarantees that local people will not be priced out of an area, resulting in a lack of social cohesion?</p> <p>The ambition of Greenwich Council to transform Woolwich with an injection of affluence is not balanced by an awareness that development hastened by financial incentives cannot be proved to be sustainable before it is attempted. Studies of the housing market notwithstanding, experience from residents of the new Woolwich Arsenal development and from nearby developments in</p>	Genuine flexibility and a commitment to keep enough industrial land in strategic locations for future economic contingencies would still enable the development of social and affordable housing on the less valuable sites which are vacant, such as the large Sainsbury's site, while keeping the industry nearby, consistent with national policy. There would then be more people able to work within walking distance of their homes. Is pressure from developers who want to maximise profits from sales currently preventing this kind of locally integrated sustainable community strategy?				<a href="#">284</a>

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						<p>Deptford show that local property prices have fallen after an initial boom, as the density of new development increases. This may result in more privately rented properties, as people are unable to sell them on, but they will still not be 'affordable' to most, and will result in more housing benefit payments going to private rather than social landlords, and so not being re-invested in communities.</p> <p>"The current state of the housing market has led to concerns that the industry will not be able to deliver this level of development." (Draft Core Strategy 2010 3.5.3)</p> <p>The Core Strategy depends on property prices remaining high, to sustain a re-shaping of the local retail economy. This depends on commuting and spending without local manufacturing. Recent global economic speculation involved a banking crisis framed around mortgage debts, and particularly brought into question the lack of safeguards surrounding financial industry. The banks' bail out intervention has restored property market confidence somewhat, but it is still a highly subsidised area of the economy, boosted with 'Help to Buy' and 'Funding for Lending' initiatives. Have Greenwich got an effective cast-iron guarantee that this level of subsidy will continue to sustain their plans over the next 15 years?</p>					
Paragraph	3.2.7	166972	Cathedral Group	Yes	No	<p>It is not sufficiently clear why the housing delivery has been front loaded to the period 2020/2021 and then drops by more than half of the yearly target in the following 7 years to 2027/2028 (Table 3.1). It is stated that the phasing reflects the findings of the 2009 London wide SHLAA but we do not consider that this is a robust rationale.</p> <p>Table 3.1 of the London Plan identifies a ten year target of 25,950 or 2595 per annum to 2021. Policy H1 of the RBG Core Strategy seeks the delivery of 25950 dwellings to 2021/22 (with a residual 20,760 to achieve from 2013/2014) but then seeks only 8,318 dwellings or 1,188 per year in the following period to 2027/28.</p> <p>Policy 3.3 of the London Plan states that Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1 and, if a target beyond 2021 is required, roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target. Whilst there is recognition in Policy H1 that the Borough’s housing target for the plan period 2021/2022-2027/2028 should be a minimum of 2595 dwellings a year rather than 1,188.</p> <p>There is no justification for a reduced figure (less than half)</p>	<p>The housing target should be amended so that the target for seven years from 2021/2022 to 2027/28 is 2595 net additional dwellings per year. The policy should also be amended to include reference to the Mayrps review of housing targets.</p> <p>Suggested wording:</p> <p>It is noted that the Mayor of London will undertake periodic reviews of housing targets set out in the London Plan. The Boroughs housing targets will be revised accordingly during this plan period if new London Plan housing targets are agreed.</p> <p>This representation is consistent with our representation on policy H1.</p>	188810		Nathaniel Lichfield and Partners	<a href="#">488</a>

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						<p>and as such the DPD is unsound on this matter.</p> <p>Further, the current wording of this policy is at odds with the preferred strategy to achieve high growth levels across the Borough.</p> <p>As a separate matter, there is no recognition in the policy that the Mayor will undertake a review of London wide targets in 2015/16. Paragraph 3.24 of the London Plan states:</p> <p>‘LDFs should roll forward the annual targets in Table 3.1 expressing the rolling target as an indicative figure to be checked and adjusted against any revised housing targets’</p> <p>Neither Policy H1 nor its supporting paragraphs make such an explicit reference. The DPD should include policies that are ‘effective’ i.e. that it should show a clear path for the delivery of the strategy and that the DPD is flexible, dealing with changing circumstances. The current wording does not provide sufficient robustness to recognise that the targets could change as early as a year after adoption of the DPD (depending on the Mayors review).</p>					
Paragraph	3.2.8	166972	Cathedral Group	Yes	Yes	Cathedral Group supports the growth of leisure, hospitality, tourism, digital and creative sectors across the borough. It also supports new job opportunities in low carbon sector, advanced manufacturing and life sciences.		188810		Nathaniel Lichfield and Partners	<a href="#">490</a>
Paragraph	3.2.10	166972	Cathedral Group	Yes	Yes	Cathedral Group supports the move away from low density industrial uses in the waterfront area. These typically do not represent the most effective use of land. A move to higher density uses is supported. This is consistent with London Plan Objective 5 which seeks the consumption of fewer resources and their more effective use.		188810		Nathaniel Lichfield and Partners	<a href="#">502</a>
Paragraph	3.2.14	147465	Graham Saunders	Not specified	Not specified	<p>It is important to protect and enhance the historic environment in its broadest sense, and to</p> <p>name all types of heritage assets, including conservation areas, listed buildings, registered</p> <p>historic parks and gardens, scheduled monuments and archaeology. It is also essential to</p> <p>ensure that the plan provides a positive strategy for the conservation and enjoyment of the</p> <p>historic environment in line with the NPPF. This is not currently recognised in the text of the</p> <p>plan.</p>					<a href="#">184</a>

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Paragraph	3.2.15	166972	Cathedral Group	Yes	Yes	<p>Cathedral Group supports the recognition that tall buildings may be supported in appropriate locations in the Borough and in particular, on the Peninsula. This will provide consistency with delivering higher density uses in waterfront locations that is being promoted elsewhere in this DPD.</p> <p>Cathedral Group would however suggest that the paragraph should be less ambiguous. It should read that tall buildings will be supported in appropriate locations. This would still allow for the rigorous testing at application stage that is no doubt envisaged by the DPD but would at the same time encourage proposals for tall buildings in order to meet the spatial objectives of the Plan.</p>		188810		Nathaniel Lichfield and Partners	<a href="#">501</a>
The Places of Greenwich/ Locations for Strategic Development	3.3	147465	Graham Saunders	Not specified	Not specified	<p>For ease of identifying and orientation where the places are in the Royal Borough, it would</p> <p>be useful to include within the document OS based maps. This could accompany the</p> <p>relevant text outline the extent of places being discussed. It is noted that some are in the</p> <p>Proposals Map Changes document, but their inclusion in the main body of the document</p> <p>would be more useful.</p> <p>The summary descriptions provided for each place is useful, but in some cases there is a</p> <p>lack of detail with regards to the heritage value found in each place and its contribution to its</p> <p>distinctiveness. This understanding should be developed from the evidence base, and then</p> <p>used to help provide a strategic framework for each place. It is not clear what evidence has</p> <p>been used for each place, and to what extent heritage matters have been identified and</p> <p>used. In some of the summaries there are some useful references, but again in others there</p> <p>is a lack of recognition of any heritage assets, their significance and contribution to the</p> <p>character and future management of places.</p>				<a href="#">185</a>	

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The Places of Greenwich/ Locations for Strategic Development	3.3	166965	Berkeley Homes	Not specified	Not specified	<p>Woolwich Town Centre Strategic Development Location (para 3.3.5 – 3.3.9)</p> <p>Annex 1 in the London Plan (July 2011) indicates that Woolwich should provide a minimum of 5,000 new homes. The Woolwich Town Centre Masterplan 2012 (Supplementary Planning Document) acknowledges the Policy Context however the Core Strategy does not currently recognise this. We would therefore like to see the strategic policy context recognised in paragraph 3.3.5 to 3.3.9.</p> <p>With regards to Table 3.2, 1,679 residential units have now been approved in detail at Royal Arsenal. The Construction of Phase 1 and 2 is complete and construction of the Crossrail Station and development above the Station has commenced. Redevelopment of the Royal Arsenal (Phase 1) commenced in 2006 and therefore we would recommend that the expected build out phasing is amended to say that completion is expected by 2024.</p> <p>Kidbrooke Strategic Development Location (para 3.3.39 – 3.3.41)</p> <p>In principle we support the Kidbrooke Strategic Development Location and the objectives set out in paragraph 3.3.39.</p> <p>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.</p> <p>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 secured detailed approval for 2,519 residential units.</p> <p>Whilst we appreciate the Planning Status will evolve, we do think that the situation stated should be as up to date as possible.</p> <p>However, as set out in our earlier representations in January 2011, we note that the Council’s intention is to delete the Kidbrooke Development Area (KDA) from the Proposals Map. We object to this for the following reasons:</p> <p>1. Firstly, we are very concerned that the proposed deletion has been suggested without any form of justification being provided;</p>		188419	Mr Bob McCurry	Senior Planner Barton Willmore	<a href="#">399</a>

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						<p>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;</p> <p>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.</p>					
The Places of Greenwich/ Locations for Strategic Development	3.3	759983	Ms Rinaani Musutua	Not specified	Not specified	<p>The places of Greenwich/locations for spatial strategic developments Thamesmead (page 33 - 34) would benefit by including detail on the specific services and facilities which will be improved in the area. The local community still needs to be consulted to find out on what they need most. More information is needed on affordable social rented accommodation which is needed by the local community. The local authority believes that the delivery of affordable housing is a key component of housing delivery and yet is not clear on how the unmet need for affordable homes will be addressed/delivered.</p> <p>Neither is there a strong evidence base that the remodelling of Thamesmead Town Centre will provide more of in order to meet all of Thamesmead’s retail and services needs. There is an over emphasis on retail .It would therefore be helpful to have more details on services such GPs, schools ect.</p> <p>There is no policy such as, EA4, which provides specific policy details on non industrial developments in Thamesmead. It does not make specific reference if the 2,000 residential units to be developed at Tamesis Point will meet the needs of large family-sized homes and how much will be social rented housing.</p>	To give a understanding to local residents, the strategic developments in Thamesmead need a clear reference to what additional retail and services the local community will benefit from and how a net increase in jobs will be achieved, and also what type of housing will be provided. As Thamesmead is a major strategic development location, a specific policy supporting the sustainability and enhancement of the location is needed.				<a href="#">278</a>
The Places of Greenwich/ Locations for Strategic	3.3	760660	Sally Miles	Not specified	Not specified	<p>CgMs welcomes the active approach taken to promoting substantial redevelopment throughout the Borough and agree that there are significant opportunities for further residential and commercial development including traditional employment, retail and leisure provision. Indeed, the strategy recognises the significant role leisure and retail facilities play within the Greenwich area.</p> <p>It is acknowledged that the authority should seek to support</p>					<a href="#">375</a>

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Development						<p>town centres and to promote new district centres to provide facilities for local residents.</p> <p>However, the policy framework should also enable individual proposals that may come forward during the lifetime of the Core Strategy to be determined on their own merits. It is not possible to envisage all potential retail and commercial opportunities that may come forward during the plan period. Some specific retail operators may identify specific requirements for the area which can provide valuable services to residents and can also provide significant employment opportunities more than comparable to traditional employment uses. The Plan should incorporate a criteria based policy reflecting the standard criteria contained within the NPPF to enable proposals to be considered on their own merits.</p> <p>In addition, there are a number of existing retail parks which serve the needs of the area. Existing retail parks should be identified and allocated and policy should support proposals to redevelop or enhance the facilities provided within these established retail locations.</p>					
The Places of Greenwich/ Locations for Strategic Development	3.3	761290	V I P Trading Estate	Not specified	Not specified	We note that in the draft document a new distributor road is indicated to run across or through my client's land. Whilst we do of course understand that the Council will need to go through the normal CPO procedures in respect of acquisition, we would wish to place on record at this stage that we would expect that as far as possible any road would be on or very close to the boundary so that it did not sterilise other areas of my client's ownership. In addition, we would ask that frontage development includes retail and or leisure uses.		496804	Mr John Collins	DHA Planning	<a href="#">409</a>
Paragraph	3.3.5	634722	Crossrail	Not specified	Not specified	<p>The Woolwich Town Centre Masterplan Supplementary Planning Document, which was</p> <p>adopted in April 2012, provides considerable detail on the growth of Woolwich and outlines the</p> <p>desired approach to a number of sites. However, the current drafting of the Core Strategy with</p> <p>Development Management Policies document does not give sufficient reference to this SPD</p> <p>and outlines only two of the sites that are being promoted for development. Greater</p> <p>recognition should be given to the SPD as it has undergone statutory consultation and been</p>		634723	Stephen Harrington	GVA Grimley	<a href="#">87</a>

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						fully adopted.					
Paragr aph	3.3.7	635582	Ashleigh  Marsh	No	No	<p>I object to 3 aspects of the Core Strategy and believe that they show that areas of the overall strategy at present are not sound, not being justified, positively prepared or effective.</p> <p>I would like to take part in the examination of the plans to provide and discover background information.</p> <p>I will try to post this on the consultation portal site, but find the separation of comments required impractical and not helpful in setting out wider relevant information.</p> <p>I have referred to a previous draft of the Core Strategy in 2010/11where appropriate to flag up where identified issues for concern have not since been fully addressed. I also refer to the Unitary Development Plan, the previous planning framework which contains valuable safeguards for recreation space, which need to be maintained, and to the 2012 Supplementary Planning Documents for Woolwich and Charlton which were adopted before this Core Strategy consultation.</p> <p>1. Woolwich Riverside - Open Space loss</p> <p>This relates mainly to Woolwich Town Centre Strategic Development Location, supporting paragraphs 3.3.5-9 and Table 3.2 in the 2013 Core Strategy, and to Policy OS1 Open Space, which is currently being prepared - 4.5.4 2013 Draft Core Strategy</p> <p>and to Policy OS (d)</p> <p>My first objection is to the loss of public play space on Woolwich riverside, which should be replaced with an equivalent area and facilities for recreation. The London Plan does not support the removal of playing fields and other sports provision without replacement sites being secured. This should be assured before planning permission is granted. However Greenwich have permitted high-rise high density development on the Warren Lane site, which is a much needed public park in an area of open space deprivation, yet have not sought to provide a suitable local replacement while preparing the Core Strategy.</p> <p>From Greenwich Unitary Development Plan (01 Protecting Open Space)</p> <p>Map 5 on page 78 shows the Public Open Space Deficiency</p>	The Core Strategy should include a meaningful commitment to replace this recreation space, not with paved landscaped areas but with open playing fields and a free wheeled sports facility, as at present.			<a href="#">55</a>	

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						<p>Area in Woolwich.</p> <p>"d. The proposal must not result in the enlargement or creation of an area of public open space deficiency (see Policy O9).</p> <p>Map 5 on page 78 of the UDP shows the Public Open Space Deficiency Area in Woolwich. It is similar to Map 4.5.28 in the 2013 Core Strategy.</p> <p>In the 2013 Core Strategy Policy OSd the conditions have been changed to an and/or format, which does not guarantee replacement. It is not proper positive preparation that this policy should be changed to have retro-active effect on a planning application.Such a change has implications for the reliability of monitoring and effective implementation of any plans.</p> <p>The Warren Lane site was particularly excluded from the Woolwich Riverside Supplementary Planning Document consultation in 2012, while the Core Strategy was being prepared, on the grounds that planning permission had already been granted. This is not positive preparation, which should take into account such circumstances and seek to address their consequences pro-actively. The desire to secure a Crossrail Station for Woolwich has led to a conflict of interest, with increasing pressure from the developers Berkeley Homes to increase the density of development, against local feeling, while still making no clear commitment to build the station. This brings into question the effectiveness of Greenwich's planning priorities and implementation, as the council have agreed to the developer's modifications without obtaining the promised planning gain in compensation, or providing for the loss of community facilities entailed.</p> <p>The Core Strategy should include a meaningful commitment to replace this recreation space, not with paved landscaped areas but with open playing fields and a free wheeled sports facility, as at present.</p> <p>The local well-used leisure centre in a prime riverside location is also planned to be relocated to a site yet to be agreed. The justification for this is questionable - Allies and Morrison, consultants for the Supplementary Planning Document, claimed that it would 'open up the view to the river'. There is no suitable alternative site of a comparable size in the area, and with the population set to increase such fitness facilities will be vital to community health.</p>					

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						Community facilities by the river in Woolwich are under pressure where they are because of potential profits from development. Lack of community play space within high-density residential development has proved to be a bad equation, contributing to social tension rather than to sustainable communities. The fact that these developments will be mostly 'high value' rather than social housing has not been shown to make a positive difference against such environmental factors. We are at the stage of a social experiment here. Greenwich risks repeating the recognised planning errors that high density residential development has involved.					
Paragraph	3.3.11	167229	Ms Lucy Owen	Yes	No	<p>It is acknowledged that Charlton Riverside SDL is in an Opportunity Area in the London Plan and therefore significant development will be taking place in the area over the plan period. However, it needs to be made clear that this is not at the expense of the safeguarded wharves that are located in the SDL.</p> <p>The PLA objected to the Charlton Riverside which was published in April 2012. At that time the PLA explained how the SPD was contrary to policy and that there were timing issues ie. the Core Strategy was not yet adopted. Despite this, the Council adopted the SPD and they are now relying on it in the promotion of the approach they are taking to the Core Strategy. Neither the SPD nor the Core Strategy adequately addresses the issues relating to the safeguarding of wharves and they both promote an approach that is contrary to national and London plan policy</p>	Update the text to make it clear that the safeguarded wharves are protected for river based cargo handling				<a href="#">212</a>
Paragraph	3.3.11	167239		Not specified	Not specified	GH supports the growth and development of designated town centres to provide a range of housing, facilities and services that will meet the needs of communities they serve. This is very relevant to Greenwich town centre. While the town centre serves as a unique historic tourist attraction, it also has a diverse and growing community whose needs must be met to ensure the vitality of the town centre and the local economy.		760672	Ed Britton	Deloitte Real Estate	<a href="#">386</a>
Paragraph	3.3.19	747890	Rev'd Malcolm Torry	Yes	No	Please see my comment on Greenwich 2028, paragraph 2.1.2. I agree that the new homes and residents need to be supported by a new District Centre providing for shopping needs, but the homes and residents also need to be supported by additional infrastructure, and particularly children's playspaces (which get a mention in the Charlton Riverside section above, but not here). Because the Greenwich Peninsula is somewhat isolated from other communities, provision should also be made in the document for such facilities as community centres, a leisure centre, and places for cultural and religious activity.	After 'shopping needs of local residents' add 'and will also feature children's playspaces and such social infrastructure as community centres and facilities for leisure, cultural and religious activities.'				<a href="#">6</a>

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Paragraph	3.3.23	167229	Ms Lucy Owen	Yes	No	<p>Greenwich Peninsula Strategic Development Location. Reference is made to the area containing the safeguarded Tunnel Glucose wharf (now known as Tunnel Wharf) but no reference is made to the safeguarded Victoria Deep Water terminal. It needs to be made clear that any development in the area must not be at the expense of the safeguarded wharves.</p> <p>There is no reference to the boatyard facility at Bay Wharf</p> <p>Reference is made to Lovells, Granite, Badcocks and Pipers and the provision of a rowing club. However, an application has recently been submitted to the Council to amend the permitted development and to remove the provision of the rowing club.</p> <p>Reference is also made to Enderby wharf and an update on the timings should be provided.</p> <p>The PLA objected to the Greenwich Peninsula West SPD which was published in April 2012. At that time, the PLA explained how the SPD was contrary to policy and that there were timing issues ie. the Core Strategy was not yet adopted. Despite this, the Council adopted the SPD and they are now relying on it in the promotion of the approach they are taking in the Core Strategy. Neither the SPD or the Core Strategy adequately address issues relating to the safeguarding of the wharves and they both promote an approach that is contrary to national and London Plan policy.</p>	Update the text to make it clear that the safeguarded wharves are protected for river based cargo handling, to protect waterway support infrastructure and to reflect the latest positions concerning Lovells, Granite, Badcock and Pipers wharves and Enderby wharf				<a href="#">229</a>
Paragraph	3.3.23	166972	Cathedral Group	Yes	Yes	Cathedral Group fully supports the strategy for a new high quality urban quarter at Greenwich Peninsula West. The proposed uses of leisure, enterprise space and new housing to complement the current leisure uses on the Peninsula are also fully supported.		188810		Nathaniel Lichfield and Partners	<a href="#">510</a>
Paragraph	3.3.23	501281		Yes	No	<p>Paragraph 3.3.23 provides guidance for how the Greenwich Peninsula West Strategic Development Location is intended to come forward as a new urban quarter. We welcome the Council's ambitions for a mixed use approach to this area but, as currently worded, the range of uses identified is limited to cruise liner terminal, and associated leisure, hotel and enterprise space in addition to new housing.</p> <p>However, 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 paragraph lacks the necessary flexibility to respond to requirements and changes in the market in this regard.</p>	<p>As set out in sections 5 and 6, the Core Strategy lacks flexibility with regard to paragraph 3.3.23 and is therefore not "effective". To enable the Core Strategy to pass the NPPF test of "soundness", in terms of being "effective", it is necessary to amend paragraph 3.3.23 to increase the flexibility with regard to the range of uses identified. Our suggested amendment to the first sentence of this paragraph is as follows:</p> <p>"This 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."</p>	501275	Mr Andrew Sack	Associate Gerald Eve on behalf of Morden College Trust	<a href="#">416</a>

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						<p>The issues outlined above result in the Core Strategy failing to pass the test of soundness set out in the NPPF in relation to the specific requirement for the Core Strategy to be 'effective.' This is due to the following:</p> <p>- to be effective, the NPPF states that 'the plan should be deliverable over its period.' To be deliverable, flexibility is required. This is outlined in para 21 of the NPPF where it states that 'In drawing up Local Plans, local planning authorities should: support existing business sectors, taking account of whether they are expecting or contracting and, where possible, identify and plan for new and emerging sectors likely to located in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.'</p> <p>- furthermore, Royal Greenwich acknowledges in the Guidance notes for Making Representations on Development Plan documents, that the plan should be "flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals".</p> <p>- with reference to these points, the Core Strategy does not have the flexibility to respond to changes in the market that may result in the need for retail, employment and other supporting service uses within the Greenwich Peninsula West Strategic Development Location.</p> <p>For these reasons the Core Strategy fails to pass the test of soundness with regard to being "effective".</p>					
Paragr aph	3.3.24	166972	Cathedral Group	Yes	Yes	Cathedral Groups supports the release of some existing industiral land in order to enable a more effective use of the Greenwich Peninsula West Strategic Development Location. However, we refer you to our objections on the defiend SIL boundaries on proposals Map 8.		18881 0		Nathaniel Lichfield and Partners	<a href="#">511</a>
Paragr aph	3.3.25	634115	Mr  James  Blakey	Yes	No	The wording of paragraph is misleading	Replace the second sentence of paragraph 3.3.25 with 'The cruise terminal at Enderby Wharf has been approved as part of a mixed use regeneration scheme and will be delivered over the next few years as part of an emerging tourism strategy'				<a href="#">265</a>
Paragr aph	3.3.25	166972	Cathedral Group	Yes	No	Recognition should be given in the paragraph that the defined boundary of the existing safeguarded Tunnel Glucose Wharf is due to be withdrawn so that it will be to the immediate north of the current designation. This change forms part of the GLA's sSafeguarded Wharved Review that	Rather than referring to the safeguarded Tunnel Glucose Wharf..., the paragraph should be amended to read "a safeguarded Tunnel Glucose Wharf (subject to current GLA review). This recognition should be given so that the revised	18881 0		Nathaniel Lichfield and Partners	<a href="#">491</a>

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						<p>is currently underway.</p> <p>The document submitted to CLG (March 2013) shows that Tunnel Glucose Wharf will be "flipped" from a "southern" position to a "northern" position under a revised Directive from the Secretary of State. In addition we consider that the boundary shown through the southern warehouse should be amended. There is no logical reason for the boundary to split the southern warehouse in the way that it does on the safeguarded review report.</p> <p>We have petitioned both the CLG and the GLA in this regard.</p>	Directive will provide consistency with the defined Strategic Industrial Location (Policy EA4)				
Paragraph	3.3.25	501281		Yes	No	<p>Paragraph 3.3.25 indicates that the Greenwich Peninsula West Strategic Development Location "contains the safeguarded Tunnel Glucose Wharf". This does not take into account the Greater London Assembly Safeguarded Wharves Review Final Recommendation 2013 document which indicates that the extent of Tunnel Glucose Wharf is likely to be reduced in size and moved northward to become "Tunnel Wharf". This document has now been submitted to the Secretary of State for approval prior to issuing of required new/revised Safeguarding Directions.</p> <p>As a result, the Core Strategy fails to pass the test of soundness set out in the National Planning Policy Framework (NPPF) in relation to the specific requirement for the Core Strategy to be "effective". This is due to the following:</p> <ul style="list-style-type: none"> <li>• To be effective, the NPPF states that "the plan should be deliverable over its period". To be deliverable, flexibility is required. This is set out in paragraph 21 of the NPPF where it states that,</li> </ul> <p>'in drawing up Local Plans, local planning authorities should: support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.'</p> <ul style="list-style-type: none"> <li>• Given that the GLA safeguarded wharves review is based on a review of changing demand for water based freight transport created by business, the lack of recognition of this work in paragraph 3.2.25 fails to accommodate the flexibility required to respond to the revised safeguarding directions flowing from the review. As a result, paragraph</li> </ul>	<p>As set out in sections 5 and 6, the Core Strategy lacks flexibility with regard to paragraph 3.3.25 and is therefore not "effective". To enable the Core Strategy to pass the NPPF test of "soundness", in terms of being "effective", it is necessary to amend paragraph 3.3.25 to take account of the on-going GLA safeguarded wharf review in relation to Tunnel Glucose Wharf. Our suggested amendment to the first sentence of this paragraph is as follows:</p> <p>"This area contains a safeguarded wharf known as Tunnel Glucose Wharf, which is currently under GLA review."</p> <p>Through this change, consistency will also be provided between the revised safeguarding directive that will be issued by the Secretary of State.</p>	501275	Mr Andrew Sack	Associate Gerald Eve on behalf of Morden College Trust	<a href="#">417</a>

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						wording as it stands is not "effective"					
Paragraph	3.3.29	167239		Not specified	Not specified	GH supports the provisions of this policy as it is allied with the strategic objectives of the 'Enhance and Improve' investment programme.		760672	Ed Britton	Deloitte Real Estate	<a href="#">387</a>
Paragraph	3.3.37	147698	Laurie Baker	Not specified	Not specified	The Society supports the general statement about the planning policy for Eltham stated in paragraph 3.3.37.					<a href="#">151</a>
Paragraph	3.3.43	630863	Transport for London	Not specified	Not specified	<p>TfL notes reference to the White Hart Triangle site, and encourages RB</p> <p>Greenwich to set out existing proposals to facilitate the creation of temporary</p> <p>infrastructure associated with the development of Crossrail.</p>					<a href="#">65</a>
Paragraph	3.3.44	760702	Royal Mail	No	No	<p>We note that the draft documents identify Greenwich &amp; Charlton Delivery Office as forming part of the draft Charlton Riverside Strategic Development Location (Map 2). Draft Core Strategy Policy EA2 states that "the area will include a new mixed use urban quarter" and the development of 3,000 - 5,000 new homes is sought.</p> <p>We also note that Woolwich DO falls within the boundary of draft Thamesmead Strategic Development Location (Map 4). The draft Core Strategy promotes mixed use development across this area.</p> <p>Royal Mail object to these allocations unless Royal Mail's existing operations on these sites are relocated/re-provided at suitable alternative sites or retained as part of the proposed schemes.</p>	<p>In terms of the former, it would be essential that any new facilities are provided prior to the demolition of those existing, to ensure Royal Mail's continuity of service. This will ensure that Royal Mail's operations will not be prejudiced and that they can continue to comply with their statutory duty to maintain a 'universal service' for the UK pursuant to the Postal Services Act 2000.</p> <p>In order for the sites to be brought forward for redevelopment, relocation will need to be viable for Royal Mail. There will need to be a commercial attractiveness that would incentivise the business to relocate the operations.</p> <p>Should Greenwich &amp; Charlton Delivery Office and Woolwich Delivery Office be retained as part of the proposed schemes, it would be essential that any new development adjacent to these sites is compatible with Royal Mail's existing operations. This is necessary to ensure Royal Mail's continuity of service and to preserve the amenity of those occupying any neighbouring new development.</p> <p>Royal Mail will not accept responsibility for remedying any noise, transport and/or amenity complaints from those occupying any new neighbouring development which may arise as a result of activity within Greenwich &amp; Charlton Delivery Office and Woolwich Delivery Office. In the event of any such future complaints, any retrospective mitigation measures will need to be delivered within the neighbouring development site(s) and at the expenses of the developers (or future landowners).</p>	760699	Claire Davies	DTZ	<a href="#">396</a>

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Paragraph	3.3.50	630863	Transport for London	Not specified	Not specified	In response to planned growth in Thamesmead, TfL requests clarification of  whether any additional transport infrastructure is required to accommodate this  growth, particularly in the instance of the Tamesis Point area.					<a href="#">62</a>
Paragraph	3.4.3	147698	Laurie Baker	Not specified	Not specified	The Spatial portrait gives a rather one-sided view of Eltham.	Paragraph 3.43 should give a fuller description of the housing mix, with “detached, semi-detached and terraced houses together with a number of high rise blocks of flats”. During the 20th Century, the largely rural area gave way to major developments of public housing, which are now well-established residential areas.				<a href="#">161</a>
Paragraph	3.5.2	634115	Mr James Blakey	Yes	No	The document should reference the Royal Greenwich destination management organisation	The document should reference the Royal Greenwich destination management organisation				<a href="#">266</a>
Paragraph	3.5.12	634722	Crossrail	Not specified	Not specified	Further to the above comment, greater reference to Woolwich is required in the Housing  Delivery section to promote Woolwich as a location for growth alongside those already  identified. Whilst Strategic Development Locations are described as important locations for  housing delivery, within which Woolwich is included, there is no further reference made to  Woolwich. Woolwich is a one of a number of key locations for housing provision and this should be recognised at this point in the document.		634723	Stephen Harrington	GVA Grimley	<a href="#">88</a>
Housing	4.1	537756	Mr Richard Lee	Not specified	No	The policies are unsound  • in their failure to protect existing homes and the loss of social rented homes  • new build not meeting objective needs of the local community  • poor consultation prior to demolition  • the adverse equalities impact on women, disabled and older communities  We support the detailed evidence of London Tenants					<a href="#">253</a>

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						Federation.					
Paragraph	4.1.1	148464	Mr Lawrence Smith	Yes	No	We support the need for appropriate infrastructure to support housing development, but it is not fully effective because it makes no reference to RBG's Infrastructure Delivery Plan.	At the end of the sentence " In delivering housing for Greenwich 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." add "as set out in the Infratructure Delivery Plan".				<a href="#">34</a>
Paragraph	4.1.6	148464	Mr Lawrence Smith	Yes	No	The proposals are ineffective in that they do not fully protect Metropolitan Open Space.	Add a second sentence "There will be complete protection for Metropolitan Open Space."				<a href="#">35</a>
Paragraph	4.1.8	501408	Mr John Franklin	Not specified	No	:The Greenwich Society supports the provisions of this paragraph, and the provisions of preceding paragraph, 4.17 – but, noting the reference to “older people who have specific housing needs”, we consider that this needs to be developed further to define the ‘specific housing needs’ of the elderly. For example, we consider that reference should be made to semi-sheltered housing for the elderly, ie residential units intended for independent living but specially designed and having some form of warden oversight. As far as we can recall, none of the major development schemes within our area have ever made such provision, whether for owner-occupation or within the affordable housing quota.	Include reference to sheltered and semi-sheltered housing for the elderly, and to say what steps the Council will take to meet this need.				<a href="#">134</a>
Paragraph	4.1.12	634115	Mr James Blakey	Yes	No	Contrary to the London Plan - adopted 2011	Para 4.1.12 should be reworded to reflect adopted policy in the London Plan				<a href="#">267</a>
Paragraph	4.1.12	166972	Cathedral Group	Yes	No	Paragraph 4.1.12 identifies that:  The affordable housing that is provided should be provided as 70% social/affordable rented and 30% intermediate housing. The mix of social rented and intermediate housing is more suited to the borough than the 60/40 split proposed in the London Plan as it better represents the high demand for social rented housing in Greenwich and the relatively limited take up of intermediate housing".  We consider that in some parts of the borough the mix would be more appropriately aligned with the London Plan at a 60/40 split.	We suggest the amended wording of Paragraph 4.1.12 should be as follows:  "The affordable housing that is provided should be consistent with the London Plan general target of a 60% social/affordable and a 40% intermediate housing split. However in some parts of the borough an adjusted proportion of 70% social/affordable rented and 30% intermediate housing is more appropriate. Affordable Rent housing is included..."	188810		Nathaniel Lichfield and Partners	<a href="#">489</a>
Paragraph	4.1.14	634115	Mr	Yes	No	Contrary to the London Plan - adopted 2011	Policy 4.1.14 should accurately reflect adopted				<a href="#">268</a>

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aph			James Blakey				policy in the London Plan				
Paragr aph	4.1.29	166972	Cathedral Group	Yes	No	<p>The Core Strategy proposes a minimum garden area of 50sqm for all houses with up to 3 bedrooms with an additional 15sqm for each additional bedroom (excluding front gardens and access paths). This level exceeds the standards set out in GLA's adopted Housing SPG (November 2011) and does not appear to have been justified through the evidence base.</p> <p>THE SPG states at paragraph 4.10.1 that a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. There is no specification that this should be in the form of a private garden. RBG's requirement significantly exceeds the Housing SPG requirement and does so without full justification.</p>	RBG should reviewthe minimum garden area requirements for houses and where it is more onerous than the Housing SPG, be clear in its evidence base for doing so - including the consideration of viability and the delivery of wider planning benefits.	188810		Nathaniel Lichfield and Partners	<a href="#">512</a>
Paragr aph	4.1.29	756674		Yes	No	<p>THE CORE STRATEGY (PARA 4.1.29) PROPOSES, AS A GUIDE, A MINIMUM GARDEN AREA OF 50 SQ M FOR ALL HOUSES WITH UP TO THREE BEDROOMS WITH AN ADDITIONAL 15 SQ M FOR EACH ADDITIONAL BEDROOM. THIS IS IN ADDITION TO ANY SPACE OCCUPIED BY FRONT GARDENS AND ACCESS PATHS.</p> <p>THE GLA'S ADOPTED HOUSING SPG (NOVEMBER 2011) STATES (PARA. 4.10.1) THAT A MINIMUM OF 5 SQ M OF PRIVATE OUTDOOR SPACE SHOULD BE PROVIDED FOR 1-2 PERON DWELLINGS AND AN EXTRA 1 SQ M FOR EACH ADDITIONAL OCCUPANT. THE LEVEL PROPOSED BY RBG EXCEEDS THESE STANDARDS AND DO NOT APPEAR TO HAVE BEEN JUSTIFIED THROUGH THE EVIDENCE BASE.</p>	THE TEXT SHOULD BE REVIEWED SO THAT IT IS IN LINE WITH THE GLA HOUSING SPG OR A CLEAR EVIDENCE BASE SHOULD BE PROVIDED TO DEMONSTRATE WHY THE GUIDANCE IS JUSTIFIED.	756671	Mrs Sarah Moorhouse	Associate Director  Nathaniel Lichfield & Partners	<a href="#">449</a>
Paragr aph	4.1.30	166972	Cathedral Group	Yes	Yes	Cathedral Group supports the recognition that there is scope of lower level of private amenity in some locations, for example, in developments adjacent to public open space. This is consistent with the strategy to deliver a large number of dwellings along the waterfront where there will be a natural open space provision and public amenity space provided.		188810		Nathaniel Lichfield and Partners	<a href="#">509</a>
Paragr aph	4.1.37	629637	Dr Leslie Clark	Yes	No	The DPD differs from its predecessor, the Unitary Development Plan, in that it doesn't have a policy on density (policy H9 in the UDP) and doesn't justify the omission. The DPD does have some guidance on density, but refers out to the London Plan, which uses a model based on Public Transport Accessibility Levels (PTALs).	Either the DPD should reinstate the table from the UDP (policy H9) or preferably include a new policy on density that fleshes out and explains table 3.2 of the London Plan. A map showing PTAL contours or levels across the borough would be useful, or at very least a definitive statement on				<a href="#">17</a>

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						<p>The calculation of PTALs is quite obscure, and seems to rely on going to a web site such as the TfL Planning Information Database <a href="http://www.webptals.org.uk/">http://www.webptals.org.uk/</a>. However neither the DPD nor the London Plan specify a web site or other source of PTAL data, and it is difficult for a member of the public who is using the DPD to visualise what the data might be or how to use it in practice. The abbreviations and acronyms used in table 3.2 of the London Plan aren't defined and explained.</p> <p>This makes the DPD unusable in practice.</p>	how PTALs are to be calculated, Any abbreviations and acronyms used should be defined and explained.				
Paragraph	4.1.38	501408	Mr John Franklin	Not specified	No	<p>Housing density has a major effect of the well-being of residents and communities as a whole. So it is regrettable that the policy on new housing density is unclear. It is stated that the London Plan guide rates for densities will be used as guidelines, but will be applied flexibly. The examples given suggest that this will usually mean leaning towards lower densities; for example the “central” category, where the highest densities are permitted, will only be applied to Woolwich town centre and not to other centres in RBG and some areas within 800 metres of “urban” centres” will be treated as “suburban” to preserve their character. However, recent experience in West Greenwich and the Peninsula is that higher densities are being allowed than are recommended in the London Plan. The cumulative adverse impact on quality of life will be considerable, not least because of the pressure on all forms of infrastructure and social facilities.</p>	There should be a clear commitment to the London Plan standards, which should be included as a table in the Core Strategy, and intended exceptions should be set out clearly in the document.				<a href="#">591</a>
Paragraph	4.1.43	502194	Waite	Yes	No	<p>Certain definitions are unclear and may mean the opposite of what the reader believes.</p> <p>Policy H (c): 'backland' appears to exclude plots with street frontage (glossary p234) so these may be deemed suitable for development, however they do not exist in isolation and developing them would ruin the whole of a backland eco-system.</p> <p>Para 4.1.43: 99% of development is supposed to be on brownfield but this still may see development on other sites, back gardens are not classified as brownfield but equally they are not described as greenfield and there is no mention of sites which were rear gardens but have been sold off and never developed.</p>	Definitions need providing to ensure clarity and soundness. All backland should be protected from development land that was or formed part of a garden should not be developed.				<a href="#">436</a>
Paragraph	4.2.5	166972	Cathedral Group	Yes	No	<p>Whilst Cathedral Group gives overwhelming support for the redevelopment of Greenwich Peninsula West and the release of industrial land, caution is given to the assertion that the retained employment land will be intensified so that there will be no net loss of employment across the</p>	The paragraph should be amended to read that RBG fully supports the intensification of retained employment land. This is necessary as without it there is no delivery mechanism to realise the aspiration otherwise.	188810		Nathaniel Lichfield and Partners	<a href="#">514</a>

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						<p>waterfront area.</p> <p>Where employment areas are retained and included as part of the redevelopment proposals, encouragement should be given to intensify the land use to maximise the efficient use of this resource. However, there is no clear mechanism within the DPD to intensify retained employment areas outside of the control of those with interest in redevelopment sites.</p>					
Paragraph	4.2.8	635582	Ashleigh Marsh	No	No	<p>I object to 3 aspects of the Core Strategy and believe that they show that areas of the overall strategy at present are not sound, not being justified, positively prepared or effective.</p> <p>I would like to take part in the examination of the plans to provide and discover background information.</p> <p>I will try to post this on the consultation portal site, but find the separation of comments required impractical and not helpful in setting out wider relevant information.</p> <p>I have referred to a previous draft of the Core Strategy in 2010/11 where appropriate to flag up where identified issues for concern have not since been fully addressed. I also refer to the Unitary Development Plan, the previous planning framework which contains valuable safeguards for recreation space, which need to be maintained, and to the 2012 Supplementary Planning Documents for Woolwich and Charlton which were adopted before this Core Strategy consultation.</p> <p>2. Charlton Riverside - Industrial Land loss</p> <p>This relates mainly to Policy EA2 Charlton Riverside, supporting paragraphs 4.2.7-9 and Map 7 in the 2013 Core Strategy</p> <p>and to Policy EA1 Economic Development and Policy E1 Carbon Emissions</p> <p>The planned removal of extensive industrial land along Charlton riverside for 'high-value' residential development is not properly researched. It was admitted by Chris Roberts at the Council Committee meeting which agreed the Supplementary Planning Document that local working businesses had not been consulted as they should have been. In the Draft Core Strategy with Development Management Policies 2010-11 Greenwich say, 'Evidence shows that there is a declining demand for industrial land and therefore it is more likely that under-used industrial sites will become</p>	<p>Keeping a significant amount of industrial capability may well prove desirable very soon, with economic development from small business initiatives being essential to encourage a pattern of industrial growth on all scales. The patterns of inter-related manufacturing, trade and distribution activity in Charlton are a model to build from, especially given that businesses there have survived without subsidy. Bank support for business development is difficult to find. Availability of affordable, unsubsidised premises is essential, within transport reach of communities and not relegated to the outer edges of London or beyond. A strategic location by the river preserves the possibility of increasing use of water transport for recycling, bulk freight and aggregates, alleviating air pollution. There are also small businesses with potential for growth in plastics and other materials recycling in Charlton at present.</p>			<a href="#">56</a>	

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						<p>derelict'. (Draft Core Strategy 2010 after 3.4.5)</p> <p>Yet there are a multitude of thriving businesses, many seeking to expand, now finding it difficult to get leases because the land owners wish to bank on higher prices for residential development. Greenwich's consultants have used misleading statistics - they quoted the whole amount of vacant industrial land in the borough as part of the 2012 Supplementary Planning Document consultation, implying that this land was in Charlton.</p> <p>In the 2010 Draft Core Strategy with Development Management Policies there are 3 'What if?' contingencies (Draft Core Strategy 2010 3.5.2) that question,</p> <p>- the delivery of the housing target of 25,950 in line with the Draft London Plan</p> <p>- the creation of a projected 21,000 new jobs</p> <p>- the delivery of critical infrastructure</p> <p>On Housing -</p> <p>"The current state of the housing market has led to concerns that the industry will not be able to deliver this level of development." (Draft Core Strategy 2010 3.5.3)</p> <p>Possible implications -</p> <p>"A slower rate of growth will reduce the number of residents shopping locally, hindering Woolwich Town Centre's ability to prevent expenditure leakage to other centres." (Draft Core Strategy 2010 3.5.6)</p> <p>" A slower rate of growth may reduce the demand for infrastructure which may undermine the ability of the Council to secure commitment and funding for infrastructure projects." (Draft Core Strategy 2010 3.5.7)</p> <p>The types of regeneration that Greenwich are depending on are contingent on market uncertainties.</p> <p>On Jobs -</p> <p>The 2012 SPD for Charlton riverside made reference to new jobs in 'smart' and 'creative' industries. It gave no indication of the sources for this projection. The Draft Core Strategy talked of alternative 'mixed-use' development for Charlton riverside, which would permit more industrial use to continue where it is successful. The map produced for the</p>					

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						<p>SPD, however, wipes out all of the industrial estates between the Thames Barrier and Anchor and Hope Lane. If proper consultation had been done with local industry throughout the process, a more balanced strategy could have emerged, rather than an 'all eggs in one basket' dependence on the housing market. Where is the subsequent Employment Land Review (URS, 2012) listed but not appearing in the supporting documents? This does not appear to be online in the supporting documents.</p> <p>As the 2010 Draft Core Strategy says, referring to the Sustainability Appraisal,</p> <p>"If Greenwich retains its industrial land, the Borough may attract additional economic growth from business and industrial sectors. However, this would mean that valuable opportunities for residential-led regeneration would be lost." (Draft Core Strategy 2010 after 3.4.5)</p> <p>Yet it also says,</p> <p>"once land is used for residential purposes, it is much more difficult to revert it back to industrial land should that be necessary or desirable in the future." (Draft Core Strategy 2010 after 3.4.5)</p> <p>And the 2013 Policy EA1 Economic Development says,</p> <p>"The Council supports the expansion of existing businesses and increased employment opportunities. New, high quality jobs that meet the needs and skills of local people will be created by: ....</p> <p>Increasing employment opportunities in the new and emerging low carbon sectors and advanced manufacturing;"</p> <p>Keeping a significant amount of industrial capability may well prove desirable very soon, with economic development from small business initiatives being essential to encourage a pattern of industrial growth on all scales. The patterns of inter-related manufacturing, trade and distrubution activity in Charlton are a model to build from, especially given that businesses there have survived without subsidy. Bank support for business development is difficult to find. Availability of affordable, unsubsidised premises is essential, within transport reach of communities and not relegated to the outer edges of London or beyond. A strategic location by the river preserves the possibility of increasing use of water transport for recycling, bulk freight and aggregates, alleviating air pollution. There are also small businesses with potential for growth in plastics and</p>					

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						<p>other materials recycling in Charlton at present.</p> <p>"Increased competition from...Canary Wharf and...Stratford may impact on the level of office development.... Woolwich town centre may be impacted on by competition from other retail centres ... In addition, reduced public spending over the early part of the plan period is likely to impact on jobs locally where nearly 40% of employment is in the public sector. In the current economic climate, it is unlikely that the private sector will be able to create sufficient jobs locally in this time scale." (Draft Core Strategy 2010 3.5.10,11)</p> <p>Now is not the time to be blighting an industrial area without considering the job losses entailed. These have not been officially quantified, but from local observation must be in the thousands. There are about as many jobs being lost in Charlton as the 3500-5000 new homes being planned.</p> <p>"If the borough's job targets are not met, this will limit the employment opportunities for local residents. There would be an increase in the levels of worklessness, with greater reliance on state benefits, increases in levels of child poverty, impacts on physical and mental health and reduced spending in the local economy with subsequent increases in business closures and potential increases in crime rates." (Draft Core Strategy 2010 3.5.12)</p> <p>On Infastructure -</p> <p>Also from the Sustainability Appraisal,</p> <p>"The lower likelihood of the provision of public transport in the Charlton Riverside area is likely to encourage the use of private vehicles which conflict of the national and regional policy of creating sustainable communities and patterns of urban development." (Draft Core Strategy 2010 after 3.4.5)</p> <p>This is presented as a factor against retaining industry. It is surely a far greater factor against introducing a commuter-based residential district. There is no properly researched plan projected to improve public transport links to Charlton riverside in either case.</p> <p>Woolwich Road is one of the most polluted in London.</p> <p>The plan includes a college for apprentices, already built, and a proposed school on Woolwich Road. Is this the best site, taking a long-term considered view on environmental issues?</p>					

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						<p>"The plans for Charlton would need to be reviewed if there are no improvements to public transport in the waterfront area."</p> <p>(Draft Core Strategy 2010 3.5.20)</p> <p>Projected river crossings will not improve public transport along Woolwich Road, and more local riverside transit options have not been followed up.</p>					
Paragraph	4.2.12	166972	Cathedral Group	Yes	No	<p>Cathedral Group supports RBG in its identification of the safeguarded Tunnel wharf for potential release and redevelopment and will work with RBG, the PLA and the GLA over the medium to long term to understand and realise this goal when the opportunity arises.</p> <p>It is noted that, recognition should be given in the paragraph that the defined boundary of the existing safeguarded Tunnel Glucose Wharf is due to be redrawn so that it will be to the immediate north of the current designation. This change forms part of the GLA's Safeguarded Wharves review process that is underway. The submission document to CLG (March 2013) shows that Tunnel Glucose Wharf will be 'flipped' from a 'southern' position to a 'northern' position under a revised Directive from the Secretary of State. This flipped position has been supported by the Port of London Authority.</p>	The paragraph should recognise that the safeguarded wharf is proposed to be relocated from its current location, subject to approval of the Secretary of State. This will ensure the details of the DPD are accurate and effective.	188810		Nathaniel Lichfield and Partners	<a href="#">492</a>
Paragraph	4.2.17	763263		Yes	No	The paragraph refers to suitable uses within SIL as being those set out at London Plan policy 2.17 and paragraph 2.79 this should also refer to paragraph 2.84 of the London Plan which highlights that policing and other community infrastructure as being appropriate.	Paragraph 4.2.17 '...and paragraph 2.79 and 2.84 of the supporting text'	188443	Mr Brian Coughlan	CGMS Consulting	<a href="#">516</a>
Paragraph	4.2.21	634115	Mr James Blakey	Yes	No	The document should reference the Royal Greenwich destination management organisation.	The document should reference the Royal Greenwich destination management organisation.				<a href="#">269</a>
Paragraph	4.2.25	763263		Yes	No	It is not clearly defined what services or employment relate to.	Paragraph 4.2.25 should be expanded to define what is acceptable on les. Employment generating uses could be defined as 'non residential uses that generate employment including community infrastructure'.	188443	Mr Brian Coughlan	CGMS Consulting	<a href="#">515</a>
Town Centres	4.3	502660	LXB Retail Properties PLC	Not specified	No	The information set out in Section 4.3 of the draft Core Strategy is based on the 2008 Core Strategy, prepared by GVA. As set out above, this Study was undertaken against the backdrop of previous planning policy PPS6, and towards the start of the economic downturn. As such, the figures set out in Paragraph 4.3.5 are based on out-of-date information, and are thus unsound.		445293	Mary Davidson	WYG Planning	<a href="#">274</a>

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						We would suggest that an update to the Retail Study be prepared ahead of the examination stage to take account of current growth rates and policy guidance contained within the NPPF. Furthermore, until an up-to-date assessment has been undertaken, it is not possible to determine whether the majority of the identified need can physically be incorporated in Woolwich town centre, as envisaged in policy TC2.					
Town Centres	4.3	759983	Ms Rinaani Musutua	Not specified	Not specified	Policies TC1 – TC6 over-emphasises high density development in the major centres such as Woolwich. They do not provide neighbourhood based investment and locally sensitive action to address social deprivation the most deprived areas such as Thamesmead. Recognising accessibility is a key concern. The absence of town centre health checks means there is no evidence of how far the existing town centres meet the requirements of sustainable communities and lifetime neighbourhoods. The supporting evidence base (4.3.36) is weak. Families still have to travel outside Thamesmead to access affordable retailers	More attention needs to be given to district and local centres to support a more dispersed pattern of economic activity, including sourcing and local procurement. To be consistent with lifetime neighbourhoods, the policy should include local needs index of the shops, social and community facilities which are accessible to everyone e.g. within easy walking distance and measure to ensure access to older and disabled residents. All categories of different town centres need to be protected as employment centres, putting jobs closer to homes and supporting sustainable communities.				<a href="#">279</a>
Town Centres	4.3	760660	Sally Miles	Not specified	Not specified	<p>CgMs welcomes the active approach taken to promoting substantial redevelopment throughout the Borough and agree that there are significant opportunities for further residential and commercial development including traditional employment, retail and leisure provision. Indeed, the strategy recognises the significant role leisure and retail facilities play within the Greenwich area.</p> <p>It is acknowledged that the authority should seek to support town centres and to promote new district centres to provide facilities for local residents.</p> <p>However, the policy framework should also enable individual proposals that may come forward during the lifetime of the Core Strategy to be determined on their own merits. It is not possible to envisage all potential retail and commercial opportunities that may come forward during the plan period. Some specific retail operators may identify specific requirements for the area which can provide valuable services to residents and can also provide significant employment opportunities more than comparable to traditional employment uses. The Plan should incorporate a criteria based policy reflecting the standard criteria contained within the NPPF to enable proposals to be considered on their own merits.</p> <p>In addition, there are a number of existing retail parks which serve the needs of the area. Existing retail parks</p>					<a href="#">374</a>

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						should be identified and allocated and policy should support proposals to redevelop or enhance the facilities provided within these established retail locations.					
Paragraph	4.3.4	147465	Graham Saunders	Not specified	Not specified	<p>In the supporting text reference should be made to the heritage value of the Royal Borough's</p> <p>town centres. For example where reference is made to the creation of a strong community</p> <p>identity and ensuring the delivery of high quality design, the contribution of the historic</p> <p>interest of these centres should be identified and embraced as part of delivering enhanced</p> <p>local character and good responsive design. This approach reflects the NPPF (para 58).</p>					<a href="#">189</a>
Paragraph	4.3.5	501408	Mr John Franklin	Not specified	No	The estimated retail capacity, given as “between 20,700m2 to 41,700m2 for the Borough up to 2028”, is the same as stated in the Draft Core Strategy for up to 2017 – and yet the Support information is exactly the same in both documents.	An explanation should be given.				<a href="#">136</a>
Paragraph	4.3.6	147698	Laurie Baker	Not specified	Not specified	The Society also concurs with paragraphs 4.3.4 that development should be of very high quality design in town centres but that this aim should be applied in all parts of the borough, and 4.3.6 that the sequential approach will be followed to prioritise development in existing town centres. These are very two important areas for maintaining and enhancing town centres in the borough.	However, this must be followed through with detailed policies and supplementary planning documents that promote high quality development and enhance Eltham Town Centre. The Masterplan for Eltham adopted in April 2012 is a supplementary planning document (SPD) not a policy document. Whilst it set out a vision for the town centre the Core Strategy should be strengthened to give a better basis for the SPD. Additionally, guidance should be prepared to promote high quality development and streetscape that will enhance the town centre and the wider Eltham area.				<a href="#">152</a>
Paragraph	4.3.18	760183	Cllr Spencer Drury	Not specified	Not specified	Section 4.3.18 seems to me to make a range of deeply suspect statements and these need to be justified prior to inclusion in this document. I can see no reason to suggest that “Eltham Town Centre would benefit from a mix of residential uses and facilities” as the following suggestion that this would lead to extended opening hours or improved safety and security does not seem to follow.					<a href="#">313</a>
Paragraph	4.3.29	148409	Ms Rose Freeman	Not specified	Not specified	<p>Thank you for including the Greenwich Theatre in para.4.3.29 – it is an important venue that provides an essential contribution to your evening economy.</p> <p>Paragraph 4.3.29 states ‘...uses comprise of ...’ This is grammatically incorrect – ‘of’ does not follow the word</p>					<a href="#">263</a>

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						‘comprise’.					
Paragraph	4.3.30	501408	Mr John Franklin	Not specified	No	There is an omission in this paragraph in as much that there is no reference to the fact that the Council is undertaking a review of the scope for improving the pedestrian experience and traffic management within Greenwich Town Centre. Yet the Infrastructure Delivery Plan, ‘Picture 2.2 Current proposals and future requirements for transport infrastructure’ (p,15) gives ‘Greenwich Town Centre pedestrianisation’ as a ‘current proposal’.	The paragraph should include a statement to the effect that the Council is undertaking a review of the scope for improving the pedestrian experience and traffic management, taking account of the need to avoid major traffic diversion on to the A2.				<a href="#">138</a>
Paragraph	4.3.35	501408	Mr John Franklin	Not specified	No	The Core Strategy states that “Retail development in North Greenwich should be of an appropriate size for a District Centre. Total retail floorspace within the Centre should not exceed the typical upper floorspace figure for a District Centre of 50,000sqm as set out in the London Plan. 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 had requested an explanation as to how the intention stated in the Draft Core Strategy to ‘ensure’ that the then ‘restriction to 22,800 sqm as set out in the Greenwich Peninsula Masterplan’ was to be achieved. This appears to be ignored in the Council’s response in its Who Said What? Consultation Portal. Now the permissible expansion figure has almost doubled, with no explanation or reasoning for this being given in the Support statement, especially needed in the light of the reduced number of additional dwellings now calculated for the 15-year period 2013 – 2028, and an explanation of this really is needed.	Explanation should be given.				<a href="#">139</a>
Paragraph	4.3.37	501408	Mr John Franklin	Not specified	No	The Society welcomes the inclusion of this new paragraph in the Core Strategy under Policy TC6 Other District Centres, dealing with East Greenwich, noting the comment, “Some of the shop fascias could benefit from being upgraded particularly towards the eastern end of the centre.” However, in the Development Management Policies section, there is no encouragement given and no indication as to how the upgrading might be achieved: this is merely a pious hope: the Greenwich Society would have hoped for something more positive here (and for the other Centres). Also, no reference is made to the Heart of East Greenwich now under construction, and perhaps some comment on this should be included.	A statement should be included saying what action the Council intends to take regarding encouraging the upgrading of the shop fascias here. Also, reference should be made to the Heart of Easy Greenwich currently under construction.				<a href="#">140</a>
Paragraph	4.4.1	757596	The Charlton Society	Yes	No	The Council and its departments are not formally obliged to apply high and professional standards of design to their work in and for the existing urban fabric.	The Council and all departments whose work has a visual impact on the existing urban fabric – from pavements to parks and from signage to housing – must apply the highest possible standards of professional design at all times.				<a href="#">50</a>
Paragraph	4.4.27	501408	Mr	Not specified	No	The statement of Outstanding Universal Values for the WHS was to have been agreed in 2012. This lack of	Update wording of this paragraph, and set a target date for adopting Outstanding Universal Values.				<a href="#">142</a>

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			John Franklin			progress calls into question the effectiveness of protection for the WHS. The wording of this paragraph is now out of date and needs to be revised					
Paragraph	4.4.31	501408	Mr John Franklin	Not specified	No	Para 4.4.31 states that the ‘Council assigns high importance to sustaining the Borough's cultural and natural heritage’ – and Para 4.4.32 states that the next review of the Management Plan will include an assessment of the Outstanding Universal Values. Yet the Council has abolished the dedicated post for work connected with the World Heritage Site and has only a team of two to look after the WHS and the Borough’s 20 Conservation areas. How is the Council to do this? No date is set for reviewing the Management Plan which was adopted in 2005.	State how the Council intends to act in ‘sustaining the Borough's cultural and natural heritage’ – and set a date for reviewing the Management Plan. Suggest, drawing on local voluntary effort to help achieve this and assist in implementation of the plan.				<a href="#">143</a>
Paragraph	4.4.32	501408	Mr John Franklin	Not specified	No	Para 4.4.31 states that the ‘Council assigns high importance to sustaining the Borough's cultural and natural heritage’ – and Para 4.4.32 states that the next review of the Management Plan will include an assessment of the Outstanding Universal Values. Yet the Council has abolished the dedicated post for work connected with the World Heritage Site and has only a team of two to look after the WHS and the Borough’s 20 Conservation areas. How is the Council to do this? No date is set for reviewing the Management Plan which was adopted in 2005.	State how the Council intends to act in ‘sustaining the Borough's cultural and natural heritage’ – and set a date for reviewing the Management Plan. Suggest, drawing on local voluntary effort to help achieve this and assist in implementation of the plan.				<a href="#">144</a>
Paragraph	4.4.73	634115	Mr James Blakey	Yes	No	Reference should be made to the cruise terminal at Enderby Wharf	Para 4.4.73 should be expanded to support policy DH (n) Floating Vessels to make it explicit that structures in the river will not be supported if they could potentially compromise the operation of the cruise terminal at Enderby Wharf				<a href="#">270</a>
Open Space	4.5	147465	Graham Saunders	Not specified	Not specified	It is important to ensure that the heritage interest of the Royal Borough’s open spaces are  explicitly identified and considered in any development assessments and proactive  management strategies. For example parts of the Metropolitan Open Land (policy OS2), and  the London Green Chain (policy OS3) include heritage interest, whether this is expressed  through designation (e.g. part of a conservation area, setting of a listed building, or as a  registered historic park and garden) or not. We would therefore advise that at both the  strategic level and in the development management policies the known and potential					<a href="#">202</a>

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						heritage interest of open spaces should be recognised and explicitly addressed as an issue  when considering the merits of proposals.					
Open Space	4.5	147498		Not specified	Not specified	<p>The university recognise that within the Proposals Map Changes consultation, the Metropolitan Open Land designation for the Avery Hill Campus, consisting of the Mansion Site and Southwood Site, remains unchanged. The key Policies of relevance within the Submission Version Core Strategy with Development Management Plans are therefore OS1, OS2, OS3 and Development Management Policy OS(a) which sets out the principles for the redevelopment, extension or change of use of existing built development whose primary function is not ancillary to the use of the adjoining open land.</p> <p>The university note the Core Strategy removes UDP Policy O3. Within this Policy, both the Mansion Site and Southwood Site at Avery Hill were designated as Major Developed Sites (MDS) and parameters for growth on the campus were established.</p> <p>While it is appreciated that the expansion of the site for educational facilities is no longer feasible and the Policy has been removed to reflect this, the university is concerned about the loss of designation as a MDS.</p> <p>In addition, it is considered that the loss of a specific policy on the future of the Avery Hill campus does not address the changes likely to take place within the higher education landscape over the life of the plan period. Indeed, the future of this site has evolved since the publication of the Draft Core Strategy in 2010. It is in this regard that the university seek the inclusion of a specific Policy addressing the future of the site within the Core Strategy which maintains the campus’ designation as a MDS. This Policy could maintain that infilling or redevelopment, which meets a certain criteria within the MDS, is not considered inappropriate development.</p> <p>Ultimately the university would like to seek assurance from the Council that the Core Strategy as it stands would not jeopardise any future plans for the potential redevelopment of this site within the life time of this plan period, 2028. In particular, while discussions have been held with the Planning Department and the Greater London Authority (Call for Sites Consultation) regarding the future of the Avery Hill Campus, representation within the Core Strategy would ensure the university are able to act flexibility within set parameters when establishing the future of both the</p>		188158	Mr Mark Underwood	Assistant Director Drivers Jonas Deloitte	<a href="#">357</a>

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						Southwood Site and the Mansion Site in their evolving estates strategy.					
Open Space	4.5	537756	Mr Richard Lee	Not specified	No	<p>The open space policies lack clarity and are neither well communicated nor justified. The titles of the policies should be much clearer. The suite of policies should start with a clear definition of the types of open spaces, especially in terms of private/public open space and green space. The policy seems dated, both by not including the results of the Greenwich Open Space Study and by not referring to NPPF requirements on local green space.</p> <p>The policies should then analyse what is threatening the current spaces, including the quality, lack of use, competition for land with housing, businesses. The open space deficiencies (and the contribution to this of population growth) should be clearly explained with statistics and predictions. They are inadequately mapped at present. Then policies can be introduced to improve the quantity and quality of open spaces.</p> <p>There is no policy for playspace, an essential part of open spaces, an aspect crucial to a cohesive and lifetime community. There are policies under health and housing, but these should be subsidiary to the main play policy being under Open Space. There should be reference to the play space specification that must be taken into account in a new development (quality, size and distance form home), for which reference to the Mayor of London’s SPG would be very helpful.</p> <p>A diversity of open spaces needs to be accentuated through the use of quantity, quality and accessibility standards as set out in Table 11.1 of the Open Space Study. Otherwise, developers will argue that a large park is already nearby, but they undervalue the need for diversity. Smaller parks create the opportunity for different types of activities and therefore support the community in another way. Often smaller parks will improve access to larger parks too.</p>				<a href="#">243</a>	
Open Space	4.5	717432	Mr Peter Varney	Not specified	Not specified	<p>I am a trustee of both the Charlton Athletic Community Trust and Samuel Montagu Youth Centre (SMYC). Both organisations own sites where there are areas of the sports grounds that are non green hard standing areas and in planning terms these areas are regarded as community open space and as such cannot be developed.</p> <p>In the case of SMYC in particular it faces a very unncertain future following the withdrawal of grant funding and it needs investment in the existing facilities to survive. There is an area of the SMYC grounds that houses a rugby clubhouse and there are some unused hard standing areas</p>					<a href="#">345</a>

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						<p>and adjacent to these areas is a set of disused garages owned by Royal Greenwich. If we were able to develop that area for say housing it would provide the finance to turn SMYC into a first class community facility and most importantly to secure its future.</p> <p>In my view the Council should have within its Core Strategy the ability to develop non green areas of a sports ground if the development leads to an enhanced community facility and indeed to save that facility. I have never understood why sports grounds are allowed to decline and then end up being sold and developed when there are more pragmatic and creative solutions available.</p>					
Open Space	4.5	755935		Not specified	No	<p>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.</p> <p>This position also remains unchanged from that of the previous Preferred Options consultation in 2010. It is considered that the approach to MOL boundaries and designations is unsound as the current draft CSDMP document is based on out of date and incorrect evidence base, and is therefore not justified or effective.</p> <p>We understand that the RLBG Open Space Study (OSS) was undertaken in December 2007 and was published in 2009. This then underwent further minor amendments and was re-published in 2011. The purpose of the OSS was to assess the existing provision of open space, sports and recreation sites in the borough and to identify areas of deficiency and demand, forming part of the evidence base for the CSDMP document. This was to then inform an Open Space Strategy to guide related planning policy for the provision, protection and management of these spaces. The Open Space Strategy has not been published and there is therefore a lack of strategy to guide decisions on the designation and alteration of</p> <p>MOL sites and boundaries.</p> <p>The Site at Blackheath Park falls within a larger site identified in the OSS as Site 177. This does not take into account the TTS development proposals and incorrectly identifies the use of site 177 as being by that of the Old Addeyons Sports Club and the Densitron Site is grouped with that of the playing fields to the south. The OSS also incorrectly identifies the Site as being within the Blackheath Park Conservation area, where as it actually lies outside and adjacent to the Conservation Area boundary.</p>		755933	Mr Mark Novelle	Planning Deloitte Real Estate	<a href="#">377</a>

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						<p>The OSS also fails to recognise the UDP policy allocations for the redevelopment of the TTS and site h5 identified for housing development in connection with the Kidbrooke area redevelopment, despite this being adopted in 2006, prior to the OSS assessment being undertaken.</p> <p>Another shortfall of the OSS is that it only assesses open space requirements to 2025 when the plan period for the CSDMP document is to 2028. It is contended that an update of the OSS and MOL boundaries and designations 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 release from the MOL.</p>					
Paragraph	4.5.1	757514	RAGED Residents  RAGED  RAGED	No	No	<p>The Legality, Word, Spirit and intent of the National Planning Policy Framework have not been fully and accurately represented in this section of the DPD.</p> <p>Below are relevant quotations from the NPPF that have not been properly integrated and reflected :-</p> <p>National Planning Policy Framework</p> <p>Rt Hon Greg Clark MP</p> <p>Minister for Planning Quote :-</p> <p>Our natural environment is essential to our well being, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.</p> <p>Core planning principles</p> <p>17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and</p> <p>decision-taking. These principles are that planning should:</p> <p>●● be genuinely plan-led, empowering local people to shape their</p> <p>surroundings, with succinct local and neighborhood plans setting out a</p>	<p>The DPD should properly reflect the Legality, Word, Spirit and intent of the National Planning Policy Framework which has not been fully and accurately represented in this section of the DPD.</p> <p>Below are relevant quotations from the NPPF that have not been properly integrated and reflected.</p> <p>These parts of the NPPF should be properly integrated and reflected in the DPD:-</p> <p>National Planning Policy Framework</p> <p>Rt Hon Greg Clark MP</p> <p>Minister for Planning Quote :-</p> <p>Our natural environment is essential to our well being, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.</p> <p>Core planning principles</p> <p>17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and</p> <p>decision-taking. These principles are that planning</p>			<a href="#">26</a>	

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						<p>positive vision for the future of the area. Plans should be kept up-to-date,</p> <p>and be based on joint working and co-operation;</p> <p>●● not simply be about scrutiny, but instead be a creative exercise in finding</p> <p>ways to enhance and improve the places in which people live their lives;</p> <p>●● take account of the different roles and character of different areas,</p> <p>promoting the vitality of our main urban areas, protecting the Green Belts</p> <p>around them, recognising the intrinsic character;</p> <p>●● contribute to conserving and enhancing the natural environment and</p> <p>reducing pollution. Allocations of land for development should prefer land</p> <p>of lesser environmental value, where consistent with other policies in this</p> <p>Framework;</p> <p>●● encourage the effective use of land by reusing land that has been</p> <p>previously developed (brownfield land), provided that it is not of high</p> <p>environmental value;</p>	<p>should:</p> <p>●● be genuinely plan-led, empowering local people to shape their</p> <p>surroundings, with succinct local and neighborhood plans setting out a</p> <p>positive vision for the future of the area. Plans should be kept up-to-date,</p> <p>and be based on joint working and co-operation;</p> <p>●● not simply be about scrutiny, but instead be a creative exercise in finding</p> <p>ways to enhance and improve the places in which people live their lives;</p> <p>●● take account of the different roles and character of different areas,</p> <p>promoting the vitality of our main urban areas, protecting the Green Belts</p> <p>around them, recognising the intrinsic character;</p> <p>●● contribute to conserving and enhancing the natural environment and</p> <p>reducing pollution. Allocations of land for development should prefer land</p> <p>of lesser environmental value, where consistent with other policies in this</p> <p>Framework;</p> <p>●● encourage the effective use of land by reusing land that has been</p> <p>previously developed (brownfield land), provided that it is not of high</p> <p>environmental value;</p>				
Paragraph	4.5.1	148404	Mr Terry Powley	Not specified	Not specified	I am writing on behalf of the Greenwich Parks Forum, a network of 24 Friends of Parks groups in the Royal Borough. The Forum works closely with the Council to safeguard and enhance the much valued parks and open spaces in Greenwich.					<a href="#">208</a>

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						<p>In the light of its own priorities, the Forum particularly supports and applauds paras 4.5.2 (Policy OS1 Open Space); 4.5.8 (Policy OS2 Metropolitan Open Land); 4.5.11 (Policy OS3 South East London Green Chain); and 4.5.14 (Policy OS4 Biodiversity).</p> <p>But, while supporting without any reservation the Council's fine aspirations, the Forum wishes to put on record its misgivings about the extent of the Council's commitment in practice to the safeguarding of Open Space and Metropolitan Open Land. There is an increasing number of planning decisions that place service requirements, such as those of a school or a hospital, ahead of the safeguarding of open spaces and Metropolitan Open Land. The Forum therefore appeals to the Council to be consistent in its upholding of its own declared policies.</p>					
Paragraph	4.5.2	757304	Mr Ken Hobday	Yes	No	<p>Statement 4.5.2 and Policy OS1 Open Space are in my view are weak, ineffective and unsound because they are limited in their aims and do not go far enough in seeking to protect and enhance the Borough's Green Spaces, nor do they go far enough in protecting the Borough's increasingly threatened and declining biodiversity.</p> <p>Because of the constant and continual development taking place throughout the Borough, there needs to be far more stronger, more comprehensive Policies to strengthen the ability both to create more Green Space throughout the Borough and to protect existing Green Space. Green Space is constantly being eroded by development of one sort, or another and the Borough's biodiversity is under an ever increasing threat.</p> <p>Therefore I believe these proposed policies, being little different to previous Council policies, which failed to protect Green Space, the environment and its biodiversity, need to be completely overhauled and considerably strengthened. They have failed in the past and being little different from past policies, they will fail again.</p>	<p>Statement 4.5.2 should state :</p> <p>that all new development should make provision for ecologically enhanced Green Space to be created, where ever it may be within the Borough, so as to create a Borough wide linked mosaic of ecologically enhanced Green Spaces running throughout the Borough to support the Borough's biodiversity and to create a network of linked Green Spaces running across and throughout the Borough, creating Green Corridors and a linked mosaic of ecologically enhanced Green Space.</p> <p>This should be an important part of the Open Space Strategy and of my idea of creating a comprehensive Borough Wide Green Infrastructure.</p>				<a href="#">53</a>
Paragraph	4.5.5	757304	Mr Ken Hobday	Yes	No	<p>I believe the Borough's Open Spaces Strategy does not go far enough in recognising the potential that Parks and Green Spaces play in providing habitat of our increasingly threatened and declining wildlife. Therefore our Parks and Green Spaces should be ecologically enhanced and improved for wildlife where ever it is suitable, possible and appropriate to do so and that this should be a default position in their management. With our wildlife under an ever increasing threat from loss of habitat our Parks and Green Spaces play an increasingly important part in providing space and habitat for our constantly declining wildlife and</p>	<p>I believe to help support the Borough's increasingly threatened and declining wildlife statement 4.5.5 should clearly state the The Open Space Strategy should seek the ecological enhancement and improvement of Parks and Green Spaces where ever it is suitable, possible and appropriate to do so, unless there is a good reason otherwise not to do so and that this should be a default position in the management of Parks and Open Spaces.</p>				<a href="#">54</a>

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						<p>therefore are increasingly important for wildlife and should recognised for do this and managed accordingly.</p> <p>I believe to help support the Borough's increasingly threatened and declining wildlife statement 4.5.5 should clearly state the The Open Space Strategy should seek the ecological enhancement and improvement of Parks and Green Spaces where ever it is suitable, possible and appropriate to do so, unless there is a good reason otherwise not to do so and that this should be a default position in the management of Parks and Open Spaces.</p> <p>This would help protect and enhance the Borough's increasingly threatened wildlife</p>	This would help protect and enhance the Borough's increasingly threatened wildlife				
Paragr aph	4.5.12	147698	Laurie Baker	Not specified	Not specified	Paragraph 4.5.12 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, was never completed and adopted).					<a href="#">157</a>
Paragr aph	4.5.28	537756	Mr Richard Lee	Not specified	No	We object to the quantity standard in 4.5.28 of 3 ha per 1000 people compared with current provision of 3.8 ha/1000people (as referred to in the Open space Study). This illustrates how green infrastructure is not being provided for within the planned growth.					<a href="#">247</a>
Paragr aph	4.5.30	489241	Mr Francis Lee	Yes	No	<p>“4.5.30. Local Authorities are required to consult with Sport England where development proposals may affect a playing field or land last used as a playing field in the last five years. ....”</p> <p>The statement is considered inadequate for the following reason:</p> <p>The owners of certain sportsfields in the Borough have deliberately kept them unused for periods now exceeding five years. In the event of an application to develop there would be no requirement to consult or otherwise determine the potential demand for sporting or other community use for these fields.</p> <p>There are two playing fields in Eltham which have been unused for more than five years because the owners have deliberately ignored requests to lease or purchase them for sporting purposes. They are Land to the Rear of 132-134 Avery Hill Road, known as the Gaelic Sportsfield, derelict since 1992, and the Bardhill Sportsfield in Footscray Road, unused for any purpose since 2001.</p> <p>As the clause stands, in the event of a planning application to develop for housing there would be no need to establish</p>	<p>The inclusion of a clause to the effect:</p> <p>“Where a sportsfield has been disused for more than five years and it it can be shown that attempts to bring it back into use have been deliberately rejected or ignored the applicant must show that the field has been advertised nationally and there are no viable users in accordance</p> <p>with its status as Metropolitan Open Land or Community Open Space.”</p>				<a href="#">129</a>

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						<p>whether there is a viable demand for sporting or other permitted use within use within the designations Community Open Space or Metropolitan Open Land. In 2007, following an inquiry, an application to build on the Gaelic Sportsfield was rejected by the Secretary of State for Communities and Local Government</p> <p>(ref APP/E5330/A/06/2018048), one of the grounds being that the market for use as a sportsfield had not been tested. The applicant appealed to the High Court (Citation Number [2008]EWHC 2136 (Admin)), where the claim was dismissed, a reason again being the lack of market testing .</p> <p>It is recommended that in circumstances where it can be shown that use of a sportsfield has been deliberately prevented the planning applicant should advertise the availability of the land in the national press for sale for use in accordance with its designation of Community Open Space or Metropolitan Open Land. There could be sports clubs, or other organisations, outside the Borough that would wish to use it, e.g. a horticultural society as Para 4.7.28 says that there is a shortage of allotment space, or a fully enclosed field could be suitable for an outdoor museum.</p>					
Paragr aph	4.5.31	489241	Mr  Francis  Lee	No	No	<p>“4.5.31. The emerging Open Space Strategy found that there are 252 sports pitches throughout the Borough. The Borough is currently well provided in terms of football pitches and senior rugby pitches, however there is an under supply of cricket and junior rugby pitches.”</p> <p>The statement gives a misleading impression in respect of senior football pitches.</p> <p>The Council is the largest provider of pitches, these being in the public parks and of minimum size. There is a low risk of development and the consequent loss of a significant number of these pitches.</p> <p>Teams in the higher divisions of local leagues are required to play on larger pitches and to have ancillaries such as covered benches adjacent to the pitch for the coaches and substitutes.</p> <p>The MASA ground off Avery Hill Road is home to two such football teams, a cricket club and a running club.</p> <p>There has been a sharp increase in women’s teams playing football, but there are few grounds that have suitable dressing rooms.</p>	<p>It is recommended that the clause be amended to read as follows:</p> <p>“4.5.31. The emerging Open Space Strategy found that there are 252 sports pitches throughout the Borough. There is a sufficient supply of minimum size football pitches and an adequate supply of those providing higher standards. The Borough is well provided with senior rugby pitches, but there is an under supply of cricket and junior pitches.”</p>			<a href="#">130</a>	

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						<p>The availability of such footballing facilities in the Borough is currently adequate, but a reduction in the number would lead to shortage. The grounds where these are available are nearly all owned by clubs, private individuals, companies or trusts, and there is a high risk of them seeking to develop as there is great financial incentive to do so.</p> <p>The population of the Borough is predicted to increase by 19% by 2026, so the demand for football pitches can be expected to increase.</p> <p>For these reasons any application to develop grounds with the capability of providing the necessary facilities for the higher divisions of local football leagues and/or for women’s teams should take account of the overall availability relative to demand.</p>					
Paragr aph	4.5.32	502194	Waite	Yes	No	There is insufficient detail/explanation to back up the huge change between UDP map 6 and the core strategy map (page 122). Large areas which were regarded as being in wildlife deficiency areas have been removed, although there has been no change in the number of accessible wildlife sites since the UDP was adopted. Why the change? It leads to a conclusion of expediency so that RBG does not have to continue to commit to securing more wildlife sites and greater accessibility. Even where 'accessible' sites exist they are not accessible to all (e.g. anyone using some form of wheeled assistance be it wheel chair or child's buggy.	<p>If you do not justify exactly why the wildlife deficiency map has been altered so dramatically, you are letting down the residents.</p> <p>There should be scope to reinstate the coverage shown in UDP map 6, otherwise RBG is backing away from any position of environmental improvement and protection.</p>				<a href="#">438</a>
Paragr aph	4.5.33	757304	Mr  Ken  Hobday	Yes	No	The Council should consider all areas deficient in wildlife and so should be taking measure to enhance wildlife across the Borough not just in certain areas.	The Council should consider all areas deficient in wildlife and so should be taking measure to enhance wildlife across the Borough not just in certain areas.				<a href="#">59</a>
Paragr aph	4.6.43	502194	Waite	Not specified	No	<p>RBG's position flies in the face of research by the LAQN which regularly records high air pollution (e.g. 8-10 April 2013). RBG has also been unable (by virtue of timing) to take into account the 1/5/13 ruling by the supreme court (UK in breach of article 13 of EU air quality directive). Sustainability appraisal section 5.1.2 is very clear about problems in developing Charlton Riverside (lack of public transport) leading to increased air pollution in Charlton as a whole.</p> <p>Para 4.6.43: Does nothing to improve air quality as the design mitigation hierarchy is only for residential development. What about schools and places of employment? These and many other types of use are at risk from being too close to major sources of air pollution.</p>	<p>If there is no provision to tackle air pollution as it affects everyone in their daily life, then many people are being condemned to bad health and premature death.</p> <p>There is a pressing need for RBG to be much more vigorous in its approach to securing reductions in air pollution. Policy E (c) should have the final para revised to state that all development .....must take into account...etc</p> <p>Para 4.6.46 should not be concerned solely with residential exposure but should reduce exposure in all usage categories.</p>				<a href="#">440</a>
Paragr aph	4.7.11	501408	Mr	Not specified	No	The paragraph states that “Community facilities..... can include...”: it is really only a list of a number of types of	The Council should give a commitment as to the provision of these facilities. Changes should				<a href="#">146</a>

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			John Franklin			facility and indicates no intentions. There is no commitment attached to the provision of any of the facilities listed. The following paragraph, para 4.7.12, would appear to address these concerns, referring to an ‘Infrastructure Delivery Plan’, but it doesn’t. We particularly welcome mention of ‘Facilities for youth provision’, considering such socially necessary and able to play an important part as a diversion from potential anti-social behaviour.	include a stated minimum of intent to provide community facilities in the Borough.				
Paragraph	4.7.12	501408	Mr John Franklin	Not specified	No	The paragraph refers to, “Greenwich's Infrastructure Delivery Plan” as providing “more detail on the requirements within the Borough” for many of the facilities referred to in the preceding paragraph, but it says no more, and gives no cross-reference with regard to access to the Infrastructure Delivery Plan (IDP). Also, a definition should be given regarding ‘facilities for youth provision’. The Greenwich Society is particularly concerned over lack of any commitment to providing facilities for youths, and a virtual absence of such facilities in the Society’s area. We note that the IDP only mentions the term ‘Community facilities with no definition of what this term implies: certainly, there is no mention of ‘facilities for youth provision’, and consider that Section 3.7 of the IDP should rectify this.	A direct cross-reference to the Infrastructure Delivery Plan should be made here and more information supplied in the interests of ‘soundness’ and to justify the requirements within the Borough for the facilities listed. Also, clear definitions should be given in the IDP of ‘Community facilities’, including ‘facilities for youth provision’.				<a href="#">147</a>
Paragraph	4.7.17	148464	Mr Lawrence Smith	Yes	No	We agree that community facilities should be fit for purpose. However, there may be cases where existing dwelling houses can be converted without leading to social disruption.	In the second sentence, insert "normally" after "not".				<a href="#">41</a>
Paragraph	4.7.18	148464	Mr Lawrence Smith	Yes	No	It is not fully effective because it makes no reference to cases where the Council can have a direct influence on the maintenance of such local services, eg through rents or parking policy.	Add the sentence "Where the Council has a direct influence on such provision, eg through rents or parking policies, it should operate to maintain these local services."				<a href="#">43</a>
Infrastructure and Movement	4.8	502660	LXB Retail Properties PLC	Not specified	No	In this chapter the Council acknowledge that the physical, social and green infrastructure needs to be provided at the right time and place. It is also noted that as well as setting out a mechanism to secure private sector involvement in infrastructure delivery, it needs to tie this in with the programmes of other providers such as TfL and the provision of a rapid bus service to replace the Greenwich Waterfront Transit. Much greater visibility is needed on how the delivery of these critical infrastructure projects will happen and be co-ordinated with the delivery of housing and employment growth.		445293	Mary Davidson	WYG Planning	<a href="#">277</a>
Paragraph	4.8.1	147829	Ms Anna	Not specified	No	The Open Space Strategy is unpublished (p153/para 4.7.28). The high level of new homes proposed (29,078 minimum) are unsustainable as is the expected population increase (which exceeds the London and National average), (for)	A large reduction in forecast housing growth generated by settlement from outside the borough.				<a href="#">352</a>

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			Townend			whicch the Housing is planned to accommodate. Greenwich's own natural increase needs are only a small part of this excessive target and London's growth (which is the given need) could reverse with government policy changes within the core strategy time-frame. This possibility, as a "sustainability alternative" should be identified as a green strategy policy in tandem ie. "limits to growth" options to each strategic policy should be given in the submission version of the core startegy and cover the Opportunity Areas of Greenwich Peninsula, Woolwich, Charlton Riverside, Deptford Creek/Greenwich Riverside.					
Paragr aph	4.8.1	147829	Ms Anna Townend	Not specified	No	Current development proposals for new housing cannot be serviced by existing rail/bus infrastructure. An appropriate light rail/tram system proposed to link the Millenium Village (Greenwich Peninsula) to other parts of the Borough was not implemented, and the need for this remains.	To extend the Blackwall Lane jubilee line connection (via existing "spur") to Silvertown/put the motorway in tunnel.				<a href="#">364</a>
Paragr aph	4.8.3	147829	Ms Anna Townend	Not specified	No	The impact of the extensive "new urbanisation" (by the RBG planniing policies) currently being implemented with over 70% of consents still pending completion has put at risk the borough's biodiverse inheritance. For the survival of species in urbanizing expansion and for future generations and community health and wellbeing this must be halted.	A moratorium on further implementation of current tower block consents for 1-2 bed flats along the River Thames corridor pending a "carrying capacity" of the land evaluation and a habitat creation policy adoption. Strengthening the current Biodiversity Action Plan which is disregarded by RBG and developers alike.				<a href="#">356</a>
Paragr aph	4.8.5	502194	Waite	Yes	No	We are concerned that the riverside development will founder financially and impact adversely on the rest of charlton, RBG is not the major infrastrucutre provider, but needs to place much greater pressure on developers/TFL etc to come up with the goods. It is no use saying planning conditions will ensure suitable infrastrucutre as these are frequently varied down the line (if not broken entirely) and the end result bears no resemblance to original plans. Flexibility to suit circumstances sounds fine but gives too much wriggle room. Just think of the reductions to social housing provision which are being allowed because developers say they can not get the backing unless the social housing component is reduced.	Amend the final sentence of para 4.8.5 so that provision of infrastructure is always required prior to the completion of a development. Also specify a point in the progress of a development by which infrastructure most be in place e.g. by the halfway stage.  If this is not done, those in new developments could be stranded for years without adequate infrastructure. This will put intolerable strain on the rest of use leading to bad feeling and the possibility of unrest.				<a href="#">442</a>
Paragr aph	4.8.21	265434	Carmelle Bell	Not specified	Not specified	The text within Section 4.8.21 is out of date and makes reference to the Thames Tunnel project, which has been renamed the 'Thames Tideway Tunnel'. The reference to the project for which an application for a Development Consent was accepted by the Planning Inspectorate on the 27th March 2013 is supported, however the document should be updated to refer to the updated name of 'Thames Tideway Tunnel project'.					<a href="#">85</a>
Monit oring Frame	Appendix 1	167229	Ms Lucy	Yes	No	It is of note that the monitoring framework contains no monitoring indicators of the number of people and the amount of freight transported by water, despite the	Include monitoring indicators relating to the number of people and the amount of freight transported by water				<a href="#">353</a>

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work			Owen			Council's desire to see an increase in both					
Documents of the Evidence Base	Appendix 5	630863	Transport for London	Not specified	Not specified	<p>Infrastructure Delivery Plan</p> <p>Current Proposals- Paragraph 2.1.24-2.1.26</p> <p>TfL notes proposals to implement a pedestrianisation scheme in Greenwich</p> <p>Town Centre, and request RB Greenwich provides further details of this</p> <p>scheme to appropriate TfL Business Units, to ensure the impacts of the</p> <p>proposal are fully understood. In respect of Crossrail, TfL wishes to note that</p> <p>the scheme is due to open in 2019.</p> <p>Thames River Crossings- Paragraphs 2.1.29-2.1.31</p> <p>TfL notes the aspiration of RB Greenwich to create a fixed crossing link at</p> <p>Gallions Reach. In response to this, such a proposal was put forward in the</p> <p>Mayors Transport Strategy, and TfL recently undertook consultation on this</p> <p>proposal alongside a package of other river crossing measures, which closed</p> <p>in February 2013. TfL is in the process of analysing responses received during</p> <p>the consultation period and will report in Spring 2013.</p> <p>In addition, TfL notes an extension of the River Thames passenger services is</p> <p>also proposed. As outlined previously, TfL’s River Action Plan, nor the East</p> <p>Sub Regional Transport Plan contains a commitment to support the extension</p> <p>of river services to Thamesmead or the construction of a pier in its locality.</p>				<a href="#">77</a>	

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						<p>Bus Priority Scheme- Paragraphs 2.1.35-2.1.36</p> <p>TfL supports the provision of bus priority measures to support the development</p> <p>of the bus network in RB Greenwich, however it should be noted that the</p> <p>London Plan, the Mayors Transport Strategy, nor the East Sub Regional</p> <p>Transport Plan propose specific schemes to enhance connectivity in the areas</p> <p>noted in paragraphs 2.1.35-2.1.36.</p> <p>Public Transport Link to Eltham- Paragraphs 2.1.38 -2.1.41</p> <p>TfL supports the aspirations of RB Greenwich to strengthen north-south links in</p> <p>the borough, however as outlined previously, the London Plan, the TfL</p> <p>Business Plan nor the East Sub Regional Transport Plan propose or support</p> <p>the extension of Docklands Light Rail (DLR) services to Eltham and Kidbrooke</p>					
Documents of the Evidence Base	Appendix 5	265434	Carmelle Bell	Not specified	Not specified	<p>The Infrastructure Delivery Plan included as a supporting document to the Core Strategy is currently out of date and needs to be updated to reflect the current position in relation to water and wastewater infrastructure including that the Thames Tideway Tunnel Development Consent application was accepted for examination by the Planning Inspectorate on the 27 March 2013.</p> <p>Under section 2.4.10 reference is made to Thames Water currently planning for their next AMP period (2010-2015). The current business plan for AMP5 covering this period was accepted in 2010. Thames Water are currently consulting on their draft business plan covering the period from April 2015 to March 2020 together with their draft Water Resources Management Plan covering the period from 2015-2040.</p>					<a href="#">86</a>
Documents of the Eviden	Appendix 5	147485		Not specified	Not specified	The National Planning Policy Framework (NPPF) requires each local planning authority to produce a Local Plan for its area. Local Plans should address the spatial implications of economic, social and environmental change. Local Plans					<a href="#">128</a>

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ce Base						<p>should be based on an adequate, up-to-date and relevant evidence base. In addition, paragraph 73 of the NPPF requires that:</p> <p>“Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area.”</p> <p>Although it is acknowledged that the Greenwich Open Space Study has been undertaken, this document does not constitute, in Sport England’s opinion, a robust assessment of need. As such, there is a risk that the policies contained in the Core Strategy may be found to be unsound as they are not fully justified.</p> <p>Sport England would be happy to provide further advice on how Greenwich Council can strategically plan for sports facilities. There are a number of tools and guidance documents available, which can be found on Sport England’s website at: <a href="http://www.sportengland.org/facilities__planning/developing_policies_for_sport.aspx">http://www.sportengland.org/facilities__planning/developing_policies_for_sport.aspx</a>. In addition, Sport England has a web based toolkit which aims to assist local authorities in delivering tailor-made approaches to strategic planning for sport. This can be found on Sport England’s website at: <a href="http://www.sportengland.org/facilities__planning/planning_tools_and_guidance.aspx">http://www.sportengland.org/facilities__planning/planning_tools_and_guidance.aspx</a>. The toolkit focuses on built facilities for sport and recreation, setting out how planners can make the best use of sport-specific planning tools in determining local facility needs.</p>					
	Policy CH(a) Loss of Community Facilities	147485		Not specified	Not specified	As indoor sports facilities are not specifically referenced within the other sections of this document relevant to Sport England, stated above, it is therefore important that indoor sports facilities are specifically referenced within this policy. This policy does not currently comply with Planning Policy 2 within Sport England’s Spatial Planning for Sport and Active Recreation: Development Control Guidance Note (2009) Appendix ( <a href="http://www.sportengland.org/facilities__planning/developing_policies_for_sport.aspx">http://www.sportengland.org/facilities__planning/developing_policies_for_sport.aspx</a> ) and paragraph 74 of the NPPF. Sport England therefore recommends that Policy CH(a) Loss of Community Facilities is revised in line with Sport England’s Planning Policy 2 and the NPPF					<a href="#">127</a>
	Policy CH(a) Loss of Communi	148409	Ms Rose	Not specified	Yes	No comment					<a href="#">262</a>

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	ty Facilities		Freeman								
	Policy CH(a) Loss of Community Facilities	502653	Linda Pound	Not specified	No	<p>The need for flexibility is appreciated, but the policy is too loosely worded. "Local" and "similar" may mean anything and be applied arbitrarily by anyone at any time.</p> <p>In addition, the policy statement suggesting community facilities should be located on the edge of a town or local centre poses particular problems for Charlton, which is not "a town" and where the historic centre (Charlton Village) is far from being the geographical centre</p>	<p>More specific definitions of "local" and "similar" need to be built in to the Development Plan.</p> <p>Clarity is needed about RB0's intentions for areas which are not on the edge of a town and/or where a "centre" has changed over time.</p>				<a href="#">298</a>
	Policy CH(a) Loss of Community Facilities	763263		Yes	No	It is unclear as to whether both parts (i) or (ii) and (iii) need to be met.	Existing facilities should only be safeguarded where replacement facilities are not proposed either on or off site of the same quality to serve the needs of the area. This no net loss approach would allow for the delivery of approved strategies to be met. By having to meet the aims of (i) and (iii) surplus facilities cannot be released and funds reinvested, effectively double counting the community facilities provision. An 'or' should be placed after (ii) to clarify this.	188443	Mr Brian Coughlan	CGMS Consulting	<a href="#">517</a>
	Policy CH1 Cohesive Communities	147775	Mr Brian Regan	Yes	Yes	• Paragraph 4.7.15 predicts further future requirements will be needed to ensure sufficient school places and early years and childcare provision in the future. Should Policy CH1 also acknowledge that new residential development will need to be phased alongside a planned programme of school and childcare enhancements?					<a href="#">112</a>
	Policy CH1 Cohesive Communities	147485		Not specified	Not specified	Sport England welcomes points i and vii within this policy.					<a href="#">126</a>
	Policy CH1 Cohesive Communities	148409	Ms Rose Freeman	Not specified	Yes	The list of facilities to describe the term 'community facilities' in para.4.7.11 includes arts and cultural (not culture) facilities which links to UDP Policy TC20. A more succinct description for the term 'community facilities' could be - The function of community facilities is to provide services and access to venues for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.					<a href="#">261</a>
	Policy CH1 Cohesive Communities	501408	Mr John Franklin	Not specified	No	Para 4.7.4 says that "in order to successfully implement this policy and achieve improved community cohesiveness... the Council will work with the Greenwich Partnership and other partners...." But the Greenwich Partnership is too wide-ranging to consider the impact of infrastructure and development schemes on neighbourhoods within the Borough. The Statement of Community Involvement sets	Either here or in Section 3, there should be an undertaking that the Council will reactivate or establish management agencies where appropriate, notably in the Town Centre and the Peninsula, and support them as the forum for consulting communities on strategic issues affecting their neighbourhood.				<a href="#">145</a>

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						out the Council’s procedures for consultation, and these are generally satisfactory for individual planning applications. But there is no procedure for systematic consultation with local communities on more general longer-term topics of importance to them, such as the cumulative impact of successive developments on infrastructure needs. In the past there have been Management Agencies for Greenwich Town Centre, East Greenwich and the Peninsula, but these have lapsed. They need to be revived, properly resourced and supported by the Council, to consider longer-term issues as reflected in the Infrastructure Development Plan.					
	Policy CH1 Cohesive Communities	759983	Ms Rinaani Musutua	Not specified	Not specified	Policy CH1 gives no clear delivery plan on how community cohesiveness and safety will be achieved. It also lacks specifics on what community facilities are needed in each location. The absence of community facilities health checks on each location means there is no evidence of how far the existing facilities meet the requirements of sustainable communities and lifetime neighbourhoods. It needs to give strategic direction relating to community involvement. There is a lack of facilities to encourage family participation and community cohesion. Thamesmead lacks sufficient GPs and dentists and residents travel far to access healthcare and none of these are within walking distance to most families. There are four dentists in the area which are already oversubscribed. It takes more than a month to get a school place in Thamesmead and curriculum education should be provided for children out of school while waiting for a school place. It does not mention the importance of improving links/path between Central and West Thamesmead in order to encourage healthy travel options e.g. walking or cycling, thereby contributing to healthy and cohesive communities. There is no specific mention on how road safety in Thamesmead will be addressed. Most roads in Central and North Thamesmead are A-roads, on which 40mph is allowed and run very near schools posing a danger to children. Neither does it have enough healthy food provision in terms of local farm markets or vans selling healthy food around the neighbourhood	The policy should support sustainability and enhancement of community cohesion and safety including support for community facilities improvements that will strengthen cohesive and safer communities. There should be a requirement to improve the quality of the public realm and conditions for pedestrians and cyclists. Speed limit should be reduced and sufficient traffic surveillance to ensure road safety is needed. A Community Development Strategy is mentioned in the supporting text of the policy but would be strengthened and given strategic importance through being added to the policy. To ensure the policy is fully justified and effective, the strategy for community involvement in the plans should be drawn up. Residents are not aware of what facilities for healthy living, and mapping on those facilities should be provided more widely. Most residents do not know how to get to the Thames Pathway.				<a href="#">282</a>
	Policy CH1 Cohesive Communities	745440	Ms Sharon Hayward	Not specified	No	<p>The policy is unsound because: it is not effective. It fails to promote the involvement of existing communities (as well as new) in developments or indeed in generally shaping neighbourhoods. It fails to mention or to provide a framework for delivering Lifetime Neighbourhoods.</p> <p>The policy mentions a Community Development Strategy – but this seems to be focused only on encouraging successful integration of tenures only in new developments.</p> <p>New developments are not / should not be island – but relate to and impact on existing communities. In some</p>	<p>To ensure this policy is sound, it should acknowledge the need for existing communities to be involved in very early stages of plans for new developments and generally in shaping neighbourhoods (as well as involving new communities). Existing communities should be</p> <ul style="list-style-type: none"> <li>involved in assessing the impact – positive or negative, of new developments</li> <li>involved in influencing proposals using their long term knowledge and understanding of their area,</li> </ul>				<a href="#">338</a>

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						situations residents are displaced by new developments. It is important to consider the links between new and existing communities.	<ul style="list-style-type: none"> <li>empowered to consider new local planning powers as set out in the Localism Act 2011</li> <li>be empowered to make informed decisions about any proposals that involve demolition of homes and development of new homes v refurbishment</li> </ul> <p>Policy 7.1 of the London Plan should be mentioned in this policy and a summary of a Lifetime Neighbourhood definition be provided.</p>				
	Policy CH1 Cohesive Communities	757394	Miss Susie Wilson	Not specified	No	Policy CHI fails to give strategic direction relating to community involvement in development plans in RBG and supporting text fails to mention involvement of communities at all stages of development of plans.	A Community Development Strategy is mentioned in the supporting text of policy CH1, but would be strengthened and given strategic importance through being added to the policy. It is important that communities are involved at all stages of plans for all developments ( not just post development). In some cases this will be communities whose estate is to be demolished; sometimes it will be the communities that surround a development site. This should be highlighted in the policy and supporting text.				<a href="#">459</a>
	Policy CH1 Cohesive Communities	762451	Laura Williams	Yes	No	<p>The NPPF explicitly recognises the importance of cultural and educational facilities to the well being of communities and their role in delivering sustainable development.</p> <p>The Aluna project will ensure that many of the Borough’s objectives in delivering cohesive communities are met, being representative of the maritime and scientific history of the Borough and celebrating London’s diverse cultural heritage.</p> <p>In particular:</p> <ul style="list-style-type: none"> <li>♣ Aluna is a landmark that uniquely brings together art, culture, science and the environment and has a strong educational outreach.</li> <li>♣ Aluna is a legacy project that articulates a wealth of knowledge, providing a public waterfront ‘amphitheatre’ for festival, dance, theatre and music, ambiently illuminated by the moon’s renewable tidal energy.</li> <li>♣ Plans are in development for a diverse, participatory outreach programme that will explore, educate and celebrate the interconnected relationships between human kind and the natural world, including a national curriculum learning programme and cultural archive that will be piloted in local schools and community centres.</li> </ul>	<p>4.7.10 Community facilities play an important role in developing stronger and more cohesive communities. They can provide a focal point for a community and can help to encourage a sense of belonging. It is important to ensure that the provision of community facilities continues to reflect the needs of a changing and increasingly diverse population, and that these facilities are accessible to all. The Borough will encourage and support public art and cultural facilities that address inclusivity and community cohesion, such as the Aluna landmark proposed for the North Greenwich area. ...</p> <p>4.7.11 Community facilities are those facilities used by the local community. These can include:</p> <ul style="list-style-type: none"> <li>♣ Buildings used by voluntary sector groups;</li> <li>♣ Social service and day centres;</li> <li>♣ Places of public worship or religious instruction;</li> <li>♣ Medical or health services, and healthy living centres (except for the use of premises</li> <li>♣ attached to the residence of the consultant or practitioner);</li> </ul>				<a href="#">479</a>

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						<p>♣ Aluna will be an ideal Learning Outside the Classroom venue, the national programme to encourage young people to experience the world beyond the classroom as an essential part of learning and personal development.</p> <p>One of the 12 core principles of the National Planning Policy Framework (NPPF) states that plan-makers should:</p> <p>“take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.”</p> <p>The Mayor’s spatial development strategy, “The London Plan” (LP), further supports cultural development in public spaces, particularly that which echoes an area’s heritage:</p> <p>“Opportunities for the integration of high quality public art should be considered... Treatment of the public realm should be informed by the heritage values of the place, where appropriate.” (215)</p> <p>“London should be: [...] A city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London’s built heritage, and which makes the most of and extends its wealth of open and green spaces, natural environment and waterways, realising their potential for improving Londoners’ health, welfare and development” (210)</p> <p>“Based on an understanding of the character of a place, new development should help residents and visitors understand where a place has come from, where it is now and where it is going.” (214)</p> <p>The Mayor of London’s cultural strategy, “Cultural Metropolis”, also emphasises support for public art and culture, and in particular that which enhances London’s cultural heritage, with specific reference to Aluna:</p> <p>Aluna is mentioned in the Mayor's Cultural Metropolis, Nov 2008, p.14, Key Priorities:</p> <p>"As well as major capital developments, we will keep on supporting important and innovative works of public art such as the groundbreaking Aluna lunar clock project proposed for South East London..."</p> <p>Aluna is also mentioned in the Mayor's Cultural Strategy, Nov 2010, p.61, Capital projects: maintaining ambition in a</p>	<p>♣ Fire safety, policing and other criminal justice and community safety facilities;</p> <p>♣ Facilities for youth provision;</p> <p>♣ Sport, leisure and recreational facilities;</p> <p>♣ Arts and culture facilities;</p> <p>♣ Crèches, day nurseries or other childcare facilities;</p> <p>♣ Schools, education and training centres;</p> <p>♣ Informal education facilities (including areas of learning outside the classroom); and</p> <p>♣ Ancillary community uses.</p>				

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						<p>challenging climate:</p> <p>"There are also a number of exciting projects currently under construction which have received substantial public and private sector support, such as the extension of Tate Modern, scheduled to open in 2012, the new Photographers Gallery, which should be fully opened in 2011 or those still yet in development, such as the Aluna clock project which will provide the world's first large-scale lunar clock."</p>					
	Policy CH2 Healthy Communities	630863	Transport for London	Not specified	Not specified	<p>TfL supports policies which seek to create healthier communities, particularly</p> <p>the commitment to ensuring health facilities in the borough are accessible to all</p> <p>by walking, cycling and public transport. To achieve this, TfL request that the</p> <p>RB Greenwich policies ensure that new health facilities provide cycle parking in</p> <p>line with London Plan standards, and ensure good connectivity to key walking</p> <p>routes and local public transport services.</p>					<a href="#">69</a>
	Policy CH2 Healthy Communities	148036	Ms Jenny Bates	Not specified	No	<p>We object to Policy CH2 Healthy Communities</p> <p>To be sound this and supporting text needs to reflect the need to cut air pollution and meet EU legal limits (see section above)</p>					<a href="#">430</a>
	Policy CH2 Healthy Communities	166965	Berkeley Homes	Not specified	Not specified	<p>We object to part II of this policy which requires a Health Impact Assessment (HIA) to be undertaken for major developments. We consider that a HIA should be undertaken at strategic level by the Council and not a development by development basis. We consider that the proposals for an HIA to be submitted with major planning applications are contrary to the Government's objectives of speeding up the planning system and should therefore be deleted from Policy CH2.</p>		188419	Mr Bob McCurry	Senior Planner Barton Willmore	<a href="#">406</a>
	Policy CH2 Healthy Communities	537756	Mr Richard Lee	Not specified	No	<p>In section 4.7 on Cohesive and Healthy Communities, policy CH2 Healthy Communities and supporting text needs to reflect the need to cut air pollution and meet EU legal limits</p>					<a href="#">249</a>
	Policy CH2 Healthy Communities	537756	Mr Richard	Not specified	No	<p>The policy is unsound because</p> <ul style="list-style-type: none"> <li>It fails to include the new public health framework</li> </ul>					<a href="#">255</a>

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	ties		Lee			<ul style="list-style-type: none"> <li>• Does not follow NPPF 171</li> <li>• Does not identify spatially the areas of under provision of healthcare and respond to these</li> <li>• Does not provide a clear vision for reducing health inequalities</li> <li>• Does not identify areas where there is deficiency for example, where healthy food is not affordable or easily accessible</li> <li>• Does not set out how the JSNA has informed the Core Strategy</li> <li>• Does not respond to the findings of the Infrastructure Delivery Plan and particularly the HUDU modeling on the need arising from population growth</li> </ul>					
	Policy CH2 Healthy Communities	759983	Ms Rinaani Musutua	Not specified	Not specified	Policy CH2 is unclear and outdated. The policy does not mention how the air and noise pollution caused by City Airport will be tackled in order to improve health for the Thamesmead residence. The impact on the closure of large hospitals and health facilities is not mentioned in the policy. The original plan for a hospital in Thamesmead was dropped but no alternative provision is mentioned. The policy does not map areas that are in need of improved health. It is inadequate in providing the most appropriate strategy informed by up-to-date evidence based on health inequalities. The supporting text does not mention how the unfair health inequalities and differences in health status seen within the borough will be avoided. There are not sufficient sports activities for children under seven years. Parents have to travel to Plumstead to enrol their 4 year old children in football clubs.	It is essential that it provides the most appropriate strategy relating to improving the residence health, based on up-to-date evidence. The HUDU model which ensures the development of healthy and sustainable communities and enabling a full appreciation of health service requirements should be added to the policy in order to strengthened and give it strategic importance. The policy needs to reflect the need to cut air pollution and meet EU legal limits.				<a href="#">283</a>
	Policy CH2 Healthy Communities	166972	Cathedral Group	Yes	No	<p>Cathedral Group considers that the need to prepare HIA's for all major developments (i.e. over 10 dwellings and 1000sqm of floorspace) is onerous and unnecessary. There is no justification for this threshold within the Core Strategy.</p> <p>Where very large developments are proposed, it may be appropriate to consider the intentions of a HIA but recognise that much of the information will be provided elsewhere in the application documents. If RBG would like this information brought together, we suggest that this could be done as a summary within the Design and Access Statement that refers to the other application material as necessary.</p>	<p>The threshold for the requirement for a HIA should be increased so that the Council is not reasonably requiring the submission of additional or repeat information for smaller schemes.</p> <p>For very large developments, the Core Strategy should state that where a HIA is required, this can be addressed within the Design and Access Statement and refer to other submission documents as appropriate.</p>	188810		Nathaniel Lichfield and Partners	<a href="#">493</a>
	Policy	760607	Alan	Not	Not specified	Section 4.7 on Cohesive and Healthy Communities, policy					<a href="#">367</a>

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	CH2 Healthy Communities		Haughton	specified		CH2 Healthy Communities and supporting text needs to reflect the need to cut air pollution and meet EU legal limits.					
	Policy DH(a) Residential Extensions	147698	Laurie Baker	Not specified	Not specified	We welcome the Management policies DH (a) to (n). A separate policy on Local listed buildings (DH (j)) is very welcome and the Society is and will be actively involved in suggesting further buildings.					<a href="#">155</a>
	Policy DH(a) Residential Extensions	148486	Ms Wendy Shelton	Not specified	Not specified	<p>Policy DH(a) Residential Extensions - refer back to comment on Policy H(b).</p> <p>Policy H(b) Conversions - support paragraph 4.1.42 refers to a new Supplementary Planning Document detailing design standards for conversions which will supersede the Council's current Advice Note 3 "Planning Standards for Conversions". It is essential that the new document be prepared in draft form to allow for public consultation in the same manner in which the emerging Design Guidance for Residential Extensions SPD - referred to in support paragraph 4.4.38 to Policy DH(a) Residential Extensions and in the support paragraph 4.4.41 to Policy DH(b) Protection of Amenity for Adjacent Occupiers - is anticipated to be published in draft form in 2013.</p>					<a href="#">220</a>
	Policy DH(b) Protection of Amenity for Adjacent Occupiers	148486	Ms Wendy Shelton	Not specified	Not specified	Policy DH(b) Protection of Amenity for Adjoining Occupiers - refer back to comment on Policy H(b). Also continue to maintain that, in either the policy itself or in one of the support paragraphs, it would be helpful to introduce a cross reference to Policy H(c) in the same way that at Policy H(c)ii, relating to Backland and Infill Development, there is a cross reference back to Policy DH(b).					<a href="#">221</a>
	Policy DH(b) Protection of Amenity for Adjacent Occupiers	502653	Linda Pound	Not specified	No	Although some debate ensued from the Draft Core Strategy and some amendment has taken place, there is still the potential for a great deal of misinterpretation of the words "adjoining" and "adjacent". Dictionary definitions show the words are frequently used inter-changeably, and have little difference in meaning: both terms may mean "side by side" or "nearby". Any development has power to impact adversely on a wide area and the needs of those living opposite and to the rear of sites must be taken into account	<p>Clarify exactly how "adjoining" and "adjacent" are different in the terminology of this document.</p> <p>Include the words "opposite" and "to the rear of" to ensure that properties/residents in these cases have proper protection from adverse impact of development.</p>				<a href="#">301</a>
	Policy DH(b) Protection of Amenity for	502194	Waite	Yes	No	The terminology is unclear and there is danger that flexibility may lead to arbitrary definition which is not to the benefit of residents 'adjoining' and 'adjacent' are often used interchangeably and still have the potential for confusion and misinterpretation.	There should be clarity on what 'adjoining' and 'adjacent' really mean plus inclusion of 'nearby' (and definition), 'opposite' and 'at the rear of' to ensure that residents have proper protection of amenity.				<a href="#">437</a>

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	Adjacent Occupiers					There is also no recognition of the fact that a development will impact on people living a few doors away from, opposite to and behind a site.					
	Policy DH(d) Satellite Antennae	148486	Ms Wendy Shelton	Not specified	Not specified	Policy DH(d) Satellite Antennae - while welcoming the fact that the Core Strategy highlights the adverse visual impact that satellite installations can have on individual buildings and on the townscape generally, we continue to regret that in neither the Design and Heritage section nor the Environment and Climate Change section of the Core Strategy document is there any reference to 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 the equipment is installed in much the same way as satellite antennae. Such installations could be even more damaging where different types of equipment are installed in close proximity to the detriment of the setting and appearance of conservation areas.					<a href="#">222</a>
	Policy DH(f) Advertisements	147465	Graham Saunders	Not specified	Not specified	In general we support the policy subject to point i) being expanded to include the need for advertisements not adversely affecting the OUV and setting of the MGWHS.					<a href="#">198</a>
	Policy DH(g) Local Views	148464	Mr Lawrence Smith	Yes	No	As currently worded, the policy gives unqualified permission for developments which do not impede on the listed views, without restricting those that do impede.	Insert "only" after "Planning permission will".				<a href="#">37</a>
	Policy DH(g) Local Views	634722	Crossrail	Not specified	Not specified	The protection of local views by DH(g) is noted. To provide greater guidance on the protection offered, we recommend that the drafting is amended to read, ‘planning applications for buildings that will appear within these views should be assessed on a site by site basis, and where no harm is demonstrated, as arising through the undertaking of a townscape assessment, permission should be granted.’		634723	Stephen Harrington	GVA Grimley	<a href="#">97</a>
	Policy DH(g) Local Views	147465	Graham Saunders	Not specified	Not specified	It is not clear whether management plans have been developed to help ensure the importances of these local views are sustained. We would, in line with the approach taken by the London Mayor’s Local View Management Framework					<a href="#">199</a>

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						<p>SPG, suggest that some evidence is provided that helps articulate the values and subsequent management of these important Royal Borough views.</p> <p>Para 4.4.55</p> <p>We would suggest that this paragraph concerning views identified in conservation area appraisals and management plans be highlighted as key contributors to the significance of conservation areas as designated heritage assets. As a result we would suggest that the text highlights the need for developments to consider their details, for the purpose of ensuring the significance of the asset is inappropriately harmed.</p>					
	Policy DH(g) Local Views	166972	Cathedral Group	Yes	No	The protection of local views by DH(g) is noted. To provide greater guidance on the protection offered, we recommend that the drafting is amended to read, ‘planning applications for buildings that will appear within these views should be assessed on a site by site basis, and where no harm is demonstrated, as arising through the undertaking of a townscape assessment, permission should be granted.’	see above.	228178	Ms Diana Thomson	GVA Grimley	<a href="#">470</a>
	Policy DH(h) Conservation Areas	147465	Graham Saunders	Not specified	Not specified	<p>The policy could be expanded to encourage developments that help reveal the significance of conservation area. In addition it would be useful for the policy to be more explicit in what needs to be considered for further conservation. This includes the need to safeguarding spaces, street patterns, views, vistas, uses and trees which contribute to the special character or appearance of that conservation area. The supporting text refers to the development of appraisals. We would suggest that these appraisals should then be used to inform and guide development in these areas, including their settings. Finally where up-to-date</p>					<a href="#">200</a>

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						Conservation Area Appraisals are not available we would encourage the Council to  require developers to submit character statements that demonstrate the impact of the  development upon their character and appearance of the conservation area.					
	Policy DH(h) Conservation Areas	148486	Ms Wendy Shelton	Not specified	Not specified	Policy DH(h) Conservation Areas - we continue to question why, at this section of the document, a map showing all of the Borough’s conservation areas and their inter-relationships has not been included to supplement the several individual conservation area maps in the separate Proposal Map Changes document.					<a href="#">223</a>
	Policy DH(i) Statutory Listed Buildings	147465	Graham Saunders	Not specified	Not specified	In general we welcome the policy subject to the following issues being addressed. Point iv)  should be amended so that the significance of the listed building as expressed in its setting is  not harmed by inappropriate developments. In addition the test for demolition should be  considered in the context of the NPPF and the tests it details. This includes the need for  clear and convincing justification to support any proposal that may cause harm or loss of a  heritage asset (NPPF –para 132), and the interpretation of substantial harm in relation to the  grade of asset being considered. Finally the policy should address the need for measures to  be promoted that ensure neglected listed buildings are appropriately repaired and re-used.  Policy Omission  There appears to be no policy related to the protection and enhancement of registered  historic parks and gardens. We would suggest that a policy should be included for  development management purposes that safeguard features which form an integral part of  the special character or appearance of the Park or Garden.				<a href="#">201</a>	

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						In addition ensure that  developments do not detract from the enjoyment, layout, design, character, appearance or  setting of the Park or Garden, key views out from the Park, or prejudice its future restoration;					
	Policy DH(i) Statutory Listed Buildings	148486	Ms Wendy Shelton	Not specified	Not specified	Policy DH(i) Statutory Listed Buildings - we are pleased to note that, since the draft report stage, this important topic has been given a policy reference on the lines of Policies D18, D19 and D20 of the current UDP.					<a href="#">224</a>
	Policy DH(j) Locally Listed Buildings	148464	Mr Lawrence Smith	Yes	No	The policy is not fully effective because the protection given to locally listed buildings is not strong  enough.	Insert "strongly" before "discouraged" in the final sentence.				<a href="#">38</a>
	Policy DH(k) Thames Policy Area	148496	Mr Frank King	No	No	The building of residential properties on the Riverfront conflicts with Policy DH (k) and with many other Policies regarding the protection of the River and the Archaeological Sites along the River.  DH (k) iv. in particular sets out to protect the Riverfront from any "encroachment other than for River dependent uses".  DH (k) v. Seeks to minimise the Flood Risks along the Thames. If all of the residential properties which have been planned are built along the Thames the risk of flooding during high tides is unacceptably high. High Rise and all other residential properties will, almost certainly, experience "blowback" with the extra plumbing required by these properties, causing many of these properties to require evacuation and substantial repairs and refurbishment each time that this happens. The sewerage system is not adequate at this time, yet another infrastructure problem which must. be in place before these properties are built.  I do not believe that this risk has been taken seriously.  DH (k) iii. I trust that this means that, if houses and tower blocks are built on the Riverfront, they will have to conform to the nature of their surroundings, not garish colours and designs as are those next to the Dockyard and those in the Old Royal Arsenal sites. These are terrible eyesores and do not match the expected sights in, or adjacent to, World Heritage Sites.  DH (k) ii. Also calls for modes of Passenger, Freight and	Ensure that ALL INFRASTRUCTURE, including Roads, Sewers and Transport is in place BEFORE any residential properties are built.  Ensure that all building sites are inspected and certified as cleared of all Archaeological remains by English Heritage,  Ensure that any building above twenty foot in height is designed to fit-in with the character of the Royal Borough of Greenwich.  Ensure that the Mayor of London's target of 40% of any residential properties are affordable to the average resident of Greenwich, that is to say rent able at no more than 80% of the NATIONAL RENTABLE COST, and not London Rents.			<a href="#">455</a>	

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						Tourist Transport. Residential properties close to the Riverbank would not only prevent this, but would also cause the Riverbank to become impassable.					
	Policy DH(k) Thames Policy Area	166972	Cathedral Group	Yes	Yes	Cathedral Group support the enhancement of the river and the creation of a continuous public riverside footpath/cycleway. This will help to create an active frontage and maximise the opportunities and benefits that the river can bring to the Borough.		188810		Nathaniel Lichfield and Partners	<a href="#">508</a>
	Policy DH(k) Thames Policy Area	166972	Cathedral Group	Yes	No	The promotion of high quality design that respects the special character of the Thames is supported, as is the incorporation of sustainable modes of passenger and tourist transport. However, the increased use of freight transport should respect the introduction of residential uses in Charlton Riverside and should not harm the amenity of residential uses.	Links with the river are also supported although the provision of footpaths and cycleways with development proposals should have regard to feasibility and viability of provision	228178	Ms Diana Thomson	GVA Grimley	<a href="#">471</a>
	Policy DH(k) Thames Policy Area	167229	Ms Lucy Owen	Yes	No	<p>This policy is in principle welcomed however further clarification is required.</p> <p>The policy seeks for proposals to contribute to the completion of a continuous public riverside path and cycleway. The words 'where appropriate' should be included as it may not always be possible for a development to incorporate the riverside path. For example, it may not be appropriate for a development on a safeguarded wharf to include the Thames Path along the front of the site where cargo is being handled.</p> <p>The policy seeks to incorporate sustainable modes of passenger, freight and tourist transport as appropriate but it does not define what the plan classes as 'sustainable modes.' Does this include river transport?</p> <p>The policy seeks to avoid encroachment other than for river dependent uses and this is welcomed however it is considered that the policy could go further and support and protect existing river related uses. The support and protection of river dependent uses would accord with London Plan policy which seeks to prioritise the uses of the waterspace and land alongside it safely for water related purposes, in particular for passenger and freight transport. For example, policy 7.25 seeks to protect existing facilities for waterborne passenger and tourist traffic and supports development proposals which provide new facilities; policy 7.226 protects existing facilities for waterborne freight traffic and supports development proposals which increase the use of safeguarded wharves for waterborne freight transport and policy 7.27 protects waterway support infrastructure and seeks new infrastructure to support water depended uses.</p>	<p>Add the words 'where appropriate' to the end of point i)</p> <p>Define 'sustainable modes'</p> <p>Add text to point iv) supporting and protecting existing river related uses</p> <p>Define 'water-foreshore recreation' and give further consideration to its appropriateness</p>			<a href="#">342</a>	

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						Paragraph 4.469 refers to a 'river dependent use' such as for water-borne transport or to enable water-foreshore and water-based recreation. What is water-foreshore recreation? There are health and safety and environmental issues that can occur with access to the foreshore. Care should therefore be taken when referring to activities on the foreshore.					
	Policy DH(k) Thames Policy Area	762451	Laura Williams	Yes	No	<p>GCS Policy Thames Policy Area DH(k) recognises that “Waterfront locations should be viewed as opportunity sites for landmark buildings and design innovation, and this should be reflected in the choice of quality materials”. However, we believe that this could be enhanced through the additional wording suggested.</p> <p>In line with GCS Policy DH(k), Aluna will:</p> <ul style="list-style-type: none"><li>♣ Present an opportunity for another international landmark along the River Thames;</li><li>♣ Be of high quality of design respecting the special character of the River Thames within the Thames Policy Area;</li><li>♣ Develop and enhance the area’s links with the river, and contribute to the completion of a continuous public riverside footpath and cycleway;</li><li>♣ Incorporate sustainable modes of passenger [...] and tourist transport;</li><li>♣ Consider strategic and local views DH(g);</li><li>♣ Protect and enhance the river and its foreshore for wildlife and nature conservation</li></ul> <p>Aluna is also proposed to sit adjacent to a public draw dock, one of the last ones remaining in London. The maritime and public realm nature of the Aluna proposal will assist in protecting and enhancing vital waterfront public realm space and infrastructure. However, there is insufficient reference in the draft Greenwich Core Strategy to support the protection and the designated public use of river structures and access points such as the public draw dock at Greenwich Peninsula.</p> <p>In the latest "London Plan", Policy 7.29 addresses the River Thames, stating that:</p> <p>“The central London stretches of the Thames are world</p>	<p>Policy DH(k) Thames Policy Area</p> <p>The Council will seek a high quality of design respecting the special character of the River Thames within the Thames Policy Area defined on the Proposals Map. Proposals within the Area will be expected to:</p> <p>i. Develop and enhance the area’s physical and cultural links with the river, and contribute to the completion of a continuous public riverside footpath and cycleway (see Policy DH1 and IM4);</p> <p>ii. Incorporate sustainable modes of passenger, freight and tourist transport as appropriate;</p> <p>iii. Consider strategic and local views DH(g);</p> <p>iv. Protect and enhance the river and its foreshore for wildlife and nature conservation, avoid encroachment other than for river dependent and river enhancing uses and contribute positively to the improvement of the local environment; and</p> <p>v. Protect the integrity of existing flood defences to minimise flood risk (also see Policy E2 and E3).</p> <p>The Aluna moon clock is an example of one project which is considered to meet these objectives.</p>			<a href="#">485</a>	

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						<p>famous locations, featuring well known landmarks and views. Many other stretches have important historic, cultural and natural connections. These aspects of the Thames should be protected” (para 7.88).</p> <p>The London Plan also recommends that local boroughs carry out an appraisal and formulate a strategy, which, among other things, should consider areas, sites, buildings, structures and landscapes and views of particular sensitivity and importance.</p> <p>The Thames Strategy East (TSE) provides “Reach Guidance”. RG 3.8 recommends the protection and enhancement of “river infrastructure including the Woolwich Ferry and its terminals, the Woolwich Foot Tunnel Barrier Gardens, Queen Elizabeth II Pier and the steps and slipways within the Reach”. The draw dock on the Greenwich Peninsula would certainly fall under the bracket of “river infrastructure” and a draw dock and a slipway are effectively the same thing. On this basis, the placement of Aluna adjacent to the public draw dock would be consistent with, and enhance, the protection of this important river infrastructure.</p> <p>London Plan Policy 7.27: Blue Ribbon Network: Supporting Infrastructure and Recreational Use, states that:</p> <p>“Development proposals should enhance the use of the Blue Ribbon Network, in particular proposals:</p> <p>a. that result in the loss of existing facilities for waterborne sport and leisure should be refused, unless suitable replacement facilities are provided</p> <p>b. should protect and improve existing access points to (including from land into water such as slipways and steps) or alongside the Blue Ribbon Network (including paths). New access infrastructure into and alongside the Blue Ribbon Network will be sought.”</p>					
	Policy DH(k) Thames Policy Area	762451	Laura Williams	Yes	No	<p>The policy framework places emphasis not just on the importance of cultural development, but also its promotion and delivery. Support through planning obligations is one of the keys ways to achieve this.</p> <p>It is accordingly important that the Core Strategy should specifically indicate that in appropriate circumstances, developers should be encouraged to financially support artistic public realm projects to improve overall planning outcomes, particularly in regeneration areas such as the Greenwich Peninsula. This is supported by wider planning</p>	<p>Policy IM1 Infrastructure</p> <p>The Council will ensure, through the use of conditions and planning obligations attached to planning permissions, that all qualifying development provides for the infrastructure, facilities, amenities, cultural and artistic installations 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</p>				<a href="#">486</a>

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						<p>policy.</p> <p>Whilst we believe that the existing wording of Policy IM1 supports this in a general way, the policy would be more sound if this were stated explicitly as suggested. As noted above, one of the 12 core principles of the NPPF states that plan-makers should:</p> <p>“take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.”</p> <p>Further, as noted above the London Plan provides at Policy 4.6C (d), that local borough should, in plan-making, :</p> <p>“promote and develop existing and new cultural and visitor attractions especially in outer London and where they can contribute to regeneration and town centre renewal “.</p>	<p>planned, well designed, accessible and integrated environment. The Council will seek appropriate planning obligations in accordance with its Planning Obligations SPD.</p> <p>Developments incorporating a significant amount of infrastructure, public realm and open space should reach a Civil Engineering Environmental Quality Assessment rating of 'Excellent'.</p>				
	Policy DH(l) Areas of Special Character	147698	Laurie Baker	Not specified	Not specified	The Society cannot understand why 4.4.70 supporting DH(l) does not include reference now to the ‘Shooters Hill/Abbey Ridge/Bostall Woods’ as this is an area of special character of major importance.	Reference to this should be reinstated.				<a href="#">156</a>
	Policy DH(n) Floating Vessels	167229	Ms Lucy Owen	Yes	Not specified	<p>Policy DH(n) relates to proposals to moor temporary or permanent floating vessels and the use of any additional areas to service or support activities on a moored vessel. It states that proposals must be</p> <p>_ Sympathetically relate to historic waterfront and riverside areas;</p> <p>_ Positively contribute to the river's life and scene;</p> <p>Not compromise existing or potential river transportation or wharfage operations; and</p> <p>_ Not unduly impact on the river and its foreshore through ecological disruption, pollution and noise</p> <p>It is questioned on what basis these criteria were established and it considered that as currently written the policy does not comply with the London Plan. For example additional areas to service or support activities on a moored vessel may relate to waterway support infrastructure such as boatyards and their associated moorings. Such facilities are protected and more facilities are sought through the London Plan due to a shortage of boatyard facilities.</p> <p>There is no reference to any facility not having a</p>	<p>Include a reference in the policy at bullet point 4 to: 'not unduly impact on the river and its foreshore, including through navigation, hydrodynamics, ecological disruption, pollution and noise'</p> <p>Include a reference in para 4.4.75 and the policy to 'not compromise existing or potential river transportation, waterway support infrastructure or wharfage operations' and ' the main use of the river Thames... is for passenger and freight transport, including wharfage operations and waterway support infrastructure'</p>			<a href="#">343</a>	

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						detrimental impact on navigation or hydrodynamics.  Paragraph 4.4.75 recognises that the main use of the River Thames in the Borough is for passenger and freight transport, including wharfage operations providing important employment generating activities. No reference is made to the existing waterway support facilities in the Borough.					
	Policy DH1 Design	147465	Graham Saunders	Not specified	Not specified	The policy provides a basic checklist of issues to consider when assessing the merits of a  proposal. This includes taking into account of the architectural, historical and archaeological  features and their settings. This is welcomed. The policy could be strengthened through the  supporting text. Principally we would first seek to ensure that all proposals submitted are  supported by clear and appropriate information that details the design rationale of the  proposed development. For example the NPPF (para 192) states the right information is  crucial to good decision-taking. In the case of proposals in sensitive locations NPPF (para  128) further highlights the need for local planning authorities to require and applicant to  describe the significance of heritage assets affected, including any contribution made by their  setting.  Second, the supporting text could emphasis the need for proposals to integrate into the built  and historic environment. This includes recognising the heritage interest of the site and  surroundings, and where heritage assets are identified, their significance. At present the text  is limited on its understanding of these issues (e.g. para 4.4.5 and 4.4.8)				<a href="#">194</a>	
	Policy DH1	148127	WM Morrison	Not specified	Not specified	Emerging Policy DH1 Design requires non-residential buildings in major developments to achieve BREEAM		267475		Peacock and Smith	<a href="#">414</a>

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	Design		Supermarkets Plc			<p>rating of Excellent. Our client accepts that BREEAM ratings are an appropriate measure of a buildings performance in terms of sustainability. However, they are concerned that setting stringent requirements for all major commercial developments to achieve BREEAM ‘Excellent’ could represent an unreasonable burden on companies. This, in turn, could jeopardise investment, regeneration and employment creation in the borough. This is particularly relevant in light of the current economic climate and the government’s current emphasis on promoting economic growth (as set out in the NPPF). A flexible and pragmatic approach needs to be adopted to ensure that it is justified and consistent with national policy.</p> <p>In light of this we would suggest that the Policy includes some flexibility, i.e. that the BREEAM requirements will be subject to the tests of suitability and viability, to ensure that it is sound.</p>				Limited	
	Policy DH1 Design	148451	Tilfen	No	No	<p>We note the various changes to Policy DH1 which sets out various criteria and targets for new development. Tilfen Land continues to support 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" having regard to issues of viability and practicability. For example:</p> <p>1) The amended target for a BREEAM Rating of "Excellent" (down from "Outstanding") for non-residential buildings (xvi) will be unviable in the majority of cases in Thamesmead Strategic Development Location having regard to the particular physical and commercial characteristics and other costs of development.</p> <p>2) We note that the requirement to incorporate brown or green roofs, or living walls has been replaced by an expectation that all developments incorporate living roofs and/ or walls in line with Policy E(f). The potential to incorporate such in industrial and distribution buildings raises significant structural and viability issues which will render such development undeliverable.</p>		382433	Mr Craig Blatchford	Blue Sky Planning	<a href="#">297</a>
	Policy DH1 Design	148486	Ms Wendy Shelton	Not specified	Not specified	<p>Policy DH1 Design - in support paragraph 4.4.11 there is a reference to the environmental benefits of retaining trees, with a cross reference to Policy OS(g) Green and River Corridors.</p> <p>We believe it would be more appropriate to cross refer to</p>					<a href="#">219</a>

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						<p>Policy OS(f) Ecological Factors, where, at paragraph 4.5.35, there is a reference to the Borough’s trees.</p> <p>Given that support paragraph 4.4.11 also highlights the aesthetic value of trees and the positive contribution they give to the street scene and the overall urban environment of an area, we continue to maintain that there is a need to introduce, in the Design and Heritage section of the Core Strategy, a Management Strategy policy on the lines of that presently included at Policy D8 of the UDP. This would help to reinforce the important part that trees play in the environment as exemplified in the management strategy sections of the several Conservation Area appraisal documents undertaken by the Council.</p>					
	Policy DH1 Design	167229	Ms Lucy Owen	Yes	No	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 comply with, that there is no reference to using the river to transport construction materials to and waste materials from development sites where practicable. Such a reference would accord with London Plan policy 7.26 which seeks for development close to navigable waterways to maximise water transport for bulk materials, particularly during demolition and construction phases.	Include an additional bullet point in policy DH1 which expects development to maximise water transport (construction materials to and waste materials from development sites) where practicable				<a href="#">339</a>
	Policy DH1 Design	167239		Not specified	Not specified	Policy DH1 is broadly supported by GH. However, the policy does not differentiate between conversions and new development. In this respect, the policy's current form could be strictly applied to a conversion and render the proposal to be undeliverable. Within the context of the inherent site constraints of many of Greenwich's historic buildings, it is necessary to make this differentiation.	<p>We therefore request a slight amendment to the policy to read as follows:</p> <p>"To achieve a high quality of design, all new developments are expected to:"</p> <p>We also request the following sentence is added to the end of the policy:</p> <p>"Applications for the conversion of existing buildings will be expected to meet the provisions of the policy, wherever possible."</p>	760672	Ed Britton	Deloitte Real Estate	<a href="#">393</a>
	Policy DH2 Tall Buildings	748094	Mr Neil Smith	No	No	Whilst the policy is supported ie Tall Buildings on the Peninsula the supporting diagram figure needs to be clearer and include all the land on the Peninsula. At present the diagram/figure is slightly misleading in that land at Peninsula Quays on the northwest area of the Peninsula is not included and hence needs revision/updating.	Amend plan as per the above comments.				<a href="#">9</a>
	Policy DH2 Tall Buildings	634722	Crossrail	Not specified	Not specified	<p>Within Policy DH2, Woolwich town centre is listed as an appropriate location for tall buildings</p> <p>which we support. We agree that this location is appropriate due to its high connectivity to</p>		634723	Stephen Harrington	GVA Grimley	<a href="#">96</a>

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						central London and its ambition to re-assert itself as a major town centre.					
	Policy DH2 Tall Buildings	147465	Graham Saunders	Not specified	Not specified	<p>We note that a Tall Building Assessment has been prepared which has been used to inform</p> <p>this policy. However as expressed already we have not seen the final version of this work.</p> <p>In addition access to it via the Council’s web page is not possible. As you will be aware we</p> <p>provided detailed comments to the 2010 draft version (response letter dated 24th November</p> <p>2010) which include issues relating to:</p> <p>· Clarity on how the policy position was arrived at. Was it developed from an evidence</p> <p>base that demonstrated a clear understanding of its environmental characteristics</p> <p>including its historic environment in accordance with national policy (PPS1 and PPS5</p> <p>at the time responding, but replicated in the NPPF).</p> <p>· An absence of any map-based assessment of the character of the borough.</p> <p>· The full range of Greenwich’s extensive and internationally significant heritage assets</p> <p>appearing not to have been adequately assessed against the potential harm that tall</p> <p>buildings may cause to them, contrary to national policy (PPS5 at the time</p> <p>responding, but replicated in the NPPF).</p> <p>· The borough’s wider character including non-designated heritage assets and the</p> <p>wider historic environment appearing not to have been robustly assessed within the</p> <p>draft version seen as advised by national policy (PPS1 and PPS5 again at the time of</p>				<a href="#">195</a>	

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						<p>responding, but replicated in the NPPF).</p> <p>· The way in which the Area Appraisals appear to have been assessed as places, with</p> <p>an overemphasis on proposed change and extant permissions and not demonstrating</p> <p>sufficiently an understanding of heritage assets, particularly in areas such as</p> <p>Greenwich Riverside.</p> <p>We appreciate that the policy seeks to identify potential locations for tall buildings, which in</p> <p>principle as an approach is encouraged. However the articulation of these areas is very</p> <p>broad and potentially open to unnecessary disputes over where the policy (accompanied by</p> <p>the map) will direct tall buildings. In addition as we have not seen the details of the final</p> <p>version of the Assessment we would reserve our concerns with regards to the robustness of</p> <p>the evidence supporting the proposed policy direction. A copy of the final Assessment should</p> <p>be made available to all for further consideration.</p>					
	Policy DH2 Tall Buildings	147829	Ms Anna Townend	Not specified	No	Even the UDP policies have been continuously flouted by current developments. The Core Strategy commitments will further extend this along the River Thames (as evidenced by the current Royal Arsenal/Warren planning consents) already given, putting at risk the heritage complex of buildings and compounding this "unsound" decision to build over the Public Park. This approach to high density high rise is compounded by the (out of date) Masterplan for North Greenwich Peninsula and West Greenwich. Both are unsustainable and undeliverable in current form, and represent unmanageable development being added to inadequate infrastructure well beyond the existing "built footprint" of the area in terms of West Greenwicch and Woolwich, and beyond the "carrying capacity" of the former marsh land of the Greenwich Peninsula, which will be vulnerable to the rising water levels or climate change impacting also on views of the Maritime World Heritage	Reduction of Density Concentrations in existing Masterplans and Review of masterplans for Woolwich and Greenwich Peninsula				<a href="#">360</a>
	Policy	148451	Tilfen	No	No	Policy DH2 relates to tall buildings and identifies various	For clarity we would recommend that the Figure	38243	Mr	Blue Sky	<a href="#">300</a>

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	DH2 Tall Buildings					possible locations including Tamesis Point and Thamesmead Town. Tilfen Land support Policy DH2 but would draw attention to its comments regarding the associated figure on Page 95. "We support the identification of Thamesis/Tripcock Point and Thamesmead Town on Figure on Page 95 as locations where "Tall Buildings" will be appropriate in principle. Notwithstanding, for clarity we would recommend that the Figure is amended to explicitly include the area of ThamesisiTripcock Point comprising the river frontage.	on P95 is amended to explicitly include the area of Thamesis / Tripcock Point comprising the river frontage.	3	Craig Blatchford	Planning	
	Policy DH2 Tall Buildings	501408	Mr John Franklin	Not specified	No	This is insufficiently informative and weak as a tool for the control of development. The Greenwich Society commented at the Draft Core Strategy stage the policy should incorporate the wording of the current UDP Policy D28, 'High Buildings', and we reiterate our concern here.	Incorporate stronger wording, including criteria in UDP Policy D28 and a definition of 'Tall Buildings'.				<a href="#">141</a>
	Policy DH2 Tall Buildings	502653	Linda Pound	Not specified	No	It is of concern that "tall buildings" are so loosely defined. Once one tall building has been allowed, there is precedent for more  and also for imperceptible "creep", for example, from Woolwich through Charlton Riverside to the Greenwich Peninsula. The Charlton Riverside Masterplan speaks of new housing on the design principles of the Georgian Terrace as adapted, for, example, in the Olympic Legacy Masterplan. However, a high rise "super density" scheme for the Royal Arsenal site has been approved recently, setting a precedent for tower block development. This creates potential for high rise blocks to expand westwards, and creating an enclave entirely separate from existing communities. On Riverside, there would be a lack of integration with the rest of Charlton, whatever links between the Peninsula and Woolwich might be in place. This isolation from the rest of Chariton carries the risk of grave social harm.	Define exactly what is meant in terms of tall buildings for Charlton Riverside with a view to protecting the original plan for a high quality, low rise development of proper streets. As the Mayor of London, and the London Assembly's Housing and Regeneration Committee have pointed out very recently, Tower blocks "are not conducive to community living" and do not work. More exactitude is required to prevent the creation of an ad hoc unwritten policy via precedent which would destroy the true vision of the Riverside Masterplan, CCRA suggests that 4 storeys should be the maximum.				<a href="#">302</a>
	Policy DH2 Tall Buildings	166972	Cathedral Group	Yes	No	Cathedral Group supports the principle of tall buildings at Greenwich Peninsula West. However, the supporting plan shows areas where tall buildings may be appropriate and other areas that are sensitive or need further assessment. Cathedral Group urges RBG to recognise that the areas drawn on the map area are indicative and should be treated flexibility as 'fuzzy' boundaries rather than using the area as precise zones. This could be taken to be implicit given the way the areas are drawn but it should be made explicit.	A statement should be included to say that the map at page 95 shows indicative rather than precise zones. The policy should also be more positive stating that tall buildings will be supported in appropriate locations subject the other policies in the Plan. The would still allow for the rigorous testing at the application stage that is no doubt envisaged by the DPD but would at the same time encourage proposals for tall buildings in order to meet the spatial objectives of the plan.  The policy would be more effective for this to be made explicit and would greater assist RBG during the determination process and developers wishing to invest in the area.	188810		Nathaniel Lichfield and Partners	<a href="#">494</a>

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	Policy DH2 Tall Buildings	166972	Cathedral Group	Yes	Yes	Within Policy DH2, Charlton Riverside is listed as an appropriate location for tall buildings which we support. We agree that tall buildings can help support regeneration and enhance the growth of Strategic Development Locations, which is in accordance with the Borough’s aims for Charlton Riverside.		228178	Ms Diana Thomson	GVA Grimley	<a href="#">469</a>
	Policy DH2 Tall Buildings	167229	Ms Lucy Owen	Yes	No	Given the ongoing discussions between the PLA and the Council concerning tall buildings within the Borough and their potential detrimental impacts on the PLA's navigational equipment and therefore the safety of vessels navigating on the River Thames, it is surprising that there is no reference in the policy or the supporting text to tall buildings needing to be in appropriate locations and mitigation being secured where necessary.	Include a reference to early discussions being needed with the PLA, tall building needing to be in appropriate locations and mitigation being secured where necessary				<a href="#">341</a>
	Policy DH3 Heritage Assets	757596	The Charlton Society	Yes	No	Conservation area reviews are too infrequent and repeatedly delayed, with a failure fully to assess conservation quality and the potential for area expansion. All Council departments also fail to work together to maximise the quality of associated public spaces and streetscapes.	Conservation Area reviews should be biennial (for broad assessment) and quinquennial (for detailed assessment). Council departments must also work together at all times to maintain a fully integrated approach to the public spaces and streetscapes of Conservation Areas.				<a href="#">51</a>
	Policy DH3 Heritage Assets	147465	Graham Saunders	Not specified	Not specified	Our understanding is that this policy seeks to provide an overarching approach to the  management of the historic environment in the Royal Borough, with supporting development  management policies articulating heritage specific issues. If this is the intention then this  policy (DH3) needs to be broadened in order to provide a robust strategic policy in line with  the NPPF (para 126). This includes the need for the strategic policy to set out what the  Council will seek to deliver as a priority, when managing the historic environment, based  Clarity in the policy and in the supporting text detailing how the historic environment  might inform the location, design and use of future development and contribute to  identity and distinctiveness of the Royal Borough and its distinctive places  · Identify links between the historic environment and other policy areas, e.g. design,				<a href="#">196</a>	

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						<p>public realm, green infrastructure, landscape, regeneration, economic development</p> <p>and tourism, and climate change</p> <p>· Set out broadly how conservation areas and other heritage assets will be managed</p> <p>and reviewed, such as maintaining and reviewing Conservation Area Appraisals and</p> <p>Management Plans and using appropriately Article 4 Directions</p> <p>· Identify where additional SPDs are being developed in order to provide greater detail</p> <p>· How the elements of the strategic policy will be delivered, by whom, and what</p> <p>resources will be required. This could be discussed in the supporting text.</p> <p>· Consideration of how CIL/S106 agreements could contribute towards the</p> <p>enhancement of individual assets or specific historic places. This could be addressed</p> <p>here or under Planning Obligations.</p> <p>· What level of information is expected to be submitted when the development could</p> <p>have an impact upon the significance of a heritage asset or assets.</p> <p>The subsequent policies in the development management should then articulate in detail how</p> <p>proposal will be assessed, in relation to the type of heritage asset affected.</p> <p>upon the Royal Borough’s evidence base. On considering what should be included in a</p> <p>strategic policy in addition to that proposed, we would suggest that the following points be</p> <p>included:</p>					

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						<p>· Under the supporting text describe what evidence has been used and how this</p> <p>strategic policy will help deliver the vision and objectives of the Plan</p> <p>· Identify the condition of the historic environment and include a commitment in the</p> <p>policy to addressing heritage assets that are at Risk (as identified by the English</p> <p>Heritage’s Heritage at Risk Register).</p> <p>· Identify any potential threats to the historic environment and how these might be</p> <p>addressed. We would advise that this could be achieved through the a policy</p> <p>commitment to promoting conservation-led regeneration, as articulated in English</p> <p>Heritage’s Constructive Conservation, and London Plan policy 7.9.</p>					
	Policy DH3 Heritage Assets	147698	Laurie Baker	Not specified	Not specified	The Society continues to endorse strategic policies DH1, DH2 and DH3. The Society does not see the Eltham area as an appropriate location for tall buildings and is glad that planning policy as drafted supports that view. The completion of Conservation Area Appraisals is supported.	The Society urges the addition in DH3 of “and their settings” at the end of “the presumption in favour of the preservation of statutory listed buildings”.				<a href="#">154</a>
	Policy DH3 Heritage Assets	762451	Laura Williams	Yes	No	<p>The policy currently lacks any emphasis on the role that other cultural assets can play in delivering the policy’s objective.</p> <p>Aluna uniquely combines the measurement and display of the moon’s movements and the tides it creates into a bespoke, precision engineered, monumental timepiece. The measurement of time, and London’s resulting status as a centre of global trade and culture, has its roots in the Royal Observatory Greenwich and the establishment of the Greenwich datum and Greenwich Mean Time.</p> <p>The innovative and unique nature of the Aluna landmark adjacent to a historic public draw dock will celebrate and bring a modern dimension to Greenwich’s historic and world -renowned maritime and scientific heritage. This aim is entirely in line with the underlying themes in policy DH3.</p> <p>As an internationally significant cultural visitor attraction,</p>	4.4.25 The historic areas of the Borough are inherently important in their own right and worth cherishing. But these areas can also act as a stimulus to inspire new buildings and cultural assets of imaginative and outstanding quality design that positively help to preserve or enhance the appearance and character of the area. This aim is exemplified by innovative developments such as the proposed Aluna landmark project.				<a href="#">480</a>

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						<p>Aluna presents a strong regeneration opportunity for Royal Greenwich, and a symbol of the Borough’s sustainable development. This is consistent with the London Plan, which provides at Policy 4.6C (d), that local boroughs should, in plan-making, :</p> <p>“promote and develop existing and new cultural and visitor attractions especially in outer London and where they can contribute to regeneration and town centre renewal “.</p> <p>See above. London Plan Policy 7.9 is also relevant and provides that:</p> <p>“Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration.”</p> <p>The Mayor's Cultural Strategy, Nov 2010, Policy Action 4.4. also provides that:</p> <p>“the Mayor is championing heritage in London - preserving the historic built environment through the London Plan, but also ensuring through the Story of London and other activities that the capital’s heritage is understood, explored and celebrated by as many Londoners as possible.”</p>					
	Policy DH4 Maritime Greenwich World Heritage Site	147465	Graham Saunders	Not specified	Not specified	<p>The first line of the policy could be misinterpreted. It should advise that the Outstanding</p> <p>Universal Value (OUV) of the Maritime Greenwich World Heritage Site (MGWHS) is not</p> <p>solely defined on the Proposals Map. The OUV of the Site is discussed in the inscription</p> <p>documents presented to UNESCO, and the Statement of OUV. In addition all developments,</p> <p>whether they are in or outside of the boundaries of the MGWHS should protect and enhance</p> <p>the OUV’s, integrity, authenticity and significance of the Site.</p> <p>The policy could also be expanded to include a reference to the promotion of the MGWHS as</p> <p>a cultural asset, and the active implementation of the Site’s Management Plan</p>				<a href="#">197</a>	
	Policy	148036	Ms	Not	No	We object to Policies E(a) Pollution (particularly in relation					<a href="#">427</a>

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	E(a) Pollution		Jenny Bates	specified		<p>to air pollution) and E(c) Air Pollution</p> <p>Policy E(a) only says that planning permission would not normally be granted where it "would generally have a significant adverse effect" and "especially" where proposals would be likely to result in "unacceptable emission" of "fumes, dust..."</p> <p>Policy E(c) Air pollution only talks about "development proposals with the potential to result in any significant impact on air quality will be resisted unless measures to minimise the impact of air pollutants are included" and implies that a 'design mitigation hierarchy'</p> <p>These criteria do not seem sufficient as they do not commit Greenwich to meeting EU legal limits or playing its part in London meeting them.</p> <p>London Plan Policy 7.14, section C on LDF preparation does not seem to properly reflected.</p> <p>To make these sound there needs to be reference to the need to meet EU legal limits, and be clear that levels cannot be exceeded once limits have been met, and cannot be worsened if already exceeding. We also suggest a target for road traffic reduction commensurate with meeting EU legal limits.</p> <p>NB other policies and proposals may need to be altered and new ones developed in order to fulfill this.</p> <p>This is in accordance with the principles of Sustainable Development that have to be at the heart of planning ie that this key environmental limit is met, along with social goals - and that economic development is pursued in such a way to achieve that.</p> <p>Greenwich, as well as London overall (as one of the UK's 43 zones) is badly failing EU legal limits for NO2 a toxic gas. The deadline for compliance with EU legal limits was 2010, with an extension up to 2015 later an option (with limits needing to be met as soon as possible) . The government's failure to produce plans that would see London meet limits by 2015 were the subject of a Supreme Court case, with some issues being currently referred to the European court.</p> <p>Levels of particulates (PM10) are close to EU legal limits in London (for which the deadline was 2005 with a contentious extension to 2011 also now run out) - but actually the World Health Organisation ( WHO) say there</p>					

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						<p>are no safe limits for particulates and are currently recommending that the EU bring their requirements into line with the WHO guidelines, which are twice as stringent as the EU's current limits.</p> <p>Local Authorities are required to declare an Air Quality Management Area if limits were not expected to be met, and as paragraph 4.6.43 states the whole borough has been declared an AQMA.</p> <p>London Assembly has a paper on air pollution</p> <p><a href="http://www.london.gov.uk/sites/default/files/Air%20pollution%20issues%20paper%20pdf_0.pdf">http://www.london.gov.uk/sites/default/files/Air%20pollution%20issues%20paper%20pdf_0.pdf</a></p> <p>The GLA has produced a document on Air Quality in Greenwich:</p> <p><a href="http://www.london.gov.uk/sites/default/files/RB%20Greenwich%20Air%20Quality%20Guidance.pdf">http://www.london.gov.uk/sites/default/files/RB%20Greenwich%20Air%20Quality%20Guidance.pdf</a></p> <p>which also includes recommendations for action.</p> <p>Air pollution is a combustion problem (ie including biomass and gas boilers and plant) but is mainly a traffic problem (and diesel engines are particularly bad)</p> <p>Air pollution hits the most vulnerable in our society the hardest ie the young and elderly and most disadvantaged who tend to live near the main roads where traffic and air pollution is worst - so tackling it helps tackle inequalities ie health inequalities, and failure to tackle it is a failure to address healthy inequalities.</p> <p>It is a major health hazard - 2nd only to smoking for premature deaths. A GLA report says more than 4,000 people die in London prematurely in a year, and the Air Quality in Greenwich report states that the figure for Greenwich is 150.</p> <p>Local Authorities now have new responsibilities on health, and the government's website shows figures under indicator 3.01 of the Public Health Outcomes Framework - the Fraction of mortality attributable to particulate air pollution - and for Greenwich the figure is 7.2%</p> <p><a href="http://www.phoutcomes.info/public-health-outcomes-framework#gid/1000043/par/E12000007/ati/102/page/0">http://www.phoutcomes.info/public-health-outcomes-framework#gid/1000043/par/E12000007/ati/102/page/0</a></p> <p>EU legal limits must be met, and not exceeded once attained - and also pollution must not be made worse if it is</p>					

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						<p>already exceeding. Further, the whole of the London zone must meet the limits for it to comply - and one part of London or Greenwich can't be traded off against another.</p> <p>Doing anything to worsen the problem eg generating new traffic from building new road river crossings (see below), would just make it harder to meet limits (and the Mayor and Greenwich are not prepared now to take the action needed to cut traffic and tackle air pollution)</p> <p>Instead (as well as cleaner vehicles) we need to cut traffic levels - planning areas to reduce the need for people to have to travel unnecessarily (ie we need to make sure key amenities and jobs/workplaces are within easy walking and cycling distance), investing in making walking and cycling safer, and improving public transport (ie as end of climate section above)</p> <p>Greenwich should adopt PHOF indicator 3.01, and other sustainable transport related ones (referred to in the Air Quality in Greenwich document)</p>					
	Policy E(a) Pollution	502653	Linda Pound	Not specified	No	<p>It is appreciated that RBG has an interest in promoting mixed use developments and wishes to relocate certain types of business from Charlton Riverside so as to increase its housing potential. Policies E(a) and E(b) are designed to achieve this. However, there are flaws.</p> <p>Although Policy E(a) states that "housing and other sensitive uses will not normally be permitted on sites adjacent to existing problem uses etc", housing may be built on such sites if a developer can make a case for "amelioration" and conditions are imposed. For large scale developments, no doubt resources would be available to ensure "amelioration" took place through a system of planning conditions supported by enforcement action. However, in the case of smaller scale developments, local experience is that the necessary resources in Planning and Enforcement are not available, and serious harm can and does occur because neither adequate monitoring nor enforcement happens.</p>	<p>Rewrite Policy E(a) to differentiate between the large scale projects where amelioration/monitoring/enforcement of problem uses are realistic objectives; and the small scale where housing development should not be permitted at all. Suggested wording:</p> <p>remove the word "normally" from Policy E(a) and ensure that there is good quality and frequent monitoring and enforcement of the small scale development as well as the large.</p>				<a href="#">305</a>
	Policy E(a) Pollution	167229	Ms Lucy Owen	Yes	No	Whilst it is noted that noise pollution is covered in London Plan policy 7.15 it is still considered that noise should be added to the list of emissions in policy Ea). For example there is a policy in the London Plan on air quality (7.14) but there are air quality related criteria in policy Ea)	Include a reference to noise in policy Ea)				<a href="#">346</a>
	Policy E(b) Pollution from	148036	Ms Jenny	Not specified	Not specified	<p>City Airport has development plans including to accommodate larger aircraft:</p> <p><a href="http://www.londoncityairport.com/cadp">http://www.londoncityairport.com/cadp</a></p>					<a href="#">429</a>

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	Existing Uses		Bates			While Policy E(b) Pollution from Existing Uses says "The Council will seek to reduce nuisance caused by existing uses from the emission of noise...by:" Greenwich should include reducing the numbers affected by unacceptable levels of noise  (see also below re IM(d) )					
	Policy E(b) Pollution from Existing Uses	502653	Linda Pound	Not specified	No	There is no differentiation here between large and small scale operations. It may be relatively easy to control a large scale operation (where money supplies and publicity will be taken in to account by a company board). However, a small scale business (eg a back street work shop) could present difficulties. Nuisance may not be experienced by neighbours living 100 yards away, but would be obvious if houses were built at a closer distance. If a small scale housing project were to be proposed in such a locality, there may be little scope to reduce/ameliorate activities; and if either relocation or business closure were the options, employment	The differences between both large and small scale housing projects and between large and small scale nuisance operations should be taken in to account.  There should be a clear statement that small scale housing developments will not be permitted near small scale activities which result in noise, fumes, light, dust, grit, odours or vibration. Small local businesses have little scope to change their practices, but their removal from the local economy would be detrimental.				<a href="#">307</a>
	Policy E(b) Pollution from Existing Uses	502194	Waite	Yes	No	There is no recognition here of the difference between large scale and small scale operations. You may be able to deal adequately with a large scale business but the single small workshop in a residential area is different. It may be at a distance from exisitng housing and therefore cause no nuisance, but this would change if housing were proposed right next door. Enforcement action regarding planning conditions rarely happens and if the only options became relocation or closure jobs would be lost to the very local economy.	Accept that one size does not fit all.  Ensure that small scale housing projects will not be permitted near exisitng small scale business with 'nuisance' potential from emissions of any kind. This will protect all parties.				<a href="#">439</a>
	Policy E(c) Air Pollution	148464	Mr Lawrence Smith	Yes	No	To be effective, measures to reduce transport emissions must include the need to avoid any increase in overall traffic levels within the Borough. This requires that support for any new river crossings (see policy IM3) must be combined with support for measures (such as road user charging) to prevent the increase in traffic that would otherwise be expected.	Add at the end of the 2nd paragraph: “In addition, we will advocate and support measures to avoid any increases in overall traffic levels within the Borough, and our support for new river crossings will be conditional on the their being combined with measures to prevent consequential increases in traffic.”				<a href="#">40</a>
	Policy E(c) Air Pollution	148036	Ms Jenny Bates	Not specified	No	We object to Policies E(a) Pollution (particularly in relation to air pollution) and E(c) Air Pollution  Policy E(a) only says that planning permission would not normally be granted where it "would generally have a significant adverse effect" and "especially" where proposals would be likely to result in "unacceptable emission" of "fumes, dust..."  Policy E(c) Air pollution only talks about "development proposals with the potential to result in any significant impact on air quality will be resisted unless measures to					<a href="#">428</a>

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						<p>minimise the impact of air pollutants are included" and implies that a 'design mitigation hierarchy'</p> <p>These criteria do not seem sufficient as they do not commit Greenwich to meeting EU legal limits or playing its part in London meeting them.</p> <p>London Plan Policy 7.14, section C on LDF preparation does not seem to properly reflected.</p> <p>To make these sound there needs to be reference to the need to meet EU legal limits, and be clear that levels cannot be exceeded once limits have been met, and cannot be worsened if already exceeding. We also suggest a target for road traffic reduction commensurate with meeting EU legal limits.</p> <p>NB other policies and proposals may need to be altered and new ones developed in order to fulfill this.</p> <p>This is in accordance with the principles of Sustainable Development that have to be at the heart of planning ie that this key environmental limit is met, along with social goals - and that economic development is pursued in such a way to achieve that.</p> <p>Greenwich, as well as London overall (as one of the UK's 43 zones) is badly failing EU legal limits for NO2 a toxic gas. The deadline for compliance with EU legal limits was 2010, with an extension up to 2015 later an option (with limits needing to be met as soon as possible) . The government's failure to produce plans that would see London meet limits by 2015 were the subject of a Supreme Court case, with some issues being currently referred to the European court.</p> <p>Levels of particulates (PM10) are close to EU legal limits in London (for which the deadline was 2005 with a contentious extension to 2011 also now run out) - but actually the World Health Organisation ( WHO) say there are no safe limits for particulates and are currently recommending that the EU bring their requirements into line with the WHO guidelines, which are twice as stringent as the EU's current limits.</p> <p>Local Authorities are required to declare an Air Quality Management Area if limits were not expected to be met, and as paragraph 4.6.43 states the whole borough has been declared an AQMA.</p> <p>London Assembly has a paper on air pollution</p>					

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						<p><a href="http://www.london.gov.uk/sites/default/files/Air%20pollution%20issues%20paper%20pdf_0.pdf">http://www.london.gov.uk/sites/default/files/Air%20pollution%20issues%20paper%20pdf_0.pdf</a></p> <p>The GLA has produced a document on Air Quality in Greenwich:</p> <p><a href="http://www.london.gov.uk/sites/default/files/RB%20Greenwich%20Air%20Quality%20Guidance.pdf">http://www.london.gov.uk/sites/default/files/RB%20Greenwich%20Air%20Quality%20Guidance.pdf</a></p> <p>which also includes recommendations for action.</p> <p>Air pollution is a combustion problem (ie including biomass and gas boilers and plant) but is mainly a traffic problem (and diesel engines are particularly bad)</p> <p>Air pollution hits the most vulnerable in our society the hardest ie the young and elderly and most disadvantaged who tend to live near the main roads where traffic and air pollution is worst - so tackling it helps tackle inequalities ie health inequalities, and failure to tackle it is a failure to address healthy inequalities.</p> <p>It is a major health hazard - 2nd only to smoking for premature deaths. A GLA report says more than 4,000 people die in London prematurely in a year, and the Air Quality in Greenwich report states that the figure for Greenwich is 150.</p> <p>Local Authorities now have new responsibilities on health, and the government's website shows figures under indicator 3.01 of the Public Health Outcomes Framework - the Fraction of mortality attributable to particulate air pollution - and for Greenwich the figure is 7.2%</p> <p><a href="http://www.phoutcomes.info/public-health-outcomes-framework#gid/1000043/par/E12000007/ati/102/page/0">http://www.phoutcomes.info/public-health-outcomes-framework#gid/1000043/par/E12000007/ati/102/page/0</a></p> <p>EU legal limits must be met, and not exceeded once attained - and also pollution must not be made worse if it is already exceeding. Further, the whole of the London zone must meet the limits for it to comply - and one part of London or Greenwich can't be traded off against another.</p> <p>Doing anything to worsen the problem eg generating new traffic from building new road river crossings (see below), would just make it harder to meet limits (and the Mayor and Greenwich are not prepared now to take the action needed to cut traffic and tackle air pollution)</p> <p>Instead (as well as cleaner vehicles) we need to cut traffic</p>					

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						<p>levels - planning areas to reduce the need for people to have to travel unnecessarily (ie we need to make sure key amenities and jobs/workplaces are within easy walking and cycling distance), investing in making walking and cycling safer, and improving public transport (ie as end of climate section above)</p> <p>Greenwich should adopt PHOF indicator 3.01, and other sustainable transport related ones (referred to in the Air Quality in Greenwich document)</p>					
	Policy E(c) Air Pollution	502653	Linda Pound	Not specified	No	<p>Research/fact finding are sketchy/insufficiently detailed and do not take account of the most recent legal situation.</p> <p>The whole of Greenwich is an Air Quality Management Area but improvement, especially in reducing NO2, is not happening quickly enough. On 1 May 2013, the Supreme Court ruled that the government is in breach of Article 13 of the EU Air Quality Directive. This paves the way for the European Commission to take legal action against the UK; and an earlier date than 2020- 2025 for substantial improvement may well be deemed necessary by the EU Court which is now dealing.</p> <p>In the current economic climate, it is only too possible that, with increasing development, road traffic will increase with concomitant increase in air pollution. This is recognised in the Core Strategy (paras 34.8-3.4.16). Reference to the Sustainability Appraisal, Section 5.1.2, points 1-31 also indicates that there are tensions between the development proposals and provision of infrastructure which are not to the benefit of residents.</p> <p>Para 4.6.43 does little to assist in ameliorating air quality. In particular, its provisions regarding a design mitigation hierarchy only apply to residential sites, thus leaving schools and other community facilities at risk from being situated too near to roads with heavy traffic (as, for example, the proposed school at the junction of the Woolwich Road and Anchor &amp; Hope Lane), Residents are also concerned that amendment to design mitigations will be allowed so as to assist achievement of housing targets; and that air pollution in Charlton will increase rather than decrease.</p>	<p>There needs to be a much more robust approach to ensuring air pollution decreases. There should also be firm proposals and wording to force developers into appropriate action.</p> <p>The final para of Policy E(c) should be reworded to read that</p> <p>"All development proposals within areas that are currently exposed to air quality concentrations.....must take in to account...."</p> <p>Para 4.6.46 should have the phrase "reducing residential exposure" replaced with "reducing exposure in all categories of use". Workers and students, for example, may spend a considerable proportion of their day in adverse settings, and need as much protection as residents.</p>			<a href="#">309</a>	
	Policy E(c) Air Pollution	745440	Ms Sharon Hayward	Not specified	No	<p>The policy is unsound because: it fails to commit to meeting EU legal limits around air pollution and thus it fails to commit to delivering sustainable development / and living within environmental limits. Air pollution has greatest impact on the most vulnerable (young and old) and is primarily a traffic problem.</p>	<p>To ensure the policy is sound are,</p> <ul style="list-style-type: none"><li>• targets should be set for reducing air pollution</li><li>• private car use should be discouraged and support should be provided for the use of public transport, cycle use and walking</li></ul>				<a href="#">336</a>

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							<ul style="list-style-type: none"> <li>• Lifetime Neighbourhoods should be developed, with local employment and thus reduced transport needs</li> <li>• storage areas of bicycles should be provided on or near housing estates and developments</li> </ul>				
	Policy E(c) Air Pollution	760607	Alan Haughton	Not specified	Not specified	<p>Greenwich policy E(c) Air pollution does not appear to commit to meeting EU legal limits or playing it's part in London meeting them.</p> <p>Policy only talks about "development proposals with the potential to result in any significant impact on air quality will be resisted unless measures to minimise the impact of air pollutants are included" which does not seem sufficient.</p>	EU legal limits must be met, and not exceeded once attained and pollution must not be made worse if it is already exceeding. Generating new traffic from building new road river crossings would just make it harder to meet legally required limits.				<a href="#">366</a>
	Policy E(d) Hazardous Materials	166972	Cathedral Group	Yes	No	<p>The policy needs to be clarified to make it clear that proposals for the extension of existing hazardous facilities will be considered in the context of the development strategy set out within the Statutory Development Plan.</p> <p>At Greenwich Peninsula West specifically, the SDP proposals are currently subject to the constraints posed by hazardous substances at the Gas Holder and Brenntage facilities. The adopted masterplan for the area ultimately needs the removal of these two facilities to enable the delivery of the vision and indeed much of the delivery of the Core Strategy Strategic Development Location.</p> <p>To this end, RBG in its role as the Council and the Local Planning Authority, should demonstrate leadership and help to facilitate the removal/relocation of these two facilities. RBG as the Hazardous Substances Authority must assist in enabling development on the Peninsula to realise the plan.</p>	One policy measure that will assist is the addition of a sentence to the proposed policy that states that in considering applications for hazardous substances consent, section 9 of the Planning (Hazardous Substances) Act 1990 requires that such decisions are made as for normal planning applications- i.e. in accordance with the development plan unless material considerations dictate otherwise.	188810		Nathaniel Lichfield and Partners	<a href="#">498</a>
	Policy E(f) Living Roofs and Walls	634722	Crossrail	Not specified	Not specified	<p>Whilst policy 5.1 of the London Plan encourages the use of urban greening to reduce the effects of climate change it does not require all new developments to include living roofs or walls, as Policy E(f) seems to suggest for Greenwich. In accordance with the London Plan, we do not support a Borough wide requirement for urban greening as many sites may be unsuitable. Site specific circumstances should be taken into account within this policy.</p>		634723	Stephen Harrington	GVA Grimley	<a href="#">99</a>
	Policy E(f)	148451	Tilfen	No	No	Policy E(f) requires new development to be designed to incorporate living walls or roofs. Tilfen Land has no	The requirement should be subject to a test of viability and practicability having regard to the	382433	Mr	Blue Sky Planning	<a href="#">303</a>

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	Living Roofs and Walls					objection to this aspiration in principle but recommends that the requirement be subject to a test of viability and practicability having regard to the particular circumstances of the proposed development, the site characteristics, etc.	particular circumstances of the proposed development, the site characteristics, etc.		Craig Blatchford		
	Policy E(f) Living Roofs and Walls	166972	Cathedral Group	Yes	No	Whilst policy 5.1 of the London Plan encourages the use of urban greening to reduce the effects of climate change it does not require all new developments to include living roofs or walls, as Policy E(f) seems to suggest for Greenwich. In accordance with the London Plan, we do not support a Borough wide requirement for urban greening as many sites may be unsuitable. Site specific circumstances should be taken into account within this policy.		228178	Ms Diana Thomson	GVA Grimley	<a href="#">474</a>
	Policy E1 Carbon Emissions	634722	Crossrail	Not specified	Not specified	<p>Policy E1 requires the on-site provision of a decentralised energy network where both feasible</p> <p>and viable, if an existing network cannot be connected to. We support this recognition of</p> <p>feasibility and viability, and we suggest that connection to an existing network should also take this into account. The feasibility and viability of sustainability measures is a key factor in</p> <p>determining whether development proposals can come forward</p>		634723	Stephen Harrington	GVA Grimley	<a href="#">98</a>
	Policy E1 Carbon Emissions	148036	Ms Jenny Bates	Not specified	No	<p>We object to Policy E1 Carbon Emissions</p> <p>This does not have any target for CO2 reduction, and paragraph 4.6.6 just says the council is 'committed to tackling climate change and reducing carbon dioxide emissions'</p> <p>Paragraph 4.6.4 refers to the Mayor's target to cut CO2 by 60% by 2025 on 1990 levels, but again not to the need to develop detailed policies and proposals consistent with that target, as required by the London Plan Policy 5.1B</p> <p>The London Plan</p> <p><a href="http://www.london.gov.uk/sites/default/files/LP2011%20Chapter%205.pdf">http://www.london.gov.uk/sites/default/files/LP2011%20Chapter%205.pdf</a></p> <p>PoLiCy 5.1</p> <p>Climate Change Mitigation</p> <p>Strategic</p> <p>A The Mayor seeks to achieve an overall reduction in</p>					<a href="#">426</a>

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						<p>London’s carbon dioxide emissions of</p> <p>60 per cent (below 1990 levels) by 2025.</p> <p>It is expected that the GLA Group, London boroughs and other organisations will contribute</p> <p>to meeting this strategic reduction target, and the GLA will monitor progress towards its</p> <p>achievement annually.</p> <p>LDF preparation</p> <p>B Within LDFs boroughs should develop detailed policies and proposals that promote and are</p> <p>consistent with the achievement of the Mayor’s strategic carbon dioxide emissions reduction</p> <p>target for London.</p> <p>The mayor's target is broadly consistent with the national requirement in the Climate Change Act of 2008 for 80% cut by 2050 (on 1990 levels)</p> <p><a href="http://www.theccc.org.uk/tackling-climate-change/the-legal-landscape/global-action-on-climate-change/">http://www.theccc.org.uk/tackling-climate-change/the-legal-landscape/global-action-on-climate-change/</a></p> <p>To be sound Policy E1 needs to set out that policies and proposals will be pursued in the strategy consistent with achieving the Mayor's target - indeed Greenwich adopting the same target for itself would be most helpful.</p> <p>NB other policies and proposals may need to be altered and new ones developed in order to fulfill this.</p> <p>This is in accordance with the principles of Sustainable Development that have to be at the heart of planning ie that this key environmental limit is met, along with social goals - and that economic development is pursued in such a way to achieve that.</p> <p>At the moment it is unclear if the policies and proposals would be consistent with achieving the Mayor's target - the net result needs to add up to adequate levels of cuts (ie it is completely unacceptable to just reduce emissions, which may not be by a sufficient amount).</p> <p>The issue of homes and energy efficiency is referred to in text, but we suggest the council should commit to prioritise</p>					

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						<p>funding ( and to lobby the Mayor for more support and funding) to significantly increase the insulation of homes to increase energy efficiency.</p> <p>Not only does this cut CO2/climate change emissions, but also cuts fuel bills ie helping fuel poverty, and also helps create jobs ie a classic Sustainable Development win-win-win.</p> <p>As paragraph 4.6.14 states, transport is a significant contributor to carbon emissions and as well as cleaner vehicles being necessary, we suggest the council commits to cutting traffic levels (by doing more to help walking and cycling and improving public transport, and not adding to the problem by building new roads/river crossings -see below) , which will also be needed for air pollution reasons (see below)</p> <p>Such a policy in another section could be referred to if needed.</p>					
	Policy E1 Carbon Emissions	167326	Mayor of London	Not specified	Not specified	<p>Policies 4A.2 to 4A.8 of the London Plan focus specifically on how to mitigate climate change, and the carbon dioxide emissions reduction targets that are necessary across London to achieve this. Developments are required to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions (be lean), adopting sustainable design and construction measures and prioritising decentralised energy (be clean), including renewables (be green).</p> <p>The Policy is on the whole in general conformity with London Plan policies although some changes should be incorporated which are set out below.</p> <p>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.</p> <p>The Core Strategy should reflect the London Plan targets for carbon dioxide reductions in line with Policy 5.2 of the London Plan (related to Part L 2010 Building Regulations targets).</p> <p>A policy on sustainable design and construction should also be included.</p>					<a href="#">172</a>
	Policy E1 Carbon Emission	537756	Mr Richard	Not specified	No	<p>This is unsound as it does not have any target, and 4.6.6 just says the council is 'committed to tackling climate change and reducing carbon dioxide emissions" This despite the</p>					<a href="#">248</a>

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	s		Lee			whole borough having been declared an Air Quality Management Area and Greenwich, as well as London, and most of the UK is badly failing EU legal limits for NO2 a toxic gas. )					
	Policy E1 Carbon Emissions	166972	Cathedral Group	Yes	No	<p>Cathedral Group objects to the threshold of 5 units for connection to an existing decentralised energy network or a site wide decentralised energy network. Whilst Cathedral Group supports the principles of lowering carbon emissions in the Borough, there is concern that this threshold is not justified in the evidence presented with the Core Strategy. This raises significant issues of viability and deliverability of these measures and the schmes as a whole.</p> <p>Further, whilst the policy allows for a lack of viablity and feasibility to be demonstrated, Cathedral Group anticipates that this will be required for a large number of planning applications and unnecessarily so.</p>	The threshold should be raised to a level that has been tested through the evidence to show that it is reasonable, achievable and effective.	188810		Nathaniel Lichfield and Partners	<a href="#">507</a>
	Policy E1 Carbon Emissions	166972	Cathedral Group	Yes	No	Policy E1 requires the on-site provision of a decentralised energy network where both feasible and viable, if an existing network cannot be connected to. We support this recognition of feasibility and viability, and we suggest that connection to an existing network should also take this into account. The feasibility and viability of sustainability measures is a key factor in determining whether development proposals can come forward.	See above.	228178	Ms Diana Thomson	GVA Grimley	<a href="#">473</a>
	Policy E1 Carbon Emissions	167229	Ms Lucy Owen	Yes	No	Policy E1 seeks to reduce carbon emissions and para 4.6.14 identifies that transport is a significant contributor to carbon emissions. With that in mind, it is surprising that there is no reference in the policy to using the river to transport construction materials to and waste materials from development sites where practicable. Such a reference would accord with London Plan policy 7.26	Include a reference in the policy which expects developments to maximise water transport (construction materials to and waste materials from development sites ) where practicable				<a href="#">344</a>
	Policy E1 Carbon Emissions	745440	Ms Sharon Hayward	Not specified	No	<p>The policy is unsound because: it does not provide the most appropriate and evidence-based policy in regard to the environmental impact of building new homes and or demolishing others. The policy fails to provide targets to facilitate any measuring of reductions in carbon emissions and fails to consider emissions in terms of the whole life-cycle of buildings.</p> <p>The carbon emitted during the whole life-cycle of buildings includes that emitted during the processes of material extraction, manufacturing, delivery to site, construction process, maintenance and refurbishment, waste processing, demolition and recycling that is, the elements that make up ‘embodied carbon’ of a building. Policy E1 is silent on embodied carbon, despite the large number of new developments proposed in the borough, including some that involve demolition of existing housing estates.</p>	<ul style="list-style-type: none"> <li>the policy must include targets for reductions in carbon emissions</li> <li>the energy assessment must include embodied carbon costs (for both new build and of any demolition of existing buildings)</li> <li>a section on retrofitting of existing homes should be included in this policy</li> <li>a reference should be made to policy H(a) with suggested changes detailed above</li> </ul>				<a href="#">335</a>

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						This policy does not mention retrofitting, despite the London Plan requiring that in their LDF's, boroughs should develop policies and proposals regarding the sustainable retrofitting of existing buildings.					
	Policy E1 Carbon Emissions	756674		Yes	No	Bengrove Investments LTD supports the principles of lowering carbon emissions in the Borough, however, there is a concern that the threshold for residential developments of five or more units connecting to an existing decentralised network is not justified in the evidence presented within the core strategy. This raises issues in terms of the viability and deliverability of these measures and the scheme as a whole.	The threshold should be raised to a level that has been tested through the evidence to show that it is reasonable, achievable and effective.	756671	Mrs Sarah Moorhouse	Associate Director Nathaniel Lichfield & Partners	<a href="#">443</a>
	Policy E1 Carbon Emissions	757394	Miss Susie Wilson	Not specified	No	<p>Policy E1 is not sound since it is not based on a strategy that seeks to meet objectively assessed development and infrastructure requirements and is not the most appropriate strategy, when considered with reasonable alternatives.</p> <p>For example in order to reduce carbon emitted during the whole life-cycle of buildings, including that emitted during the processes of material extraction, manufacturing, delivery to site, construction process, maintenance and refurbishment, waste processing, demolition and recycling that is, the elements that make up 'embodied carbon' of a building. Policy E1 is silent on this, despite the large number of new development proposed in the borough and some that involve demolition existing housing estates.</p> <p>The policies Environment and Climate change are not sound; they do not provide the most appropriate strategy since there is no strategic policy direction on retrofitting. The London Plan requires that in their LDF's boroughs should develop policies and proposals regarding the sustainable retrofitting of existing buildings.</p>	<p>To ensure that policy E1 is sound, it should provide that in schemes involving demolition of existing homes; energy assessments should include embodied carbon.</p> <p>To ensure that the policies relating to Environment and Climate Change are sound, a section is required on sustainable retrofitting buildings.</p>				<a href="#">457</a>
	Policy E1 Carbon Emissions	760607	Alan Haughton	Not specified	Not specified	Greenwich's policy E1 Carbon Emissions does not have any target, and 4.6.6 just says the council is 'committed to tackling climate change and reducing carbon dioxide emissions' - so does not seem to have followed what the London Plan policy 5.1B asks.	Cleaner vehicles and cutting traffic levels is needed. Doing more to help walking and cycling and improving public transport, and not adding to the problem by building new roads or car centric river crossings.				<a href="#">365</a>
	Policy E2 Flood Risk	265434	Carmelle Bell	Not specified	No	<p>Policy E2 is not considered to be effective in relation to sewer flooding and is not therefore considered sound. The Core Strategy states in Section 4.6.20 that sewer flooding does not appear to be problematic for the majority of Greenwich. However, new development has the potential to result in the overloading of the existing wastewater network infrastructure if there is not sufficient capacity to support the development which could result in on or off-site sewer flooding.</p> <p>The SFRA for Greenwich states that developers should</p>	<p>In order to ensure that Policy E2 is effective at ensuring that development is not affected by sewer flooding or results in sewer flooding off site it is considered that the policy should be revised as set out below.</p> <p>“ii. Demonstrating consideration of all forms of flood risk by preparing flood risk assessments, in line with advice from the Environment Agency and Thames Water. These must demonstrate:.....”</p>				<a href="#">83</a>

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						determine, in consultation with the Environment Agency, the sewerage undertaker, Transport for London and the relevant London Borough, whether their proposed development site is at risk from flooding and that developers seeking to develop a site at risk from flooding should undertake an appropriate flood risk assessment.	<p>Proposed additional supporting text for Policy E2:</p> <p>“4.6.20 Sewer flooding does not appear to be problematic in the majority of Greenwich but areas such as Eltham have experienced problems in the past. Developers will be required to demonstrate that adequate capacity exists within the wastewater network and that development will not lead to sewer flooding either on or off site. Where upgrades are required developers will need to demonstrate how these will be provided ahead of the occupation of development as set out in the supporting text for Policy IM1.”</p> <p>The above changes will ensure that Policy E2 is effective in addressing potential sewer flooding issues arising from development and ensure that the policy is consistent with the evidence base with regard to the SFRA.</p>				
	Policy E2 Flood Risk	147775	Mr Brian Regan	Yes	Yes	<ul style="list-style-type: none"> <li>Should Policy E2 make reference to the requirement for Sustainable Urban Drainage Systems (SUDS), not just the supporting text (paragraph 4.6.59)?</li> </ul>					<a href="#">111</a>
	Policy E2 Flood Risk	147698	Laurie Baker	Not specified	Not specified	The Society is concerned that this section does not include control of the increase in hard surfacing, which we feel should be kept to a minimum, especially if it is converting gardens or other soft surfaces.	At the least, an assessment needs to be done on the effect of run-off rather than allowing rainwater to soak away, to help reduce local flooding.				<a href="#">159</a>
	Policy E2 Flood Risk	167326	Mayor of London	Not specified	Not specified	The approach to flood risk is generally acceptable and in line with London Plan policies however, paragraph 4.6.22 would benefit from a direct reference to London Plan policy 5.13 and the Sustainable Drainage hierarchy, which is commonly used by most London Boroughs in place of a specific policy in their own plans.					<a href="#">174</a>
	Policy E2 Flood Risk	166972	Cathedral Group	Yes	No	The policy should be amended so that it is clear that where a site is allocated for development, the sequential and exceptions tests are not required at the application stage as they will have already been addressed by the Council during the plan-making stages in accordance with paragraph 102 of the NPPF.	<p>The policy should be reworded to include reference to allocated sites for development and that on these sites the sequential and exceptions tests are not required.</p> <p>This will ensure consistency with national policy and ensure that the strategic and site specific policies have considered this matter at the plan making stage.</p> <p>The Council should be clear that the sequential and exception tests will have been applied at the plan making stage for allocated sites.</p>	188810		Nathaniel Lichfield and Partners	<a href="#">506</a>
	Policy	630863	Transport	Not	Not specified	TfL requests that the definition of employment generating					<a href="#">67</a>

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	EA(a) Local Employment Sites		for London	specified		use is confirmed as  including transport related sui generis uses similar in character to B1, B2 and  B8 as mirrored in the London Plan.					
	Policy EA(a) Local Employment Sites	167326	Mayor of London	Not specified	Not specified	Policy EA(a) Local Employment Sites (page 67) - the supporting text must clarify that this policy does not apply within designated Strategic Industrial Locations.					<a href="#">167</a>
	Policy EA(d) Home Working	537756	Mr Richard Lee	Not specified	No	<p>The vague definition of home working within this policy and the focus on negative factors can have an adverse effect on the incubation of new businesses. This approach is not inclusive or supportive of encouraging home working communities and the key environmental benefit of reducing travel to work.. .</p> <p>There needs to be some degree of support included in this policy. There are numerous benefits to the local community for having a supported and active population working from home. The streets are safer with people placed locally throughout the day, local businesses will benefit from an increase in population during peak business hours and any visitors provide additional traffic, which can have the same positive benefits of an active neighbourhood.</p> <p>The policy could be improved by including the development of spaces that can be used to counter balance any negative effects and strengthen this often isolated community. For example, a local space with meeting rooms for hire might help offset the increase in traffic, fumes, etc. By building this into the plan, there will be more likelihood that this area could become an incubator for new businesses, which would benefit the economic development of the local community overall.</p>				<a href="#">236</a>	
	Policy EA1 Economic Development	630863	Transport for London	Not specified	Not specified	<p>TfL notes proposals to create a new urban quarter at Charlton Riverside. In</p> <p>response to this, TfL requests clarification of whether any additional transport</p> <p>infrastructure is required to accommodate this growth.</p>					<a href="#">66</a>
	Policy EA1 Economic Development	634722	Crossrail	Not specified	Not specified	<p>We recognise the use of Policy EA1 to improve the quality and positioning of Woolwich town</p> <p>centre and support this. As stated in the NPPF, sustainable economic development should be</p>		634723	Stephen Harrington	GVA Grimley	<a href="#">93</a>

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						promoted in viable locations, such as Woolwich town centre.					
	Policy EA1 Economic Development	147775	Mr Brian Regan	Yes	Yes	• Should Policy EA1 make reference to the cluster of creative industries across the borough boundary at Creekside?					<a href="#">108</a>
	Policy EA1 Economic Development	148036	Ms Jenny Bates	Not specified	No	<p>We object to Policy EA1 Economic Development</p> <p>To be sound the policy needs to set out how economic development will be pursued according to the principles of Sustainable Development such that economic activity is delivered alongside and at the same time as delivering social goals and meeting environmental targets and limits.</p> <p>And the policy must also address that it misses out on support needed for sustainable economic development ie to encourage jobs and work places (including affordable rents etc) and enabling working from home in such a way to reduce the need for people to have to travel unnecessarily</p> <p>The policy must also address that it misses out on the opportunity (eg in the 4th bullet point) to support homes retrofitting (see section below on Climate Change for supporting reasoning)</p>					<a href="#">424</a>
	Policy EA1 Economic Development	148496	Mr Frank King	No	No	<p>Policies EA1 and EA2 are contradictory in that EA1 states that the aims are to increase employment opportunities and support the development of new small and medium businesses; EA2 removes approximately three square miles of industrial land, replacing it with only about one square mile of industrial land in the White Hart Triangle. The Council expect all of the Companies in the Charlton Riverside Development Area to re-locate there onto an "intensified industrial site".</p> <p>Even if it were possible to squeeze three into one in area terms, it would still leave absolutely no room for the increase in jobs in the Borough called for in EA1 and other parts of the Core Strategy.</p> <p>In addition the required "buffering" called for in EA2 would result in a considerable amount of land and even this would still lead to tensions between the Housing Elements and the Industrial sites, resulting, in due course, with the Housing Element winning the argument and the remaining Industrial areas in EA1 being shut down and gradually being taken over by housing.</p> <p>The Transport infrastructure cannot possibly cope with the</p>	<p>Instead of building so many houses at Charlton Riverside, build most of them on the White Hart Triangle instead.</p> <p>This would have two overarching advantages in that it would save all of the difficulties and expense of moving existing businesses away from Charlton and that all of the necessary transport. and facilities such as Doctors and Shops etc are already in place in Plumstead.</p> <p>The only disadvantage would be that the flats and houses with a River frontage would not be possible. Greenwich has too many of these now; it needs homes for the present population of the Borough at a reasonable rent, which it would get at the White Hart Triangle.</p> <p>There is a limit to how many expensive homes are possible in the Borough. We already have too many, besides which the extra number of cars in expensive households is unsustainable along Woolwich Road during the rush hours.</p>				<a href="#">450</a>

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						<p>amount of new housing called for in EA2. Whereas the present industries carry-out the vast majority of their transport movements during the night or in lighter traffic hours; the housing element would not, they would need to use the rush hours to go to work and return home.</p> <p>If thousands of homes are to be built anywhere, then the transport infrastructure MUST BE:IN PLACE BEFORE SUCH A DEVELOPMENT TAKES PLACE.</p> <p>In the case of the Charlton Riverside Development, there is not now, nor is there sufficient space for, the necessary transport infrastructure, nor are plans in place for the necessary infrastructure to be built.</p>					
	Policy EA1 Economic Development	167229	Ms Lucy Owen	Yes	No	Policy EA1 and para 4.2.5 refer to the development of new urban quarters at Charlton Riverside and Greenwich Peninsula West, which it is stated will see a reduction in employment land and changing employment use. There is no explanation of what this means in terms of the Borough's safeguarded wharves, which national and London Plan policy protect for waterborne freight handling uses.	Include a cross-reference to policy IM5 so that it is clear that the wharves within Charlton Riverside and Greenwich Peninsula West are safeguarded for river based cargo handling.				<a href="#">308</a>
	Policy EA1 Economic Development	537756	Mr Richard Lee	Not specified	No	<p>This policy does not put enough emphasis or clarity on developments that will benefit the current community. Just saying that the jobs will meet the needs of the local community is not clear enough language. The generic recommendations for increasing the retail, leisure and cultural offering of the area are focused on building a new environment that will only lead to unskilled, minimum wage jobs being available for the local community. This provides the formula for gentrification and is not a regeneration strategy.</p> <p>An important change to make the plan sound is to include “local community” and “local businesses” in the policy wording.</p> <p>There is an abundance of economic development being planned around retail and cultural development in London, which implies that this combination of elements will not be unique enough in its offering to increase the attraction to this specific area. As a result, this type of plan will encourage further isolation of the existing community within the ambitious efforts to attract individuals with more spending power. Unless the focus is built around the existing needs and skills of the local community there will not be high quality jobs within reach of the current residents.</p> <p>The policy should specify that the industries being developed are required to include the hire of local</p>				<a href="#">232</a>	

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						<p>employees. An effective approach to this would be to build upon prominent skills that already exist in the area by choosing a complementary industry. This can be further compounded by developing ways that the local community can get involved through apprenticeships or training schemes, or linking schools and the needs of local employers, thus creating a stronger, skilled local workforce. Additionally, the leisure-led centre will need to include programmes that are within reach of the local community in both affordability and relevance. The methods for ensuring social inclusion of the existing community need to be clearly stated throughout.</p> <p>A further proposed change is to highlight the role of Construction as an industry that would benefit the borough and help fulfil environmental and housing issues through:-</p> <ul style="list-style-type: none"><li>• Green Focus</li><li>• Refurbishment for pre-fab housing - sustainability</li><li>• Convert old housing stock to be more energy efficient</li><li>• Infrastructure exists for this type of work in the borough</li><li>• Provides local skilled work for local people</li><li>• Potential for different types of training, architecture, building,</li></ul> <p>design, craftsmanship</p>					
	Policy EA1 Economic Development	166972	Cathedral Group	Yes	Yes	Cathedral Group supports the development of a new urban quarter at Greenwich Peninsula West.		188810		Nathaniel Lichfield and Partners	<a href="#">495</a>
	Policy EA1 Economic Development	760660	Sally Miles	Not specified	Not specified	<p>CgMs welcomes the active approach taken to promoting substantial redevelopment throughout the Borough and agree that there are significant opportunities for further residential and commercial development including traditional employment, retail and leisure provision. Indeed, the strategy recognises the significant role leisure and retail facilities play within the Greenwich area.</p> <p>It is acknowledged that the authority should seek to support town centres and to promote new district centres to provide facilities for local residents.</p> <p>However, the policy framework should also enable individual proposals that may come forward during the</p>					<a href="#">372</a>

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						<p>lifetime of the Core Strategy to be determined on their own merits. It is not possible to envisage all potential retail and commercial opportunities that may come forward during the plan period. Some specific retail operators may identify specific requirements for the area which can provide valuable services to residents and can also provide significant employment opportunities more than comparable to traditional employment uses. The Plan should incorporate a criteria based policy reflecting the standard criteria contained within the NPPF to enable proposals to be considered on their own merits.</p> <p>In addition, there are a number of existing retail parks which serve the needs of the area. Existing retail parks should be identified and allocated and policy should support proposals to redevelop or enhance the facilities provided within these established retail locations.</p>					
	Policy EA1 Economic Development	760668	Joyce Lowman	Not specified	No	Re Development of the Thames. The policy is unsound because of the total disregard of the value of the Thames as a source for work, training, tourism and heritage value to Greenwich, the whole of the UK and a world wide public, whose interest was aroused through the activities of our merchants and the navy and is increasing through travel and work opportunities. There is still a real depth of expertise, skills and knowledge in the existing community. With little opportunity for the new generations to aquire the basic knowledge and interest in what is available to them as "watermen", ship constructors, pilots, merchant seamen etc. large numbers of foreign skilled workers are having to be employed in an area of increasing possibilities.	Provision of public and heritage river based facilities to enable the existing young and old community in Greenwich to understand, enjoy, learn and appreciate what an environmental asset and work source the Thames can be, particularly for Greenwich because of its very well established World Wide Maritime Heritage. Only barely recognised by the existing authorities and over exploited by residential developers, who make no contriburtion to its development and maintenance.				<a href="#">378</a>
	Policy EA2 Charlton Riverside	756861		Yes	Yes	<p>This submission is made on behalf of an occupier of Murphy’s Wharf, Day Group Ltd. Day Group Ltd operate a river served facility from the eastern half of Murphy’s Wharf which includes an aggregates conveyor fed by barge/sea going vessels, and 4 recycling operations: post-consumer glass, construction and demolition arisings, utility spoil and the manufacture of hydraulically bound materials. The recycling of utility spoil generates a percentage of waste destined for landfill which is moved by barge.</p> <p>The site is in active use and is a key part of the Day Group business and they are committed to the continued use of the Wharf. The Wharf is in an industrial area and benefits from existing on-site infrastructure. Furthermore, it is demonstrably viable for the handling of waterborne freight.</p> <p>We welcome the inclusion of paragraph 2 of draft policy EA2 which states that:</p> <p>“The new development at Charlton Riverside will require</p>		756860	Ms Kate Matthews	Firstplan	<a href="#">10</a>

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						<p>sufficient buffering from the retained Strategic Industrial Location land and the safeguarded Angerstein and Murphy’s Wharves to minimise the potential conflicts of use and interference to new residents.”</p> <p>The protection of the safeguarded wharves from surrounding land uses is consistent with National policy and the London Plan.</p> <p>Notably, London Plan Policy 7.26 states that development adjacent or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance.</p> <p>Supporting Paragraph 7.79 of the London Plan confirms that some wharves are increasingly surrounded by different land uses which do not have freight or industrial use. The challenge is to therefore minimise conflict. In terms of new development the London Plan advises that:</p> <p>“New development next to or opposite wharves should utilise the layout, use and environmental credentials of buildings to design away these potential conflicts. Appropriate highway access to wharves for commercial vehicles needs to be maintained when considering proposals for development of neighbouring sites.”</p> <p>It is therefore not just a matter of safeguarding the wharf land itself but ensuring that surrounding land uses do not prejudice its future operation.</p> <p>It is significant that Annex 5 of the Safeguarded Wharves Review March 2013, which provides site assessment sheet for the safeguarded wharves, confirms in respect of Murphy’s Wharf that:</p> <p>“Further mixed-use development is planned in the Charlton area over coming years – notably the Sainsburys distribution depot – bringing mixed-use development closer to the wharves than the existing. It will be important to ensure that this does not introduce conflicting land uses and retains appropriate HGV access to the site.”</p> <p>The operators are concerned that further mixed-use development planned in the area will bring potentially conflicting land uses closer to the wharf than existing. It is key to the long term future and operation of the wharf that both existing and future activities are not prejudiced by the introduction of potentially conflicting land uses. In accordance with London Plan requirements, it should be ensured that such uses are not located so as to prejudice the</p>					

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						<p>effective use of the safeguarded wharf and are designed to minimise potential conflicts. Furthermore, new development in the area should ensure that appropriate HGV access to the site is retained.</p> <p>It is therefore vital that the policy requires sufficient buffering from the safeguarded wharves in order for the plan to be considered sound.</p>					
	Policy EA2 Charlton Riverside	148496	Mr Frank King	No	No	<p>Respondent states that representation also relates to parts 2&amp;7 of the proposal map changes.</p> <p>Policies EA1 and EA2 are contradictory in that EA1 states that the aims are to increase employment opportunities and support the development of new small and medium businesses; EA2 removes approximately three square miles of industrial land, replacing it with only about one square mile of industrial land in the White Hart Triangle. The Council expect all of the Companies in the Charlton Riverside Development Area to re-locate there onto an "intensified industrial site".</p> <p>Even if it were possible to squeeze three into one in area terms, it would still leave absolutely no room for the increase in jobs in the Borough called for in EA1 and other parts of the Core Strategy.</p> <p>In addition the required "buffering" called for in EA2 would result in a considerable amount of land and even this would still lead to tensions between the Housing Elements and the Industrial sites, resulting, in due course, with the Housing Element winning the argument and the remaining Industrial areas in EA1 being shut down and gradually being taken over by housing.</p> <p>The Transport infrastructure cannot possibly cope with the amount of new housing called for in EA2. Whereas the present industries carry-out the vast majority of their transport movements during the night or in lighter traffic hours; the housing element would not, they would need to use the rush hours to go to work and return home.</p> <p>If thousands of homes are to be built anywhere, then the transport infrastructure MUST BE IN PLACE BEFORE SUCH A DEVELOPMENT TAKES PLACE.</p> <p>In the case of the Charlton Riverside Development, there is not now, nor is there sufficient space for, the necessary transport infrastructure, nor are plans in place for the necessary infrastructure to be built.</p>	<p>Instead of building so many houses at Charlton Riverside, build most of them on the White Hart Triangle instead.</p> <p>This would have two overarching advantages in that it would save all of the difficulties and expense of moving existing businesses away from Charlton and that all of the necessary transport. and facilities such as Doctors and Shops etc are already in place in Plumstead.</p> <p>The only disadvantage would be that the flats and houses with a River frontage would not be possible. Greenwich has too many of these now; it needs homes for the present population of the Borough at a reasonable rent, which it would get at the White Hart Triangle.</p> <p>There is a limit to how many expensive homes are possible in the Borough. We already have too many, besides which the extra number of cars in expensive households is unsustainable along Woolwich Road during the rush hours.</p>				<a href="#">452</a>
	Policy	167229	Ms	Yes	No	Policy EA2 seeks a new mixed use urban quarter and to	Remove all references to any potential release of				<a href="#">317</a>

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	EA2 Charlton Riverside		Lucy  Owen			<p>consolidate employment.</p> <p>Specific reference is made to new development requiring sufficient buffering from the safeguarded Angerstein and Murphy's wharves and this is welcomed. However, no protection is given to Riverside wharf which is not included within the Charlton Riverside SIL and, in fact, national and London Plan policy, and with no evidence base, the Council identify it for potential release in the future.Additionally no protection is given to to Charlton bargeworks which is included within Charlton Riverside SIL but no reference is made to the need for sufficient buffering.</p> <p>Riverside wharf is safeaguarded by Ministerial Direction. The recent safeguarded wharves review final recommendations - March 2013 is clear that the site is in active use and retains flexibility to meet a range of operational needs. As such the document recommends that it retains its safeguarding. London Plan policy protects safeguarded wharves for waterborne freight handling use. The re-development of safeguarded wharves for other land uses should only be accepted if the wharf is no longer viable or capable of being made viable. The Council has advanced no evidence to demonstrate the wharf is not viable and as such the Core Strategy should protect it in line with national and regional policy and all references to 'potential release' should be removed.</p> <p>Charlton bargeworks services and repairs Cory's fleet of tugs and barges and is a waterway support facility which London Plan policy 7.27 seeks to protect.</p>	Riverside wharf, afford Riverside wharf the same protection (including buffering) as Angerstein and Murphy's wharves. Include a reference requiring new development to have sufficient buffering from Charlton bargeworks				
	Policy EA2 Charlton Riverside	167326	Mayor of London	Not specified	Not specified	<p>With regard to the consolidation of the SIL at Charlton Riverside and Greenwich Peninsula West, the CS states (para 4.2.5) that "The employment land that is retained will be intensified so that there will be no net loss of employment across the waterfront area" - neither the CS nor the ELR appear to give an estimate of current jobs at this location so it is difficult to ascertain whether this CS commitment is realisable - further clarification of this should be sought. From discussions held with the Council regarding Charlton Riverside it is understood that 2,000 jobs are currently located in the area of SIL to be de-designated. GLA officers consider it to be unrealistic that these will be relocated elsewhere within the SIL. Consideration should be given to some of these businesses relocating elsewhere within the Borough, to White Hart Triangle for example. Further discussion is needed on this matter.</p> <p>The explicit reference to 'buffering' of new development</p>					<a href="#">166</a>

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						from Angerstein and Murphy's Wharf (Policy EA2) is welcome and in line with LP Policy 7.26. However, Riverside Wharf is only referred to in the supporting text (paragraph 4.2.8). The wording 'but is identified for potential release in the future' is misleading and speculative. This may be an aspiration by the Council, but the current Safeguarded Wharves Review (the Mayor's Final Recommendations are now being considered by the Secretary of State) confirms the wharf's continued safeguarding and does not include any indication of a potential future change. The safeguarded wharves review indicates the importance of HGV access to this wharf and it is difficult to see how this can be secured alongside the residential proposals in the core strategy and SPD. This should be clarified					
	Policy EA2 Charlton Riverside	502660	LXB Retail Properties PLC	Not specified	No	<p>We support the ambition to see Charlton Riverside redeveloped as a vibrant urban quarter. The policy and supporting text should address delivery issues more directly, and be more flexible about the scale of development that is likely to emerge. In particular LxB believe that, in order to be the “most appropriate” plan strategy it needs to:</p> <ul style="list-style-type: none"> <li>· accept that the scale of housing may need to increase over the longer term in order to make the appropriate contributions to public transport upgrades and to secure the anticipated land use changes</li> <li>· confirm that the Council is committed to assisting partners in delivering proposals, using CPO powers and the funds generated by the redevelopment of the area to secure change</li> <li>· indicate that it will use the masterplan process to ensure quality and appropriate phasing of</li> </ul> <p>development, giving a firmer footing to what will be (and should be) an evolving masterplan for</p> <p>the area.</p> <p>We also have detailed comments on the soundness of some elements of the policy approach to deliver 70% of the envisaged housing (3,5000) in 10 year period between 2017 and 2027 (para 3.3.15).</p> <p>Policy EA2 sets out the Council’s aspirations for the Charlton Riverside area. The draft policy states that the Charlton Riverside area will include a new mixed-use urban quarter, that there will be a reduction in the amount of out</p>		445293	Mary Davidson	WYG Planning	<a href="#">271</a>

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						<p>of town centre retail in this area and an increase in both the quantity and quality of open space.</p> <p>The supporting text confirms that there is significant low density, out of town retail to the south of the industrial area and redevelopment of this area provides the opportunity to reduce retail use and follow the sequential approach for determining suitable locations for retail units.</p> <p>We consider the retail elements of the policy unsound because of the lack of an up to date retail evidence base, and the lack of any clear delivery mechanism and conflict with the adopted SPD.</p> <p>Lack of Retail Evidence Base</p> <p>Policy EA2 states that there should be a reduction in the amount of out of town retail floorspace within the Charlton Riverside area. We understand from planning policy officers at the Royal Borough of Greenwich that this means a reduction in the amount of A1 retail floorspace. However, it is not clear from the policy whether this means as currently existing, or permitted. Planning permission has been granted within the Charlton Riverside area for a number of retail developments including the creation of a new Sainsbury’s and Marks and Spencer store to the west of Gallions Road and a new foodstore on Woolwich Road and</p> <p>there are other planned redevelopments within the areas identified in the SPD.</p> <p>The latest retail evidence base for is the 2008 Retail Study prepared by GVA. This Study does not set out the level of floorspace currently found in the Charlton Riverside area. It also does not consider any commitments / developments that have come forward in the area in the last five years. This Retail Study was produced in 2008 under guidance contained in national Planning Policy Statement 6. This guidance pre-dated both PPS4 and the NPPF, and included an assessment of need as a test for both policy making and determining applications. Moreover, the study was done before Westfield Stratford opened and this will</p> <p>have had an effect on shopping patterns in the Borough. Given the lack of information on existing and permitted retail floorspace in the Charlton Riverside area, it cannot be considered to be a sound evidence base on which to construct policy.</p> <p>Finally, as well as A1 retail floorspace, the Charlton Riverside area incorporates a significant amount of quasi-</p>					

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						<p>retail and trade counter uses, which although not classified as an A1 use, do function as a retail use. These include the Makro cash and carry warehouse, as well as the numerous trade counter uses found at Ramac Industrial Estate and Lombard Trading Estate. As such, without a comprehensive review of all retail uses that exist in the area, including planned developments and commitments, and the lack a retail study that is aligned with current nation planning policy, and without any real analysis of delivery mechanisms</p> <p>and viability, we contend that draft Policy EA2 is unsound.</p> <p>The SPD Masterplan has started to develop the detail for Policy EA2. However, there is a misplace between Policy EA2 and the adopted SPD where it refers to the requirement for a “reduction in the amount of out of town retail”. The Masterplan is currently showing more land allocated for retail, such as the Makro site. Instead, there should be consolidation of the retail and importantly recognition that the business requirements of retailers should be taken into account. In certain instances this may result in more gross floorspace, but not the overall net floorspace.</p>					
	Policy EA2 Charlton Riverside	537756	Mr  Richard  Lee	Not specified	No	<p>The policies on economic activity are unsound as they lack the sustainable development approach required by national policy. For example, they fail to provide work where people live so as to reduce travel, and fail to maximise the potential of freight transport by river by safeguarding all wharves.</p> <p>The Local Authority evidence base is weak and there has been no informed consideration of alternative approaches. The policy of new urban quarters lacks specifics, whilst it is clear that the heavy focus on new residential development will both significantly reduce designated industrial space and situate residential accommodation alongside industry.</p> <p>The policy of releasing employment land for residential development will inevitably displace existing businesses and industries. There is the risk that jobs for local people will be low paid and with poor working conditions.</p> <p>In Woolwich town centre, the evidence already shows the problems caused by this approach, with the loss of industrial land and the failure to attract new tech companies leading to serious unemployment.</p> <p>In Greenwich Peninsula, the evidence shows the failure to integrate development into the existing character, and the threatened loss of Tunnel Wharf will intensify the problem.</p>	<p>To be sound, the aspiration for employment growth needs a clear delivery plan showing how a net increase in jobs will be achieved. If there are to be quality jobs that meet the needs of local people, then policies are needed that promote training opportunities, economic diversification and the London Living Wage. These should all have been considered as an alternative option, also including green jobs and social enterprises. Policy support for local sourcing, local procurement, local shops and businesses and street/ covered markets will also help to deliver more sustainable local economic activity.</p> <p>To be sound the policy of new urban quarters should make clear reference to social, economic and green infrastructure. This could be expressed in the terms of a lifetime neighbourhood as set out in the London Plan.</p> <p>To be sound, the participation of local stakeholders, including the community, in the implementation of the policy.must be clear and deliverable.</p>				<a href="#">233</a>

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						<p>At Charlton Riverside, there is evidence that the industrial estates and independent businesses are thriving and provide opportunities for local employment and apprenticeship schemes.. The threat to Riverside Wharf undermines the potential of the river location to provide freight transportation and increased sustainability. The absence of consultation with existing businesses is at odds with what is expected of the Local Authority.</p> <p>We have raised these concerns at earlier stages in the preparation of the Core Strategy, but found the Local Authority unwilling to pursue a collaborative approach.</p>					
	Policy EA2 Charlton Riverside	628576	Mr Roy Tindle	Not specified	Not specified	<p>I am Roy Tindle, a sustainability practitioner, and I make these representations on behalf of Creekside Forum of which I am Chair. I am resident on the Woolwich Charlton border and I am a member of the Aldersgate Group, a business led sustainability lobby organisation that includes, among its membership, many major UK and multinational companies.</p> <p>Our concerns relate to Policy EA2 Charlton Riverside, supporting paragraphs 4.2.7 - 4.2.9 and Map 7 in that we do not regard that sufficient weight has been given to the considerable loss of employment nor to the equal loss of local goods and services provided within this area of Strategic Industrial Land. That the Royal Borough of Greenwich has designated the eastern area of Charlton Riverside as a creative/residential quarter without providing any evidence of space requirement by the creative industries that would utilize the are aof land in question, even if integrated with residential. We also note that an additional education unit is designated at the junction of Woolwich Road and Anchor and Hope Lane, a location with high levels of nitrogen dioxide, airborne particulate matter, ozone and other air pollutants.</p> <p>Employment.</p> <p>Charlton Riverside is an area of mixed industrial, repair and wholesaling industry that was established through it’s connection with the River Thames, though that connection does no longer exists within the Riverside area. It provides skilled and semi skilled manufacturing and repair jobs together with a variety of ethnic minority business start ups in wholesaling and catering. There are significant interactions and connections between many of the businesses that would be lost on relocation. Furthermore, there is a strong element of mainly small automotive repair industries that would lose their customer base, were they to try to relocate. This employment would be lost.</p>				<a href="#">205</a>	

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						<p>The Creative Quarter.</p> <p>This currently houses a number of predominantly small creative enterprises in both new and post industrial buildings. The later constitute the majority of available premises and add character through their industrial architectural history and quality. There are some larger scale activities such as a climbing wall, circus school and martial arts facility that occupy some of the older buildings but there remains a very much larger area of unlet floor space. The Charlton Riverside section of the Core Strategy indicates that this area will extend southwards to take up existing, flourishing commercial premises, without providing any evidence of need that would justify the loss of employment consequent upon this change.</p> <p>Air Pollution.</p> <p>The Kings College air pollution monitoring stations along the Woolwich/Blackwall Tunnel South axis show serious air pollution throughout the year. This road is heavily used by motor traffic, including diesel engined vehicles that are the primary source of nitrogen dioxide and particulate matter pollution. The Charlton Riverside proposals include a new educational facility at a major junction and opposite a soon to be built ‘flagship’ Sainsbury supermarket., vehicle journeys to which will add further to the air pollution burden. Riverside residential development have, thus far, been high density and have added considerable further private vehicle journeys. A new river crossing is projected to reduce delays in crossing from south of the Thames to the north, and vice versa, but this would not ameliorate increased air pollution brought about by large increases in vehicle numbers, in this area.</p> <p>We will continue to monitor air pollution in this area and are working with Client Earth and Clean Air London on this monitoring.</p> <p>Over the coming months we will be continuing to work in the Charlton area.</p> <p>We shall be attending the pre-inquiry meeting for the EiP.</p>					
	Policy EA2 Charlton Riverside	166972	Cathedral Group	Yes	No	We support the designation of Charlton Riverside as a Strategic Development Location and the promotion of a mixed-use urban quarter. The introduction of residential uses is crucial to promoting regeneration in this area and therefore the SIL release is very important in achieving this.	At this current time, Riverside Wharf should also be released from its safeguarded status to allow greater flexibility in options for regeneration. Opportunities for residential redevelopment, which are promoted by both the Charlton Riverside SPD and Core Strategy with Development Management	228178	Ms Diana Thomson	GVA Grimley	<a href="#">465</a>

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							<p>Policies, would be improved by the removing the designation as it allows greater flexibility in proposals for the area.</p> <p>Furthermore, the employment land which is retained should continue to be reviewed after the adoption of this document, so as to allow for further SIL release in the future, where it can be demonstrated that the protection is no longer appropriate. Further guidance should be provided where the Charlton Riverside Masterplan SPD no longer accords with the proposal map changes as a result of the amendments to the SIL release.</p>				
	Policy EA2 Charlton Riverside	495574		Not specified	Not specified	<p>The Councils decision to allocate the Charlton Riverside as a Strategic Mixed Use Development site is strongly supported.</p> <p>It is, however, submitted that whilst the ‘Westminster Industrial Estate’ remains allocated as a Strategic Industrial Location (SIL), where residential mixed use development is prohibited, the proposed Charlton Riverside Opportunity Area will not be deliverable and will subsequently fail to provide sufficient housing during the plan period.</p> <p>It is logical to start the redevelopment of an area with the sites which offer the best odds of delivery due to the higher levels of vacancies, single land ownership and sustainability. These are the sites, such as WIE, that are the most attractive to developers and investors, and offer the lowest risk. If the proposed allocation of WIE remains, the chance is lost to kick start the regeneration of the whole Charlton Riverside area. This would put in jeopardy the Borough Council’s proposed spatial strategy, its ability to meet its housing targets, and thwart the productive reuse of a substantial area of land.</p> <p>Furthermore, in order to preserve the heritage of the area (and buildings that the Council</p>		495566	Mr Thomas Hatch		<a href="#">361</a>

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						<p>consider are worthy of retention) it is essential that high value uses are introduced such as</p> <p>residential to provide sufficient viability required to kick start regeneration of the Opportunity</p> <p>Area. Given the sites peripheral location from the heart of the SDA, buffered by the Maryon to</p> <p>Thames Barrier linear park, and its close proximity to Woolwich town centre, plus improved</p> <p>education to the south and excellent public transport links, it is sensible for the Council to focus the start of the regeneration on an area most attractive to developers.</p> <p>Capita Symonds has talked to housing developers in preparation of these representations.</p> <p>Whilst there is interest in this site, a clear message has been on reticence to invest in the SDA whilst the number of commercial interests remain. This is not the case on much of the WIE. The development of WIE can be phased to retain for the longer term that part of the estate in business use.</p> <p>There is no evidence that Greenwich Council has taken these commercial delivery aspects into consideration, and therefore the proposal to designate WIE as a SIL is unsound.</p> <p>In considering the appropriateness of a site for development the NPPF sets out that sites</p> <p>identified for residential or mixed use re-development can only be considered deliverable if they are 1) Suitable for redevelopment; 2) Available now; and 3) Achievable within the Plan Period. It is submitted that the Westminster Industrial Estate is the only site within the opportunity area that can fulfil these criteria:</p> <p>Suitability</p> <p>The WIE is considered highly suitable for residential led mixed use development for the</p> <p>following reasons: Context and Existing Buildings – The Estate is located at the far eastern side of the Opportunity Area.</p> <p>The WIE enjoys both parkland frontage and river/ barrier</p>					

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						<p>views. It also fronts the Thames Barrier Tourist Attraction and adjoins a college/ primary school educational hub. The WIE also contains a number of period buildings which, while largely derelict, are of architectural interest (as acknowledged by the Council).</p> <p>On this basis, the WIE is considered to be the most suitable site in the Opportunity Area for mixed use development. The other sites can not take advantage of park land frontage (green</p> <p>links) or existing buildings. Consequently they would require significant, levels of potentially</p> <p>unviable investment by land owners to up-grade the urban environment before mixed use</p> <p>development could occur. (See Enclosed Context Plan).</p> <p>The WIE is suitably located within walking distance of from Charlton and Woolwich Dockyard</p> <p>train stations (15 minutes) and Woolwich town centre, which sustainable access to Central</p> <p>London for commuters. Woolwich Road is also well served by bus routes 161, 177, 180, 472 and N1 providing access (Every 2-3 minutes) to Woolwich Town Centre in about 5 minutes and</p> <p>Woolwich Town Centre or North Greenwich in 15 minutes.</p> <p>Whilst the existing PTAL varies across the site from fair to good, mixed use re-development of</p> <p>the site would provide funding for Planned Improvement works (i.e. Cross Rail/ Thames Clipper/ DLR/ Waterfront Transit) which would in turn significantly improve the sites PTAL. Traffic generated by mixed use development would have a lesser impact than that of industrial</p> <p>intensification. Mixed use development would also improve pedestrian permeability and</p> <p>increase connectivity with the Thames Barrier Visitors Centre, Maryon Park and the Thames</p> <p>Pathway (Thames Special Policy Area).</p> <p>The period buildings to the north east of the site are largely vacant and/or derelict and in need of regeneration. Most of</p>					

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						<p>these units are in such poor condition that they are no longer suitable for occupation. It has proven not to be financially viable to refurbish or re-develop the buildings for employment use.</p> <p>The units which are available are no longer suitable for modern day employment use and as a</p> <p>consequence remain largely vacant. These buildings do however have desirable character and</p> <p>are suitable for conversion. On this basis, it is considered that these buildings and building 219, which fronts the parkland, have short/ medium term potential for residential led mixed use</p> <p>development including creative industries, leisure, community uses and improved open space</p> <p>(6.9 Acres).</p> <p>In the longer term, buildings 208/ 216 - 218, which would be retained for employment in the short term, have potential for mixed use redevelopment. An indicative concept plan is enclosed within this submission. The plan demonstrates that the site could be appropriately configured to separate mixed use and industrial areas. None of the other sites in the Opportunity Area have buildings of merit suitable for conversion. The level of investment required on these sites for demolition and new build would be significantly higher which is likely to be non-viable at current relative land values.</p> <p>CIS’s concept is in general accordance with the Adopted Charlton Riverside Master Plan SPD</p> <p>(2012). If the WIE is retained as a SIL then mixed use development of the site would be</p> <p>precluded and the strategic objectives of the master plan would not be achievable. The Master</p> <p>Plan exercise found the WIE to be highly suitable for residential and mixed use development</p> <p>including creative industries.</p> <p>Availability</p> <p>The WIE site is available for re-development in the short to medium term and can be undertaken in a phased approach.</p>					

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						<p>The period properties are largely vacant and the leases of other buildings are coming to an end or break period. CIS has demonstrated their commitment to re-develop the site for residential led mixed use development on numerous occasions to the Council and through the plan making process. CIS has also instructed Capita Symonds Real Estate to soft market test the site to procure a development partner.</p> <p>Other land within the Opportunity Area which has been identified for residential development in</p> <p>the Adopted Master Plan I, in particular the central cluster, is known consist of a large number</p> <p>of separate freehold (5+) and leasehold interests and higher value retail uses. It is therefore</p> <p>highly unlikely that these sites will become available for residential development during the plan period.</p> <p>The sites which are presently available in the short/ medium term are unlikely to come forward</p> <p>for viability reasons, given that any residential dwellings built would be adjacent to industrial</p> <p>uses providing a poor quality urban environment. A recent planning application and subsequent</p> <p>appeal at Ashleigh Commercial Estate freeholders confirms the intentions of landowners here to re-develop their land for employment purposes only.</p> <p>Achievable</p> <p>Capita Symonds has undertaken financial viability assessments which indicate that residential</p> <p>led redevelopment of the site would be financially viable. Soft market testing, also undertaken by Capita Symonds, to procure a development partner has generated interest by a number of</p> <p>volume house builders, developers and specialist regenerations companies. Respondents noted that the WIE was the only site with reasonable prospects of being re-developed for residential led redevelopment. On this basis, the residential led re-development of the site is considered to be achievable in the short to medium term and within the Core Strategy Plan Period.</p>					

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						<p>Other sites within the Opportunity Area are not considered to be achievable residential sites</p> <p>within the plan period due to the relative higher value of employment/ trade retail land against</p> <p>that of residential led development land. These areas do not benefit from park land frontage or</p> <p>have existing desirable buildings capable of conversion. The cost of residential development</p> <p>here is therefore higher and the achievable values lower, thus rendering re-development</p> <p>unviable. Furthermore if individual sites come forward, as would be expected given the multiple</p> <p>ownerships, then achievable residential values will be constrained by adjacent industrial uses.</p> <p>This assessment is confirmed by the decision of Ashleigh Commercial Estate Freeholders to</p> <p>submit a planning application and a subsequent appeal (APP/E5330/A/12/2188179), to deliver</p> <p>new speculative industrial units within the central cluster of the Opportunity Area. This is where the Council expects most residential development to occur as per their decision to release it from the SIL and the uses proposed in the Adopted Master Plan SPD. If this appeal, currently under consideration, is allowed then employment development is likely to preclude residential development on the adjacent sites. Even if the appeal is dismissed, the intent to redevelop for employment use only remains evident.</p> <p>The Berkeley Group redevelopment of Woolwich Arsenal demonstrates how a blend of</p> <p>residential and commercial uses can be achieved to the highest standard and in a manner which is attractive to potential residents and protects residential amenity, and retains important</p> <p>buildings in productive use.</p>					
	Policy EA2 Charlton	760589	Bill Elson	No	No	Our concerns centre on Policy EA2 Charlton Riverside, supporting paragraphs 4.2.7 - 4.2.9 and Map 7. In that there has been a lack of consultation we regard these matters as					<a href="#">358</a>

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	Riverside					<p>not being legally compliant. In that there is no objective assessment of existing businesses in the Charlton Riverside area there is no credible evidence base therefore we regard these matters as neither positively prepared nor justified. In that there is neither any realistic basis set out as to how employment is to be “consolidated to maximise the use of land” nor as to how “sufficient buffering” is to be provided we do not regard these matters as effective. Not only is the “poor environmental quality” (para 4.2.8) overstated but much of what can be so described is as a result of the failings of RB Greenwich (RBG) as landowner, Highway Authority or Local Planning Authority.</p> <p>The land currently designated as a Strategic Industrial Location should remain so.</p> <p>Who we are</p> <p>Originally formed in the 1970s as the Docklands Forum, we changed our name in 2000. Until about five years ago we were grant funded, but we are now a wholly voluntary organisation.</p> <p>Our Involvement</p> <p>In 2012 we became aware that RBG were consulting on a purported Supplementary Planning Document in relation to Charlton Riverside, despite not having an adopted core strategy for the SPD to be in conformity with. We submitted objections to the SPD, but along with three other purported SPDs it was nodded through unchanged at a RBG Cabinet meeting.</p> <p>Subsequently a local group asked Just Space to become involved. We then assisted students from University College London in surveying businesses in the Charlton Riverside area. We attach a copy of Charlton Riverside: An alternative plan as an annex to this representation. We have encouraged businesses to make objections themselves and include details of who they are, what they make or do in order to help the Inspector understand the nature of commerce in the area. We also distributed some template forms for those businesses that might otherwise find it difficult to make representations.</p> <p>Finance</p> <p>We are not clear that RBG have taken into account the Government’s changes to Business Rates and the potentially deleterious effect on the Borough’s finances of such a reduction in employment land.</p>					

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						<p>Equalities</p> <p>We are not clear that RBG have shown proper regard to their equalities duties despite the exhortation, contained in Policy SPG 8 Wholesale Markets in the Mayor of London’s Land for Industry and Transport Supplementary Planning Guidance, that:</p> <p>In implementing London Plan policies, the Mayor will and TfL, boroughs and others partners should:</p> <p>(i) ensure that London has an efficient, modern wholesale market function to meet its changing requirements including the needs of Black, Asian and minority ethnic (BAME) communities, the restaurant sector and demand for ‘whole-foods’;</p> <p>The ‘Ethnic Food’ offer in Charlton includes West African, Peruvian, Indian, Chinese and Vietnamese / Indochinese outlets. The south-east Asian suppliers tend to stock food products from many countries including Japan, Thailand and Malaya as well as fresh ‘oriental’ produce grown or raised in the UK. The majority of the turnover of these is wholesale and restaurant supply. Unlike many ‘western’ wholesalers these businesses tend to also welcome the individual shopper buying a basket of goods as much as the retailer / restaurateur buying a pallet. It may be that this lack of clear distinction between wholesale and retail has caused some confusion among those considering the future of the area.</p> <p>Automotive Repairs</p> <p>The area contains a wide variety of businesses maintaining and repairing cars, lorries and buses. There are a variety of specialist car businesses including bodywork, paint, gearbox, electrical, tyre &amp; wheel balancing, car wash / valet, audio systems and a Land Rover.</p> <p>Manufacturing</p> <p>There is a cluster of Lift design, manufacture, installation and maintenance businesses at Charlton. As with so much of Greater London’s remaining manufacturing industry these companies survive by maintaining a service industry attitude to their customers – responding quickly and reliably when needed. Many of these companies use neighbouring fabricators and component suppliers.</p> <p>Prototyping</p>					

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						<p>One of the more unique businesses makes prototypes to order, operating lathes manually. We understand that this company employs locally recruited apprentices</p> <p>Stone Foundries</p> <p>One of the largest businesses that would be affected by these proposals, the following three paragraphs are from their website.</p> <p>Stone Foundries is recognised by the aerospace and defence industries as a world class UK producer of high integrity magnesium castings and aluminium castings. Best known as a primary supplier of parts for helicopters, commercial and military aircraft, jet engines and motor racing, our client profile includes Agusta Westland, Airbus, BAE Systems, MBDA and Rolls-Royce, to name but a few.</p> <p>Stone Foundries can trace its origins back to 1830 when founder, Josiah Stone, set up his business on the Thames in south-east London to cast copper nails for the shipbuilding industry nearby in Greenwich. The product range expanded to include rivets and other engineering supplies. These products were displayed at the International Exhibition in London in 1862 (link to picture). The marine theme continued in later years as the company became a specialist in casting large copper propellers.</p> <p>As the aerospace industry developed during the early 1900's, the focus of the business moved towards magnesium and aluminium light alloy castings to supply the needs of this rapidly growing industry. In 1939, a new plant was established in Charlton, south-east London, close to the Thames Barrier, and this plant continues to produce aerospace castings today.</p>					
	Policy EA2 Charlton Riverside	760702	Royal Mail	No	No	<p>We note that the draft documents identify Greenwich &amp; Charlton Delivery Office as forming part of the draft Charlton Riverside Strategic Development Location (Map 2). Draft Core Strategy Policy EA2 states that "the area will include a new mixed use urban quarter" and the development of 3,000 - 5,000 new homes is sought.</p> <p>We also note that Woolwich DO falls within the boundary of draft Thamesmead Strategic Development Location (Map 4). The draft Core Strategy promotes mixed use development across this area.</p> <p>Royal Mail object to these allocations unless Royal Mail’s existing operations on these sites are relocated/re-provided</p>	<p>In terms of the former, it would be essential that any new facilities are provided prior to the demolition of those existing, to ensure Royal Mail’s continuity of service. This will ensure that Royal Mail’s operations will not be prejudiced and that they can continue to comply with their statutory duty to maintain a ‘universal service’ for the UK pursuant to the Postal Services Act 2000.</p> <p>In order for the sites to be brought forward for redevelopment, relocation will need to be viable for Royal Mail. There will need to be a commercial attractiveness that would incentivise the business to relocate the operations.</p>	760699	Claire Davies	DTZ	<a href="#">395</a>

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						at suitable alternative sites or retained as part of the proposed schemes.	<p>Should Greenwich &amp; Charlton Delivery Office and Woolwich Delivery Office be retained as part of the proposed schemes, it would be essential that any new development adjacent to these sites is compatible with Royal Mail's existing operations. This is necessary to ensure Royal Mail's continuity of service and to preserve the amenity of those occupying any neighbouring new development.</p> <p>Royal Mail will not accept responsibility for remedying any noise, transport and/or amenity complaints from those occupying any new neighbouring development which may arise as a result of activity within Greenwich &amp; Charlton Delivery Office and Woolwich Delivery Office. In the event of any such future complaints, any retrospective mitigation measures will need to be delivered within the neighbouring development site(s) and at the expenses of the developers (or future landowners).</p>				
	Policy EA2 Charlton Riverside	760702	Royal Mail	No	No	<p>Map 7</p> <p>Royal Mail's Charlton Local Depot is surrounded by retail warehouse uses along Bugsby's Way and industrial uses are located in the wider area.</p> <p>We note that these premises fall within the draft Charlton Riverside Strategic Industrial Location (Map 7). Draft Core Strategy Policy EA4 states that this area will be protected for continual industrial use.</p> <p>We are aware that the Charlton Riverside Masterplan SPD (2012), which was adopted in April 2012, allocates Charlton Local Depot for continued industrial/ employment use and the land to the south of the site, south of Bugsby's Way for retail use. The draft documents currently on consultation therefore place a more restrictive draft allocation for continued industrial use on this Royal Mail site, despite its location on Bugsby's Way which is characterised by retail warehouse uses.</p> <p>Royal Mail strongly object to the allocation of Charlton Local Depot for continual industrial use in the draft documents.</p>	<p>We formally request that Charlton Local Depot is removed from this allocation and that it instead falls within the surrounding allocation for Charlton Riverside Strategic Development Location (Map 2), where draft Policy EA2 promotes the development of a new mixed use urban quarter and 3,000 - 5,000 new homes.</p> <p>We formally request that the wording of Policy EA2 is amended as follows to better reflect the aspirations of the adopted Charlton Riverside Masterplan SPD (2012) and the characteristics of the Royal Mail site and surrounding retail warehouse uses:</p> <p>"Land at Charlton Riverside is allocated as a Strategic Development Location (as shown on the Proposals Map) and will include a new mixed-use urban quarter. Employment will be consolidated to maximise the use of land whilst maintaining employment levels in the waterfront area. Within the boundary of this Strategic Development Location, retail uses will only be appropriate to the north and south of Bugsby's Way.</p> <p>Out of town centre retail development will be resisted in the remainder of this area and the quantity and quality of open space will be increased".</p>	760699	Claire Davies	DTZ	<a href="#">398</a>

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							<p>Again, it will be essential that Royal Mail’s existing operations on the site are relocated/re-provided at suitable alternative sites. It would be essential that any new facilities are provided prior to the demolition of those existing, to ensure Royal Mail’s continuity of service. This will ensure that Royal Mail’s operations will not be prejudiced and that they can continue to comply with their statutory duty to maintain a ‘universal service’ for the UK pursuant to the Postal Services Act 2000.</p> <p>In order for the site to be brought forward for redevelopment, relocation will need to be viable for Royal Mail. There will need to be a commercial attractiveness that would incentivise the business to relocate the operations.</p>				
	Policy EA2 Charlton Riverside	762062	Mr  Nicholas  Elson	No	No	<p>The proposal is not legally compliant due to the lack of consultation, and the plans are not sound due to not being positively prepared, justified or effective. This is because of the lack of any objective assessment of businesses in Charlton meaning there is no credible evidence on which to base the policies. They are also not consistent with the London Policies.</p> <p>Our business was established in 2000, and employs approximately 4 people, along with our other company Page Pipeline Ltd who also employs another 4 persons. 3 of these employees use public transport such as the tube then bus, as well as the local Charlton train station to commute every day.</p> <p>We always use routes into London through the Blackwall tunnel, as a majority of our work is London central based. This makes our location pivotal in our role of being able to provide same day services, which are reactive to any issues that should arise. If we were to relocate further a field this would impact on our travel times, fuel and business tremendously. We did previously look at alternative workshops further out about 5 years ago, but none suited compared to our current location, so relocating was not an option and this would still be the same today.</p> <p>It would also affect the current employees travel time to work, potentially we could risk losing these employees as some currently travel from the Essex/Barking area to us in Charlton.</p>				<a href="#">441</a>	
	Policy EA3 Greenwic	630863	Transport for London	Not specified	Not specified	TfL note that there are numerous citations of the proposed cruise liner terminal					<a href="#">63</a>

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	h Peninsula West					<p>as part of the Enderby’s Wharf scheme. It is stated in the document that this</p> <p>will be delivered by 2013, however TfL encourages the revision of this date</p> <p>given this appears unlikely. Given the reliance of the Core Strategy upon this</p> <p>facility, TfL requests RB Greenwich confirms appropriate timescales for its</p> <p>construction and operation.</p> <p>TfL wishes to note that both Tunnel Wharf and Brewery Wharf are safeguarded</p> <p>by the Safeguarded Wharves on the River Thames: London Plan</p> <p>Implementation Report (2005).</p>					
	Policy EA3 Greenwich Peninsula West	758834	Scotia Gas Networks	Not specified	Not specified	<p>Emerging Policy EA3 (Greenwich Peninsula West) provides specific policy for economic development at Greenwich Peninsula West:</p> <p>“A new urban quarter will be created at Greenwich Peninsula West as shown on the</p> <p>Proposals Map as a Strategic Development Location (SDL). The SDL will include a range</p> <p>of uses such as residential, and commercial uses, as well as the Victoria Deep Water</p> <p>Terminal. A masterplan SPD has been prepared for Greenwich Peninsula West to guide</p> <p>development in this area.”</p> <p>The gas holder site falls within this emerging site wide allocation which proposes a new high quality mixed use urban quarter comprising a cruise liner terminal and associated leisure, hotel and enterprise space in addition to new housing. This Strategic Development Location would provide a more effective use of the land and would accompany the redevelopment that is taking place on the rest of the Peninsula.</p> <p>The development aspirations at this location are highly supported in principal by SGN in respect to new housing</p>		758833	Sophia Waugh	Assistant Planner  Quod	<a href="#">120</a>

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						<p>and commercial development, albeit this policy is of a generic nature. Such uses at the gasholder site would remove the HSE PADHI zone limitation on surrounding development opportunities and therefore have a cumulative effect on development capacity in an important borough location.</p> <p>A Masterplan SPD has been prepared for Greenwich Peninsula West to guide development on the remainder of the Strategic Development Location which was adopted April 2012. This provides additional detail on how the approach within the emerging Core Strategy can be implemented and can be used as a material consideration when assessing planning applications.</p> <p>Whilst not subject to the current draft Core Strategy and Development Management Policies Consultation and given the interrelationship between both documents, the land adjacent to the existing gasholder site has been identified as being potentially suitable for education, leisure and open space uses. It therefore forms some context of Greenwich’s thinking for this site.</p> <p>SGN were not in a position to engage within the Masterplan Consultation process at that time, albeit the site should be considered as, in effect, white land which has the capacity to accommodate a wide range of uses. Any blanket allocation for educational use would not be seen as appropriate.</p> <p>The Masterplan does not take account of the need to incentivise and fund decommissioning and fails to give regard to the costs associated with remediation alongside dismantling of associated infrastructure and the need to bring forward future land uses to fund this process. Indeed, timely resolution of the gasholder issue is important to overall phasing of the south west of the Peninsular.</p> <p>In respect of Hazardous Substances and Installations, the adopted London Plan at paragraph 5.95 confirms that</p> <p>“In a city where space is increasingly at a premium, it is essential that wherever</p> <p>practicable, brownfield sites – including those affected by contamination – should be</p> <p>recycled into new uses.”</p> <p>London Plan Policy 5.22 Hazardous Substances and Installations confirms that in preparing LDFs, boroughs</p>					

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						<p>should:</p> <p>a) identify the locations of major hazards (including pipelines carrying hazardous substances)</p> <p>b) consult and give due weight to advice from the Health and Safety Executive to ensure that land use allocations take account of proximity to major hazards</p> <p>c) consult utilities to ensure that the timing of decommissioning and the implications for development are reflected in proposals</p> <p>d) ensure that land use allocations for hazardous installations take account of the need to incentivise and fund decommissioning.</p> <p>London Plan Policy 5.22 is clear in terms of its requirements. We do not consider that Policy 5.22 has been addressed as part of the emerging Core Strategy and Development Management Policies Document which allocates the gasholder site within a wider development plot, and this should therefore be rectified accordingly.</p> <p>The adopted National Planning Policy Framework (NPPF), published in March 2012, provides further support to London Plan policies. It recognises the clear need for viable developments to come forward to avoid stymieing brownfield development sites.</p> <p>In particular, Paragraph 173 states that:</p> <p>“To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be</p>					

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						<p>deliverable.”</p> <p>It is essential that the site is allocated for uses of sufficient value to ensure that the redevelopment of the site is viable, taking into account the significant abnormal costs of these enabling works. There are substantial costs related to the decommissioning of the gasholder, dismantling the associated infrastructure and decontamination of the site.</p> <p>In light of the above, we consider that emerging Policy EA3 which currently allocates the gasholder site within a wider site allocation does not provide enough consideration of the key aspects considered pertinent to the redevelopment of a hazardous installation and the East Greenwich Gas Holder Site itself.</p> <p>As such we propose that a new policy is included in the draft Core Strategy and Development Management Policies specifically, to recognise adopted London Plan policy 5.22.</p> <p>g) New Royal Borough of Greenwich Policy – Hazardous Substances and Installations</p> <p>We propose that the Royal Borough of Greenwich include the following policy in its draft Core Strategy and Development Management Policies to reflect London Plan policy 5.22, as proposed below:-</p> <p>Policy Hazardous Installations</p> <p>Hazardous installations will be identified in the Local Plan. The Council will take into</p> <p>account the need to incentivise and fund decommissioning as part of any</p> <p>redevelopment proposal</p> <p>Zoning of the site as “white land” alongside the placing of the above policy into the Local Plan will ensure that the site is not stymied from future development potential, as is currently the case.</p>					
	Policy EA3 Greenwich Peninsula West	148496	Mr Frank King	No	No	<p>Respondent also states that the representation relates to propsals map changes 1,3 &amp; 8.</p> <p>It concerns me that the land on which the vast majority of these new developments are to take place on were, and as far as I know still are, contaminated. Building residential properties or high density industrial developments on contaminated land must be contrary to both National Policy</p>	Anything could be built on the Peninsula which has a low population density and does not include any food distribution or manufacture. I would suggest that the Peninsula would be the perfect location for the new and high tech developments referred to in the Core Strategy.				<a href="#">453</a>

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						<p>Guidelines and Health and Safety Laws.</p> <p>I am sure that low density industrial development would be both allowable and desirable, but not residential.</p> <p>I also firmly believe that all Riverfront land should be used for jobs because in the next 20 to 30 years the River will, from necessity, be needed for transportation when the adjacent roads are impassable and to build more would be virtually impossible.</p>					
	Policy EA3 Greenwich Peninsula West	166972	Cathedral Group	Yes	No	<p>Cathedral Group raises concerns regarding the defined boundary for the Strategic Industrial Location at Greenwich Peninsula West, as shown on proposals map 8.</p> <p>There is no clear understanding how the boundary has been defined and there is no detail within the Employment Land Review (2012) to justify the precise location of the boundaries. The SIL overlaps with the defined Strategic Development Location. However, there does not appear to be a clear case for why the boundary has been drawn in the way it has. This results in three points of significant concern:</p> <p>1. There are two warehouses located to the south of the ‘Primrose Wharf’ label: a short square northern warehouse and a long rectangular southern warehouse. The northern warehouse should be included within the Strategic Industrial Location designation – so that it is consistent with the ‘flipped’ safeguarded Tunnel wharf arrangement (discussed elsewhere in the representations). However, the southern warehouse must be excluded. We have had a number of discussions with the GLA and the PLA over the past 9 months with regards to the revised Safeguarded Wharf directions. This arrangement was agreed with both parties and through representations to the Safeguarded Wharf review.</p> <p>2. The boundary as shown results in a restriction in access to the Strategic Development Location area across Morden Wharf. As currently shown, there is no access from Tunnel Avenue into the SDL area. It appears that the Council envisages a primary access through the Enderby Wharf site. This is not logical given that the roads will be smaller and routed through residential and employment areas. It is more sensible to create a good access from Tunnel Avenue i.e. in order to ensure good accessibility to and permeability through the site.</p> <p>3. In addition to the inclusion of the southern warehouse into the SIL discussed in point 1 above, there is an area to</p>	The boundary of the SIL needs to be amended.The proposed boundary accompanies this representation.	188810		Nathaniel Lichfield and Partners	<a href="#">487</a>

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						<p>the east of the southern warehouse (including Thames Bank House) that should also be excluded from the SIL defined area. Thames Bank House is currently vacant and there are no other buildings on this land used for employment purposes. This land would be more effectively used as part of the SDL and the mixed use development. This is not to say that employment generating will not come forward as part of the mixed use development in this location. Indeed, it is proposed that the Morden Wharf proposals will include employment generating uses but it is necessary to allow flexibility in designing and delivering the Morden Wharf scheme.</p> <p>It is important to note that the RBG adopted Masterplan provides this flexibility- and indeed encourages it through its vision document.</p> <p>This additional SDL land is equivalent to 2ha. The Employment Land Review (2012) states that a total of 41.4-42.4ha has been identified for release across the Borough compared with the 50ha provided for in the GLA’s Land for Industry and Transport SPG. The proposed additional release does not result in a material change to the level of identified release and will continue to provide flexibility for RBG should additional land be identified during the Plan period. Further it also provides greater comfort to the Borough that the Greenwich Peninsula West proposals can be delivered in this area.</p> <p>Cathedral Group agrees with the delineation of the SIL in the area immediately to the west of the Alcatel factory site. There are opportunities for consolidation of the Alcatel factory to make the employment floor space more efficient which will meet the needs of the company as it continues to strengthen its presence in Greenwich. The consolidated land provides for a release of land for alternative uses as part of the SDL. This is fully supported.</p>					
	Policy EA3 Greenwich Peninsula West	167229	Ms Lucy Owen	Yes	No	Policy EA3 makes reference to a new urban quarter being created which will include a range of uses. Specific reference is made to Victoria Deep Water terminal which it would appear the Council is seeking to retain however, this is not explicitly stated. For example, in relation to policy EA2, the reference is safeguarded Angerstein and Murphy's wharves, but a similar safeguarded reference is not made in policy EA3 in relation to Victoria Deep Water Terminal	<p>The policy and supporting text should be amended to make them compliant with national and London Plan policy. In particular specific reference should be made to the safeguarded status of Victoria Deep Water Terminal and Tunnel Wharf. It should be made clear that these wharves are protected for waterborne freight handling. Issues relating to juxtaposition should also be addressed. Specific protection should also be given to Bay Wharf - waterway support infrastructure.</p> <p>Victoria Deep Water Terminal is safeguarded by Ministerial Direction and the Safeguarded Wharves</p>				<a href="#">321</a>

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							<p>Review Final Recommendation — March 2013 recommends that its safeguarding is retained. It states "the site is in active use, within an industrial area and retains flexibility to meet a range of operational needs."</p> <p>It would therefore be in accordance with National and London Plan policy to refer to the safeguarded status of Victoria Deep Water Terminal. Additionally, and following the approach set out in policy EA2 it would also be appropriate for policy EA3 to make reference to new development requiring sufficient buffering from the safeguarded wharf.</p> <p>No protection is given to Tunnel Wharf (formerly Tunnel Glucose) the current and proposed amended boundary of which, as set out in the Safeguarded Wharves Review Final Recommendation — March 2013, are both located within the Greenwich Peninsula West Strategic Development Location. The Core Strategy advises at paragraph 4.2.12 that Tunnel Wharf has been identified by Royal Greenwich for potential release for redevelopment. It is questioned on what evidence and in compliance with which policies the Council identifies Tunnel Wharf for release. There is an extant Direction relating to the current boundary of Tunnel Wharf and National and London Plan policy seeks the safeguarding of wharves and their protection for waterborne freight handling use. The London Plan is clear that the re-development of safeguarded wharves for other land uses should only be accepted if the wharf is no longer viable or capable of being made viable. The Council has advanced no evidence to demonstrate that the wharf is not viable and as such the Core Strategy should protect it in line with regional and national policy and all references to potential release for redevelopment should be removed.</p> <p>Additionally, Bay Wharf is located within the Greenwich Peninsula West Strategic Development Location. No reference is made to this site and the important role that it is due to play in boat repair/maintenance. In line with London Plan policy it should be made clear that as waterway support infrastructure, it is protected from alternative development and issues relating to juxtaposition should also be addressed</p>				

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	Policy EA3 Greenwich Peninsula West	167326	Mayor of London	Not specified	Not specified	<p>The aspiration in the core strategy to reclassify the SIL at Greenwich Riverside West towards an Industrial Business Park (IBP) is supported as a general principle. However, given the existence of safeguarded wharves and the nature of their operations it is suggested that this SIL is more appropriately classified as a combined "Preferred Industrial Location (PIL)/IBP" in recognition of the varied functions within it, as well as the Council's aspirations. Classification of Charlton Riverside West as PIL is supported in recognition of the wharf functions within it. Classification of Charlton Riverside East as an Industrial Business Park is supported in principle subject to the detail being carried through appropriately in a revision to the adopted SPD. However, the submitted SPD (April 2012) suggests that this IBP will be a mixed creative industry / residential quarter. Residential use in an IBP is not acceptable in terms of LP policy 2.17 (SIL). Further discussion is needed on this and particularly whether the SPD is to be amended.</p> <p>The reference to Victoria Deep Water Terminal in Policy EA3 should describe the Terminal as a safeguarded wharf. As with Riverside Wharf it should also be clarified that Tunnel Wharf has been confirmed for continued safeguarding in the current Safeguarded Wharves Review (the Mayor's Final Recommendations are now being considered by the Secretary of State) and does not include any indication of a potential future change.</p>				<a href="#">165</a>	
	Policy EA3 Greenwich Peninsula West	537756	Mr Richard Lee	Not specified	No	<p>The policies on economic activity are unsound as they lack the sustainable development approach required by national policy. For example, they fail to provide work where people live so as to reduce travel, and fail to maximise the potential of freight transport by river by safeguarding all wharves.</p> <p>The Local Authority evidence base is weak and there has been no informed consideration of alternative approaches. The policy of new urban quarters lacks specifics, whilst it is clear that the heavy focus on new residential development will both significantly reduce designated industrial space and situate residential accommodation alongside industry.</p> <p>The policy of releasing employment land for residential development will inevitably displace existing businesses and industries. There is the risk that jobs for local people will be low paid and with poor working conditions.</p> <p>In Woolwich town centre, the evidence already shows the problems caused by this approach, with the loss of industrial land and the failure to attract new tech companies leading to serious unemployment.</p>	<p>To be sound, the aspiration for employment growth needs a clear delivery plan showing how a net increase in jobs will be achieved. If there are to be quality jobs that meet the needs of local people, then policies are needed that promote training opportunities, economic diversification and the London Living Wage. These should all have been considered as an alternative option, also including green jobs and social enterprises. Policy support for local sourcing, local procurement, local shops and businesses and street/ covered markets will also help to deliver more sustainable local economic activity.</p> <p>To be sound the policy of new urban quarters should make clear reference to social, economic and green infrastructure. This could be expressed in the terms of a lifetime neighbourhood as set out in the London Plan.</p> <p>To be sound, the participation of local stakeholders, including the community, in the implementation of the policy must be clear and</p>			<a href="#">234</a>	

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						<p>In Greenwich Peninsula, the evidence shows the failure to integrate development into the existing character, and the threatened loss of Tunnel Wharf will intensify the problem.</p> <p>At Charlton Riverside, there is evidence that the industrial estates and independent businesses are thriving and provide opportunities for local employment and apprenticeship schemes.. The threat to Riverside Wharf undermines the potential of the river location to provide freight transportation and increased sustainability. The absence of consultation with existing businesses is at odds with what is expected of the Local Authority.</p> <p>We have raised these concerns at earlier stages in the preparation of the Core Strategy, but found the Local Authority unwilling to pursue a collaborative approach.</p>	deliverable.				
	Policy EA3 Greenwich Peninsula West	166972	Cathedral Group	Yes	Yes	Cathedral Group overwhelmingly supports the proposals for a new urban quarter at Greenwich Peninsula West. This includes the designation of a Strategic Development Location for residential and commercial uses. It is noted however, that Cathedral Group objects to the defined boundary of the Strategic Industrial Location. This is covered in detail on our representations to Policy EA4 and the related Proposals Map 8.		188810		Nathaniel Lichfield and Partners	<a href="#">496</a>
	Policy EA3 Greenwich Peninsula West	501281		Yes	No	<p>Draft Policy EA3 provides guidance for how the Greenwich Peninsula West Strategic Development Location is intended to come forward as a new urban quarter. We welcome the Council'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 and commercial uses and those set out in the Greenwich Peninsula West Masterplan SPD.</p> <p>However, 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 lacks the necessary flexibility to respond to requirements and changes in the market in this regard.</p> <p>There is also significant uncertainty with regard to the viability and deliverability of the multi-use sports, leisure and education complex identified as a potential use for the northern part of the Greenwich Peninsula West area in the Greenwich Peninsula West masterplan SPD (GPWM). As the land owner of the area of the site where the proposal is located, there have been no viable proposals made to the College to develop the site for this use. Policy EA3 therefore lacks the required emphasis on the need for flexibility should multi-use arena prove unviable or</p>	<p>As set out in section 5 and 6, the Core Strategy lack flexibility with regard to Policy EA3 and is therefore not "effective". To enable the Core Strategy to pass the NPPF test of "soundness", in terms of being "effective" the wording of Policy EA3 should be amended to create greater flexibility to allow for changes in circumstances, and take into account the fact that the multi-use sports, leisure and education complex uses proposed may prove to be undeliverable. The suggested re-wording would be as follows:</p> <p>"A newer urban quarter will be created at Greenwich Peninsula West as shown on the proposals map as a strategic development location. The SDL will include residential as well as a range of other uses including leisure, commercial, retail, employment and other supporting service uses, as well as the Victoria Deep Water Terminal."</p> <p>"A masterplan SPD has been prepared for Greenwich Peninsula West to guide the development in this area. Where it can be demonstrated that there is insufficient viable demand to deliver the multi-use sports, leisure and education complex identified in the SPD, the</p>	501275	Mr Andrew Sack	Associate Gerald Eve on behalf of Morden College Trust	<a href="#">418</a>

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						<p>undeliverable.</p> <p>The issues outlined above, result in the Core Strategy failing to pass the test of soundness set out in the National Planning Policy Framework (NPPF) in relation to the specific requirement for the Core Strategy to be "effective". This is due to the following :</p> <ul style="list-style-type: none"> <li>• To be effective, the NPPF states that "the plan should be deliverable over its period". To be deliverable, flexibility is required. This is outlined in paragraph 21 of the NPPF where it states that,</li> </ul> <p>"In drawing up Local Plans, local planning authorities should: support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances."</p> <ul style="list-style-type: none"> <li>• Furthermore, Royal Greenwich acknowledges in the Guidance notes for Making Representations on Development Plan documents, that the plan should be "flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals".</li> <li>• With reference to these points, the Core Strategy does not have the flexibility to respond to changes in the market that may result in the need for retail, employment and other supporting service uses within the Greenwich Peninsula West Strategic Development Location.</li> <li>• In addition, the Core Strategy fails to sufficiently emphasise the need for flexibility in the event that proposals for the use of part of the Greenwich Peninsula West area for a multi-use sports, leisure and education complex, prove to be unviable and therefore undeliverable.</li> </ul> <p>For these reasons the Core Strategy fails to pass the test of soundness with regard to being "effective".</p>	<p>Council will consider a range of other uses including residential, leisure, commercial, retail, employment and other supporting service uses."</p>				
	Policy EA4 Strategic Industrial Locations	148451	Tilfen	No	No	<p>Policy EA4 includes the identification of West Thamesmead/Plumstead Industrial Area, including White Hart Triangle as Strategic Industrial locations (SIL) in accordance with the London Plan. We note that the GLA Land for Industry and Transport SPG 2012 identified</p>	<p>We consider that alternative uses be considered such as release for retail, builder's merchants, hotel etc.</p> <ul style="list-style-type: none"> <li>• Sui generis uses that are industrial in character</li> </ul>	382433	Mr Craig Blatchford	Blue Sky Planning	<a href="#">295</a>

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						<p>Greenwich as a 'managed transfer' Borough with a benchmark figure of 50ha of release of industrial land in the Borough up to 2031. This amount of release is consistent with the Council's own Employment Land Review which identified that a significant amount of SIL should be released in the Borough during the plan period. As a major owner of existing and former employment land within SIL, including much which is or will become surplus to requirements over the Plan period, Tilfen Land respectfully recommends a review of its holdings in partnership with the Council to assess whether any such land should be released to alternative non B Class, quasi employment or sui generis uses.</p> <p>For example the existing SIL designation includes areas such at the Tear Drop site (j15 on the UDP Proposals Map) and what is known as 2-6 Griffin Manor Way 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. In addition, their locations on the outer edge of the SIL designation rather than centrally within the SIL increases the prospects of delivering alternative employment generating development and maintaining the overall integrity of the wider SIL area.</p>	<ul style="list-style-type: none"><li>• Trade wholesalers (including cash and carry) and trade counters</li><li>• Other quasi employment uses</li></ul> <p>Non retail commercial uses (e.g. petrol filling station, car showrooms, etc</p> <ul style="list-style-type: none"><li>• Other uses which support the primary employment functions (i.e. creche, small scale retail serving local needs, etc)</li></ul>				
	Policy EA4 Strategic Industrial Locations	148496	Mr Frank King	No	No	<p>West Thamesmead and the White Hart Triangle are far better suited to residential development as all of the necessary infrastructure is already in place.</p> <p>Some expansion to the Doctors and Schools may be necessary, but Shops and Transport are already more than sufficient.</p> <p>This contrasts drastically with the Charlton Area which will need all of the above to be built. And who will pay for these infrastructures, the developers may agree to provide a few buildings, but they will not build enough. Maybe one doctor's surgery and a three or four shops. This will mean that the area will be starved of essential services for several years until the NHS and the Council can afford to add services piecemeal. In any case there is absolutely no possibility of building enough roads for the planned development.</p> <p>In any event. the Council say that the Charlton Riverside Site is spare industrial land because Companies are not moving in and utilising the available sites. Could this possibly be because the Council have been less than welcoming when enquiries have been made over the last six</p>	<p>Remove the blight by assuring all of the Businesses there at present and any business that want to come to Charlton that 400 feet from the Riverside will not be used for housing and that their businesses are safe.</p> <p>The Council may redevelop empty sites in future, but will not allow the 400 foot exclusion zone to be built on except by industry.</p> <p>Assure them that, after the blight, has been removed, any new business employing local people will be welcomed and ask them to put the word about in their trade associations that Charlton and Greenwich is open for business.</p>				<a href="#">454</a>

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						<p>years. Indeed they have stated that the Charlton Riverside Development will take place, and they thereby effectively blighted the area.</p> <p>Inspector, it might be useful if you asked the Council exactly where empty industrial sites are on the Charlton development site and compare it with the sites in use around it.</p> <p>There are about 150 Businesses actively trading in the Charlton development area, most of these co-operate with each other and have complimentary and even symbiotic relationships built up over many years. It is a delicate balance which, if disturbed, might result in some Companies moving out of London and some losing business and failing if they are forced to move.</p>					
	Policy EA4 Strategic Industrial Locations	166972	Cathedral Group	Yes	No	<p>Cathedral Group raises concerns regarding the defined boundary for the Strategic Industrial Location (SIL) at Greenwich Peninsual West as shown on proposals Map 8.</p> <p>There is no clear understanding how the boundary has been defined and there is no detail within the employment land review (2012) to justify the precise location of the boundaries. The SIL overlaps with the defined Strategic Development Location (SDL). However, there does not appear to be a clear case for why the boundary has been withdrawn in the way it has. This results in 3 points of significant concern (see the attached plan).</p> <p>1. There are two warehouses located to the south of the 'primrose wharf' label: a short square northern warehouse and a long rectangular southern warehouse.The northern warehouse should be included within the Strategic Industrial Location designation - so that it is consistent with the flipped safeguarded Tunnel wharf arrangement (discussed elsewhere in the represenations). However, the southern warehouse must be excluded. We have had a number of discussions with the GLA and PLA over the past 9 months with regards to the revised safeguarded wharfs directions. This arrangement was agreed with both parties and through representations to the safeguarded wharfs review.</p> <p>2. The boundary as shown results in a restriction in access to the SDL area across Morden Wharf. As currently shown, there is no access from Tunnel Avenue into the SDL area. It appears that the Council envisages a primary access through the Enderby Wharf site. This is not logical given that the roads will be smaller and routed through residential and employment areas. It is more sensible to create a good</p>	The boundary of the SIL needs to be amended. The proposed boundary accompaines this representation.	188810		Nathaniel Lichfield and Partners	<a href="#">478</a>

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						<p>access from Tunnel Avenue i.e. in order to ensure good accessibility to and permeability through the site.</p> <p>3. In addition to the inclusion of the southern warehouse into the SIL discussed in point 1 above, there is an area to the east of the southern warehouse (including Thames Bank House) that should also be excluded from the SIL defined area. Thames Bank House is currently vacant and there are no other buildings on this land used for employment purposes. This land would be more effectively used as part of the SDL and the mixed use development. This is not to say that employment generating uses will not come forward as part of the mixed use development in this location. Indeed, it is proposed that the Morden Wharf proposals will include employment generating uses but it is necessary to allow flexibility in designing and delivering the Morden Wharf scheme.</p> <p>It is important to note that the RBG adopted Masterplan provides this flexibility and indeed encourages it through its vision document.</p> <p>This additional SDL land would be equivalent to 2ha. The Employment Land Review (2012) states that a total of 41.4 to 42.4 ha has been identified for release across the Borough compared with the 50ha provided for in the GLA’s Land for industry and Transport SPG. This release does not result in a material change to the level of identified release. Further it also provides greater comfort to the Borough that the Greenwich Peninsula proposals can be delivered in this area.</p> <p>Cathedral Group agrees with the delineation of the SIL in the areas immediately to the West of the Alcatel factory site. There are opportunities for consolidation of the Alcatel factory to make the employment floor space more efficient which will meet the needs of the company as it continues to strengthen its presence in Greenwich. The consolidated land provides for a release of land for alternative use as part of the SDL. This is fully supported.</p>					
	Policy EA4 Strategic Industrial Locations	167229	Ms Lucy Owen	Yes	No	<p>Policy EA4 designates Strategic Industrial Locations for continued industrial use. Specific mention is made in the supporting text to the role of Angerstein Wharf (paragraph 4.2.14) and Victoria Deep Water Terminal (paragraph 4.2.16).</p> <p>It is questioned why there is only a reference to Angerstein Wharf and not Murphy's wharf as well in relation to the Aggregate Zone.</p>	<p>The supporting text should be updated to include reference to the role of Angerstein AND Murphy's wharves in the aggregates zone. The supporting text should be updated to include reference to the safeguarded status of Tunnel Wharf within Greenwich Peninsula West.</p> <p>The boundary of Greenwich Peninsula West SIL should be amended so that all of Bay Wharf is included within SIL.</p>				<a href="#">330</a>

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						<p>The amended boundary of Tunnel Wharf is located within the Greenwich Peninsula West SIL and its status as a safeguarded wharf should be reflected in the document — safeguarded wharves should only be used for waterborne freight handling use.</p> <p>Safeguarded wharves are not necessarily located in SIL and this is explained at paragraph 2.80 of the London Plan where it is stated: "SILs are located close to the strategic road network and many are also well located with respect to rail, river and canals which can provide competitive advantage and address broader transport objectives." There is therefore no in principle objection to the safeguarded Riverside Wharf not being located within either of the Charlton Riverside SIL's</p> <p>However, as highlighted in other representations on the Core Strategy, there are objections to the approach being advocated by the Council for Riverside Wharf and Tunnel Wharf and the lack of clarity in relation to Bay Wharf (which it would appear to be part in and part out of the SIL).</p>					
	Policy EA4 Strategic Industrial Locations	167326	Mayor of London	Not specified	Not specified	<p>The release of industrial land in the borough is supported by an up to date employment land review (ELR) (URS, 2012). The ELR undertook a quantitative and qualitative assessment of the boroughs employment sites, alongside analysis of local demand. The ELR concluded that there is between 44.8ha to 47.9ha of surplus industrial land in the borough. The borough ELR recommends the release of specific sites of between 41.4 to 42.4 ha over the Plan period (2013-2028). This range lies within the indicative benchmark of industrial land release in the Mayor's SPG Land for Industry and Transport (50ha for Greenwich over the period 2011-2031). The ELR recommendation allows scope for some further release over the plan period through development management which is supported in principle. The Core Strategy appears to reflect the ELR without exception. In purely quantitative terms, a release of between 41.4 to 42.4ha over the plan period would be acceptable in strategic terms. However, it would be helpful if Greenwich Council could confirm that the quantum of planned release in the Core Strategy matches that in the ELR or if there are any exceptions/divergences.</p> <p>The proposed geography of release of industrial land will result in the consolidation of two London Plan SIL (Charlton Riverside and Greenwich Peninsula West). The proposed consolidations have been the subject of discussions between the GLA and the borough, and are informed by the up to date local ELR which includes a</p>				<a href="#">164</a>	

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						qualitative assessment of the sites. The scale of release appears to be in line with the borough's ELR and the Mayor's SPG Land for Industry and Transport. The housing target for the Charlton Riverside has been reduced by 1,000 since the previous consultation and this is considered to be a more realistic figure and is supported. The vision for this opportunity area is also supported. However, given that the SIL is proposed to split into two parts, clarification is sought as to the individual areas (in hectares) of SIL remaining at these locations to enable each of them to be tested against the criteria in the Mayor's Land for Industry and Transport SPG. It is noted that the proposals are predicated on the delivery of the transit scheme which is not currently earmarked for funding by TfL.					
	Policy EA4 Strategic Industrial Locations	537756	Mr Richard Lee	Not specified	No	<p>The policies on economic activity are unsound as they lack the sustainable development approach required by national policy. For example, they fail to provide work where people live so as to reduce travel, and fail to maximise the potential of freight transport by river by safeguarding all wharves.</p> <p>The Local Authority evidence base is weak and there has been no informed consideration of alternative approaches. The policy of new urban quarters lacks specifics, whilst it is clear that the heavy focus on new residential development will both significantly reduce designated industrial space and situate residential accommodation alongside industry.</p> <p>The policy of releasing employment land for residential development will inevitably displace existing businesses and industries. There is the risk that jobs for local people will be low paid and with poor working conditions.</p> <p>In Woolwich town centre, the evidence already shows the problems caused by this approach, with the loss of industrial land and the failure to attract new tech companies leading to serious unemployment.</p> <p>In Greenwich Peninsula, the evidence shows the failure to integrate development into the existing character, and the threatened loss of Tunnel Wharf will intensify the problem.</p> <p>At Charlton Riverside, there is evidence that the industrial estates and independent businesses are thriving and provide opportunities for local employment and apprenticeship schemes.. The threat to Riverside Wharf undermines the potential of the river location to provide freight transportation and increased sustainability. The absence of consultation with existing businesses is at odds with what is expected of the Local Authority.</p>	<p>To be sound, the aspiration for employment growth needs a clear delivery plan showing how a net increase in jobs will be achieved. If there are to be quality jobs that meet the needs of local people, then policies are needed that promote training opportunities, economic diversification and the London Living Wage. These should all have been considered as an alternative option, also including green jobs and social enterprises. Policy support for local sourcing, local procurement, local shops and businesses and street/ covered markets will also help to deliver more sustainable local economic activity.</p> <p>To be sound the policy of new urban quarters should make clear reference to social, economic and green infrastructure. This could be expressed in the terms of a lifetime neighbourhood as set out in the London Plan.</p> <p>To be sound, the participation of local stakeholders, including the community, in the implementation of the policy.must be clear and deliverable.</p>				<a href="#">235</a>

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						We have raised these concerns at earlier stages in the preparation of the Core Strategy, but found the Local Authority unwilling to pursue a collaborative approach.					
	Policy EA4 Strategic Industrial Locations	630659		Not specified	No	<p>To comply with the NPPF it is considered that there should be flexibility within the employment policies to recognise that a wide range of employment uses including sui generis uses are considered acceptable on employment land and Strategic Industrial Locations. Costco requests that paragraph 4.2.15 is amended to recognise that sui generis uses are also suitable on Strategic Industrial Locations.</p> <p>It is also considered that it would be appropriate to provide a definition of uses suitable for employment land. The following definition of uses suitable for employment land is considered appropriate.</p> <p>"All buildings and land which are used or designated for purposes within the Use Class BI, B2 and B8 and closely related uses not falling within a use class, i.e. sui generis (such as warehouse clubs, cash and carry businesses and builders merchants) but which are commonly found in industrial estates."</p> <p>This definition will assist the Council by providing additional clarity for both the Council and developers by which to assess proposals.</p> <p>It is recognised and welcomed that Greenwich is promoting a number of substantial redevelopment opportunities through its Core Strategy, and it is acknowledged that there is an identified need for further housing and employment development within the borough.</p> <p>It is also noted that the authority has developed a number of masterplans which demonstrate that the quantum of development and range of uses promoted by the local authority can be delivered within various locations.</p> <p>However, in line with the NPPF it is important that there is flexibility to enable the local authority to respond to specific requirements and opportunities that may arise through the plan period. Therefore, it should be made clear within the emerging Core Strategy that the concept plans within the</p> <p>masterplans are indicative layouts. There may be equally acceptable alternatives configurations that would still deliver the mix of development being promoted by the local authority, but would provide significant benefits to the area.</p>		630643	Ms Karen Calkin	Associate R P S Group plc	<a href="#">260</a>

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						<p>Indeed, the emerging Core Strategy identifies substantial areas of residential allocations, but acknowledges that not all of this would come forward during the plan period.</p> <p>There should be sufficient flexibility within the identified regeneration and strategy development locations to enable individual proposals to come forward within the plan period and to enable a range of appropriate uses.</p> <p>The emerging documentation should enable opportunities for appropriate employment generating uses and enable proposals to be considered on their own merits.</p>					
	Policy EA4 Strategic Industrial Locations	759983	Ms Rinaani Musutua	Not specified	Not specified	Policy EA4 does not provide enough emphasis or clarity on the development of West Thamesmead/Plumstead Industrial Area and White Hart Triangle's benefit to the current community particularly regarding jobs. The policy will situate residential accommodation alongside industrial activities. It needs to provide the most appropriate and evidence based policy in terms of the environmental impact	The policy/strategic development should specify that the industries being development are required to include the hire of local employees whenever a suitable candidate exists. An effective approach to this would be to including any prominent skills that already exist in the Thamesmead area by choosing a complementary industry. The policy needs a clear delivery plan showing how a net increase in jobs will be achieved. It needs to address the residential access and services needed that additional residential development will require.				<a href="#">280</a>
	Policy EA4 Strategic Industrial Locations	166972	Cathedral Group	Yes	Yes	As stated in response to policy EA2, the retained Strategic Industrial Locations should be regularly reviewed so that further release can occur where demand no longer supports its protection for employment uses.		228178	Ms Diana Thomson	GVA Grimley	<a href="#">467</a>
	Policy EA4 Strategic Industrial Locations	495574		Not specified	No	<p>CIS strongly rejects to the Councils proposal to retain the Westminster Industrial Estate (WIE) as a Strategic Industrial Location (SIL).</p> <p>The Council's decision to retain the land as a SIL has not been proposed in any previous</p> <p>versions of the Core Strategy. It is also in direct conflict with the Councils Adopted SPD Master Plan for the Charlton Riverside which clearly identifies the WIE for both residential and creative industries. As residential uses are prohibited in SIL's adoption of the proposed Core Strategy would render the Adopted Master Plan SPD as undeliverable.</p> <p>Whilst we acknowledge that the decision to identify SIL's within the SDA was in response to the GLA's comments to a previous draft of the Core Strategy, there is nothing in the submission version or the Council's evidence base to justify the allocation of WIE.</p>		495566	Mr Thomas Hatch		<a href="#">362</a>

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						<p>In addition to need for the WIE to be re-developed in order to facilitate the regeneration of the</p> <p>Charlton Riverside and for the Council to meet its strategic objectives including housing deliver, as discussed in Representations 1 and 2, it is also submitted that the WIE is not suitable for retention as a SIL.</p> <p>Whilst the Councils Employment Land Review states otherwise that document is considered to</p> <p>be unsound in its approach, whereby it groups several estates together for assessment, and in</p> <p>its findings in which it assesses the WIE to be in very good condition. The period buildings to</p> <p>the north east of the WIE site are largely vacant and/or derelict. Most of these units are in such poor condition that they are no longer suitable for occupation. It has proven not to be financially viable to refurbish or re-develop the buildings for employment use. The units which are available are no longer suitable for modern day employment use and as a consequence remain largely vacant.</p> <p>The London Plan and the Mayors Industrial Land SPG (2012) clearly states that the condition and level of occupancy are important considerations when assessing the suitability for land to be allocated as within a SIL.</p> <p>The NPPF is clear that land should not be retained for employment purposes if there is no</p> <p>prospect of it being used for that purpose. WIE falls within that category.</p> <p>Therefore, the plan is unsound in this respect.</p>					
	Policy EA4 Strategic Industrial Locations	501281		Yes	No	<p>The Core Strategy Proposals Map - Proposed Changes Submission Version identifies a parcel of land on Map 8 as part of the Greenwich Peninsula West Strategic Industrial Location (SI L). A significant proportion of the land identified in this allocation is owned by Morden College.</p> <p>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. In the experience of Morden College, this is likely to continue and therefore an approach to consolidation needs to be established. Reinforcing this point, paragraph 4.2.10</p>	<p>In the experience of Morden College, the current decline in industrial activity 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 classifications.</p> <p>As set out in section 5 and 6, the Core Strategy lacks flexibility with regard to Policy EA4 and is therefore not "effective". To enable the Core Strategy to pass the NPPF test of "soundness", in</p>	501275	Mr Andrew Sack	Associate Gerald Eve on behalf of Morden College Trust	<a href="#">419</a>

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						<p>identifies that the area shows little sign of growth and indeed there has been a gradual decrease in industrial activity.</p> <p>By protecting the area for continued industrial use, policy EA4 of the Core Strategy therefore fails to incorporate the necessary flexibility to deal with the continued decline of industrial uses in the area.</p> <p>The issues outlined above result in the Core Strategy failing to pass the test of "soundness" set out in the National Planning Policy Framework (NPPF) in relation to the specific requirement for the Core Strategy to be "effective". This is due to the following:</p> <ul style="list-style-type: none"><li>• To be effective, the NPPF states that "the plan should be deliverable over its period". To be deliverable, flexibility is required. This is set out in paragraph 21 of the NPPF where it states that,</li></ul> <p>"In drawing up Local Plans, local planning authorities should: support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances."</p> <ul style="list-style-type: none"><li>• The NPPF also states in paragraph 22 that,</li></ul> <p>"Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable communities".</p> <ul style="list-style-type: none"><li>• As outlined previously, due to a gradual decline in industrial activity, there is little reasonable prospect of the whole of the area covered by Policy EA4 continuing to remain in industrial use in the medium to long term. Therefore Policy EA4 is not "effective" because it protects industrial uses without incorporating the necessary flexibility to deal with a wider decline in industrial activity in the area. In turn, this also threatens the deliverability of certain elements of Policy EA3.</li></ul>	<p>terms of being "effective", it is necessary to amend Policy EA4 to increase the flexibility with regard to the range of uses identified. It is therefore suggested that the following text is included at the end of Policy EA4 as follows:</p> <p>"Where it can be demonstrated that Greenwich Peninsula West is no longer viable for industrial use (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."</p>				

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	Policy EA4 Strategic Industrial Locations	760702	Royal Mail	No	No	<p>Map 7</p> <p>Royal Mail’s Charlton Local Depot is surrounded by retail warehouse uses along Bugsby’s Way and industrial uses are located in the wider area.</p> <p>We note that these premises fall within the draft Charlton Riverside Strategic Industrial Location (Map 7). Draft Core Strategy Policy EA4 states that this area will be protected for continual industrial use.</p> <p>We are aware that the Charlton Riverside Masterplan SPD (2012), which was adopted in April 2012, allocates Charlton Local Depot for continued industrial/ employment use and the land to the south of the site, south of Bugsby's Way for retail use. The draft documents currently on consultation therefore place a more restrictive draft allocation for continued industrial use on this Royal Mail site, despite its location on Bugsby’s Way which is characterised by retail warehouse uses.</p> <p>Royal Mail strongly object to the allocation of Charlton Local Depot for continual industrial use in the draft documents.</p>	<p>We formally request that Charlton Local Depot is removed from this allocation and that it instead falls within the surrounding allocation for Charlton Riverside Strategic Development Location (Map 2), where draft Policy EA2 promotes the development of a new mixed use urban quarter and 3,000 - 5,000 new homes.</p> <p>We formally request that the wording of Policy EA2 is amended as follows to better reflect the aspirations of the adopted Charlton Riverside Masterplan SPD (2012) and the characteristics of the Royal Mail site and surrounding retail warehouse uses:</p> <p>"Land at Charlton Riverside is allocated as a Strategic Development Location (as shown on the Proposals Map) and will include a new mixed-use urban quarter. Employment will be consolidated to maximise the use of land whilst maintaining employment levels in the waterfront area. Within the boundary of this Strategic Development Location, retail uses will only be appropriate to the north and south of Bugsby's Way.</p> <p>Out of town centre retail development will be resisted in the remainder of this area and the quantity and quality of open space will be increased".</p> <p>Again, it will be essential that Royal Mail’s existing operations on the site are relocated/re-provided at suitable alternative sites. It would be essential that any new facilities are provided prior to the demolition of those existing, to ensure Royal Mail’s continuity of service. This will ensure that Royal Mail’s operations will not be prejudiced and that they can continue to comply with their statutory duty to maintain a ‘universal service’ for the UK pursuant to the Postal Services Act 2000.</p> <p>In order for the site to be brought forward for redevelopment, relocation will need to be viable for Royal Mail. There will need to be a commercial attractiveness that would incentivise the business to relocate the operations.</p>	760699	Claire Davies	DTZ	<a href="#">397</a>
	Policy EA5 Tourism	147465	Graham Saunders	Not specified	Not specified	<p>We welcome the policy and its promotion of key visitor attractions in the Royal Borough. We</p> <p>would suggest the Ranger’s House and the Wernher</p>					<a href="#">188</a>

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						Collection are added to the list of sites outlined in the second point of the policy.					
	Policy EA5 Tourism	166972	Cathedral Group	Yes	Yes	<p>Cathedral Group supports the Borough's aspirations for a range of tourist facilities including arts, culture, sporting and entertainment activities.</p> <p>Further it supports the expansion and diversification of the tourism industry to secure the position of the waterfront area on the Peninsula as a major tourism centre for the Thames Gateway.</p> <p>Finally it also supports the strategy to increase the number of visitors staying overnight by encouraging the development of hotels particulalry in town centre and the waterfront area.</p>		188810		Nathaniel Lichfield and Partners	<a href="#">497</a>
	Policy EA5 Tourism	167229	Ms Lucy Owen	Yes	Yes	<p>The reference to ensuring that major tourist facilities are well served by public transport including use of the River Thames is welcomed and accords with London Plan policy which seeks to increase the use of the Blue Ribbon network for passenger and tourist river services.</p> <p>The reference to the permitted cruise liner terminal at Greenwich Peninsula West is also welcomed and the PLA is working closely with the developer on this project.</p>					<a href="#">337</a>
	Policy EA5 Tourism	167239		Not specified	Not specified	GH is supportive of this policy and, in particular, the recognition that tourist facilities should embrace a wide range of arts, culture, sporting and entertainment activities for participation and enjoyment by all sections of the community. GH considers that the potential to build on the 'Olympic effect' and to work towards delivering a distinct and successful legacy is a core foundation of the future success of Greenwich town centre, as referred to in paragraph 2.1.11.		760672	Ed Britton	Deloitte Real Estate	<a href="#">388</a>
	Policy EA5 Tourism	762451	Laura Williams	Yes	No	<p>In line with Core Strategy Policy EA5 Tourism, Aluna will contribute to the expansion and diversification of the Royal Borough's tourism industry by:</p> <ul style="list-style-type: none"> <li>♣ Helping secure the position of the waterfront area [...] as a major tourism centre for the Thames Gateway;</li> <li>♣ Building upon and regenerating the maritime, science and industrial heritage of Greenwich on the Greenwich Peninsula;</li> <li>♣ Linking with existing tourism attractions such as National Maritime Museum, The Cutty Sark, Royal Observatory Greenwich, the Thames Path and Thames</li> </ul>	<p>Policy EA5 Tourism</p> <p>The Council will support the expansion and diversification of the Royal Borough's tourism industry by:</p> <ul style="list-style-type: none"> <li>♣ Securing the position of the waterfront area including the Maritime Greenwich World Heritage Site, the Peninsula and the Royal Arsenal as a major tourism centre for the Thames Gateway;</li> <li>♣ Capitalising on the Borough's existing tourism attractions including the National Maritime Museum, The Cutty Sark, the Royal Observatory, Old Royal Naval College, the O2 Arena, Eltham</li> </ul>				<a href="#">481</a>

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						<p>Barrier through Aluna’s cultural and educational programming;</p> <p>♣ Being directly accessible: by river (Aluna has its own pier) from Greenwich Town Centre and the rest of London’s Thames; by foot/bicycle along the Thames Path; and by tube to North Greenwich;</p> <p>♣ Embracing a wide range of cultural activities within and associated with Aluna for participation and enjoyment by all sections of the community;</p> <p>♣ Helping promote Royal Greenwich’s profile as an Olympic Borough, continue to draw visitors, and secure the Olympic Legacy through continued intercultural dialogue and celebration of world cultures and London’s cultural diversity.</p> <p>It is also consistent with wider tourism-related planning policy, and is therefore an ideal example to be included in the list of objectives in this policy.</p> <p>The London Plan supports the development of new projects like Aluna:</p> <p>“LP 4.32 London’s cultural and creative sectors are central to the city’s economic and social success. The Mayor’s Cultural Metropolis seeks to maintain the capital’s status as one of the greatest world cities for culture and creativity, and addresses the need to increase the provision of arts and culture facilities in outer London, providing targeted support for the creative industries.</p> <p>LP 4.5 London’s visitor infrastructure: “promote, enhance and protect the special characteristics of major clusters of visitor attractions including those identified in Strategic Cultural Areas”</p>	<p>Palace, Charlton House, the Royal Arsenal, Woolwich Barracks, Firepower, Thames Barrier, the Green Chain and the Thames Path;</p> <p>♣ Seeking a range of new tourist facilities which embrace a wide range of arts, culture, sporting and entertainment activities for participation and enjoyment by all sections of the community, such as the Aluna tidal-powered lunar clock near where the meridian meets the Thames, and in particular maximising the benefits offered by the 2012 Olympic and Paralympic Games and securing an Olympic legacy;</p> <p>♣ Increasing the number of visitors staying overnight by encouraging the development of hotels particularly in town centres and the waterfront area; and</p> <p>♣ Ensuring that major tourist facilities are well served by public transport including use of the River Thames.</p>				
	Policy H(a) Protection of Existing Housing	745440	Ms Sharon Hayward	Not specified	No	<p>The policy is unsound because: it is inadequate in providing a strategy / most appropriate and evidence-based policy for protecting existing homes.</p> <p>Protecting and retrofitting existing homes can assist in retaining strong and sustainable communities, significantly improve the environmental quality of homes, reduce CO2 emissions and fuel poverty. In respect of social-rented homes, protecting existing homes could mean retaining as much genuinely affordable housing as possible at a time of policy change around housing tenure and funding for any new and or replacement homes.</p>	<p>To ensure this policy is sound, provides sustainable development and is appropriately evidence based, H (a) should</p> <ul style="list-style-type: none"> <li>• encourage retrofitting, repair and refurbishment of existing homes;</li> <li>• encourage access to all possible funding for retrofitting homes and reducing CO2 emissions;</li> <li>• include a section on protection of social-rented homes particularly in regeneration schemes and a presumption against demolition unless a full social</li> </ul>				<a href="#">332</a>

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						<p>RBG expressed its own concerns about the affordability of ‘affordable (up to 80% market) rent’ homes, (in its response to the consultation on the REMA of the London Plan). Higher rents means greater difficulties for households in trying to meet housing costs without being dependent on benefits</p> <p>Generally there has been a failure to deliver the numbers of new and additional social rented homes required in the borough (2007-12) and a significant loss of social-rented homes in the Kidbrooke intensification area.</p> <p>Both demolition and building of new homes carries with it a high embodied carbon cost.</p>	<p>and environmental cost analysis (of benefits or otherwise) of demolition v refurbishment has been carried out. Such an analysis should take into account social costs and benefits, including (i) analysis of rental and benefit costs, (ii) loss of family and friend networks, (iii) potential impact on health of households, particularly elderly people, in respect of remaining in their homes through refurbishment or displacement through demolition It should also take into account environmental costs and benefits, including embodied carbon costs;</p> <p>• require (i) the full involvement of tenants and residents in any plans for demolition, (ii) provision of alternatives from an early stages of the consultation processes, and (iii) an analysis of costs as highlighted above.</p>				
	Policy H(a) Protection of Existing Housing	757394	Miss Susie Wilson	Not specified	No	<p>Policy H (a) is inadequate in providing a strategy that might best protect availability of social rented housing; through protection of existing homes in the RBG. This is very important at a time when policy changes around housing tenure and funding for development of new 'affordable homes means that lost / demolished existing social-rented homes will unlikely be replaced (with new social-rented homes). This has a significant London impact in terms of the availability of genuinely affordable housing. H(a) does not then provide the most appropriate and evidence-based policy on protecting existing homes.</p> <p>H(a) also does not provide the most appropriate and evidenced based policy in terms of the environmental impact in terms of demolition of existing homes. Most plans for demolition fail to take into account environmental (particularly embodied carbon) costs.</p>	<p>To ensure this policy H(a) is sound, it is essential to provide a section on regeneration that would require a thorough evidence-based analysis of each proposed regeneration schemes that include demolition of social-rented homes.</p> <p>Such an analysis should set out costed benefits or otherwise of demolition versus refurbishment. It should take into account - the social costs of the loss of large numbers of social rented homes; the impact of this on attempts to address deprivation and inequality and to sustain existing communities in an Olympic borough. It should take into account environmental costs — particularly embodied carbon costs and any loss of green space.</p> <p>To ensure the policy H(a) is sound it should include a presumption against demolition of large social housing estates, without evidence of benefit through analysis suggested above.</p>				<a href="#">456</a>
	Policy H(b) Conversions	147465	Graham Saunders	Not specified	Not specified	<p>We welcome the reference to point iii (in the first part of the policy) and the reference to the</p> <p>character and appearance of the surrounding area and buildings. We would suggest that in</p> <p>the supporting text reference should be made to the heritage policies of the plan where</p> <p>heritage assets may be adversely affected by inappropriate conversions. This is particularly</p>					<a href="#">186</a>

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						important in the case of listed buildings where inappropriate conversions can undermine the significance of the asset.					
	Policy H(b) Conversions	148486	Ms Wendy Shelton	Not specified	Not specified	Policy H(b) Conversions - support paragraph 4.1.42 refers to a new Supplementary Planning Document detailing design standards for conversions which will supersede the Council’s current Advice Note 3 “Planning Standards for Conversions”. It is essential that the new document be prepared in draft form to allow for public consultation in the same manner in which the emerging Design Guidance for Residential Extensions SPD - referred to in support paragraph 4.4.38 to Policy DH(a) Residential Extensions and in the support paragraph 4.4.41 to Policy DH(b) Protection of Amenity for Adjacent Occupiers - is anticipated to be published in draft form in 2013.					<a href="#">214</a>
	Policy H(c) Backland and Infill Development	629637	Dr Leslie Clark	Yes	No	<p>I consider policy H(c) Backland and Infill Development of the DPD to be unsound because it is not compatible with the Biodiversity Action Plan and with section 4.4.8 of the DPD which both state that Gardens are a priority habitat.</p> <p>It also, in point (v) talks about the density of the development in a way that is imprecise and difficult to determine.</p> <p>The "character of the area" is a consequence of factors other than just the "scale, design and density of the development" - for example the pattern of garden and housing in an area and the amount of open space compared to built up space, which are not adequately conveyed by this policy. The London Plan takes the concept of character further, in policy 3.5:</p> <p>"The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children and older people."</p> <p>In addition the policy does not take advantage of the clause in policy 3.5 of the London plan allowing a presumption against building on garden land.</p>	The DPD should change to include a presumption against development on back gardens or other private residential gardens as allowed in policy 3.5 of the London Plan. It should also be reworded to make it clear what densities are allowable in different areas and to broaden the definition of the character of an area.				<a href="#">13</a>
	Policy H(c) Backland and Infill Development	147465	Graham Saunders	Not specified	Not specified	<p>As with the policy above we welcome the need for developments to consider the character of</p> <p>the area (point v). We would suggest that the supporting text also makes a cross reference to</p>					<a href="#">187</a>

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						<p>areas that may contain heritage assets and the need for considering heritage policies in the</p> <p>plan when exploring the potential for development.</p>					
	Policy H(c) Backland and Infill Development	148486	Ms Wendy Shelton	Not specified	Not specified	Policy H(c) Backland and Infill Development - refer to comments on Policy DH(a) and DH(b).					<a href="#">215</a>
	Policy H(c) Backland and Infill Development	502653	Linda Pound	Not specified	No	BACKLAND SITES Research/fact finding are sketchy/insufficiently detailed. Although backland and infill sites seem to be largely protected from development, the Glossary definition on Page 234 (extracted from the Planning Portal Glossary which is itself due to change) takes no account of sites which occupy a corner and thus have some street frontage. Although para 4.1.43 states that domestic gardens are not classified as brownfield (implying they are Greenfield and thus protected from development) there is no mention of how land which was formerly part of a garden, but sold off and left untouched is now to be regarded.	Corner plots should be included in the overall definition of backland, as these plots frequently form a significant part of; for example, an ecosystem and development would result in fragmentation and disruption. There should be specific clarification of how former gardens are to be treated. These definitions are necessary to make the Development Plan Document sound. The current wording is imprecise and open to arbitrary interpretation rather than "flexibility".				<a href="#">299</a>
	Policy H(e) Children's play areas	166965	Berkeley Homes	Not specified	Not specified	<p>Draft Policy H(e) requires residential developments to provide children's play areas in developments of over 50 family housing units.</p> <p>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 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.</p> <p>The policy should be reworded to take account of these comments.</p>		188419	Mr Bob McCurry	Senior Planner Barton Willmore	<a href="#">404</a>
	Policy H(e) Children's play areas	759983	Ms Rinaani Musutua	Not specified	Not specified	Policy H(e) seems to exclude the development of children's play area in current developments with less than 50 units of family housing. If Every Child Matters is adhered to, all residential areas should have a play area regardless of the amount of family units that exist in the area. The SE28 8TL has no play area. The nearest play area available to those families in that location is 15 minutes walk. Thamesmead lacks facilities such as the play area in Charlton Park that encourages parents to participate in activities enjoyed by their children. The only indoor play area, Tiger Tiger, at Cannon Retail Park, costs £5 per child which families are unable to afford	To be sound, the policy needs to clearly identify/map areas which lack children's play area and a strategic clearance on how the need for them will be met. The policy should put an emphasis on developing play areas which also encourage parents to participate in different activities with their children. The policy should be less prohibitive to delivering the development of play areas where needed. It should also mention the types of play areas needed such as indoor play areas which are good for rainy days. More affordable family activities should be provided.				<a href="#">281</a>

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							Pubs such as Princess Alice in West Thamesmead could be made more family friendly by providing play areas. Skate Parks, ice skating and roller skating rinks should be provided to keep young people from lingering around convenience stores. Policing of people who loiter and dog owners who allow their dogs to deposit waste on children's play areas should be implemented.				
	Policy H(e) Children's play areas	166972	Cathedral Group	Yes	Yes	<p>We support the threshold of 50 family units for on-site provision of children's play facilities, as this</p> <p>allows greater flexibility for smaller developments. As a result this is likely to improve the viability</p> <p>of small schemes and allow greater housing growth to be achieved.</p>		228178	Ms Diana Thomson	GVA Grimley	<a href="#">464</a>
	Policy H(e) Children's play areas	745440	Ms Sharon Hayward	Not specified	No	<p>The policy is unsound because: it is it is not justified, is insufficiently effective and not consistent with the London Plan. The London Plan policy 3.6 covers children and young people's play and informal recreation facilities. The policy says that boroughs should produce strategies on play and informal recreation supported by LDF policies to improve access, safety and opportunity for all children and young people in their area. The RGB policy mentions young people in the last section of supporting text, but the policy focuses exclusively on smaller children's play.</p> <p>Tenants, resident and community groups we have worked with suggest that children's and young people's play areas being developed on.</p>	<p>That the policy be</p> <ul style="list-style-type: none"> <li>renamed - 'children and young people's play and informal recreation'</li> <li>should state - 'appropriate provision should be included in developments for different age groups'</li> <li>provide a presumption against the loss of any children or young person's play areas unless a suitable alternative space is provided.</li> </ul>				<a href="#">333</a>
	Policy H1 New Housing	629637	Dr Leslie Clark	Yes	No	<p>The core strategy policies H1 and H3 are unsound as the strategy does not meet requirements of national policy to take full account of relevant market and economic signals.</p> <p>While housing targets conform to the London Plan and are aspirational, the evidence of delivery of new homes from 2007-12 in Greenwich (where only 43% of the borough's target was met), suggests that these are not realistic and that there is a need to consider alternatives in terms of delivery or at the very least to include a contingency.</p> <p>Failure to deliver, particularly in relation to genuinely affordable housing (where evidence of need is consistently greatest), will impact detrimentally not just in Greenwich but also in other neighbouring SE London boroughs, areas outside London and indeed on delivery of London-wide housing targets. Only 17%, of the already low delivery of all type of homes, were social rented (over the period 2007-12).</p>	<p>To be sound, there is a need to consider contingencies in relation to policies H1 and H3 should the market model for delivering homes continue to fail in Greenwich. These could include handing over of public land to community land trusts, to self-builders and / or to co-operative housing organisations, that might successfully deliver in terms of numbers and long-term affordability.</p> <p>To be sound, policy H3 needs to set a clear overall target for delivering affordable homes in addition to including an assertion that at least 35% of homes delivered should be affordable on each site with 10 or more homes or of 0.5 hectares or more in size. We propose that that target should be 50% affordable housing with 70% of this target being social-rented.</p>				<a href="#">19</a>

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						<p>The evidence base for policy H3 is weak and out of date and does not provide a current and objectively assess need in the housing market as required by national planning policy. While the Affordable Housing Viability Assessment is recent (updated in December 2012) the SHMA of 2009, is out of date. The SHMA does not take into account:</p> <p>a) 2011 census data;</p> <p>b) the impact of on-going failures to deliver sufficient social-rented homes over the last four / five years;</p> <p>c) the impact of welfare reform, particularly in respect of assumed access to the private-rented sector in Greenwich;</p> <p>d) the number of households that might / might not be able to meet the cost of affordable rent homes (even with access to benefits).</p> <p>There is concern that any failures to deliver genuinely affordable homes, especially in the opportunity areas in the North of the borough, will compromise delivery of London Plan policies that the borough is required to be in general conformity with, including on - mixed and balanced communities, tackling deprivation and inequality and sustaining existing stable communities.</p>	To be sound, monitoring of targets for delivery of homes should include the tenure of homes across the borough and particularly in the specific opportunity area sites.				
	Policy H1 New Housing	634722	Crossrail	Not specified	Not specified	<p>As stated above, we support the Borough's desire for growth and thus support the use of</p> <p>minimum targets for housing delivery, as set out in the London Plan. However, we suggest that</p> <p>the drafting of the policy should be amended to read, 'the Borough's current target for the</p> <p>plan period is to meet a minimum of 29,078 net additional dwellings and where possible, to</p> <p>exceed this target' to accord with Policy 3.3 of the London Plan.</p>		634723	Stephen Harrington	GVA Grimley	<a href="#">89</a>
	Policy H1 New Housing	501408	Mr John Franklin	Not specified	No	<p>A high level of new house building is needed in Greenwich but the targets look over-ambitious in the light of recent output and the continuing problems and uncertainties in the housing market. The strategy maintains the target of 2595 completions a year to 2021 as proposed in the previous DCS and as set in the London Plan. There is a reduction of 3160 in the target up for 2013-2028 but this is all concentrated in the years after 2021.</p>	<p>The targets for 2013-2021 should be reduced and should increase year by year from a lower base. The adjustment should be made in consultation with major developers and house-builders with current and prospective planning consents in the borough.</p>				<a href="#">131</a>

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						<p>The realism of this target is very questionable. New housing completions in Greenwich have only exceeded 2000 once in the past 12 years and have been running at much lower levels recently. There were 1020 completions (all tenures) in 2011-12. Council Cabinet papers relating to Council Tax for 2013-14 predicted that the addition of new houses to the taxable stock of dwellings in the borough would be 1017 in the coming year.</p> <p>Over-ambitious targets could result in the granting of planning permission for an excessive number of dwellings in the short term which could result in a dispersion of development. This would make adequate provision of physical and social infrastructure even more difficult than it would be if the housing targets were fulfilled. In addition very unrealistic targets may well have a negative effect on those responsible for helping to increase the supply of new housing in RBG.</p>					
	Policy H1 New Housing	147829	Ms Anna Townend	Not specified	No	<p>The Open Space Strategy is unpublished (p153/para 4.7.28). The high level of new homes proposed (29,078 minimum) are unsustainable as is the expected population increase (which exceeds the London and National average), (for) which the Housing is planned to accommodate. Greenwich's own natural increase needs are only a small part of this excessive target and London's growth (which is the given need) could reverse with government policy changes within the core strategy time-frame. This possibility, as a "sustainability alternative" should be identified as a green strategy policy in tandem ie. "limits to growth" options to each strategic policy should be given in the submission version of the core startegy and cover the Opportunity Areas of Greenwich Peninsula, Woolwich, Charlton Riverside, Deptford Creek/Greenwich Riverside.</p>	A large reduction in forecast housing growth generated by settlement from outside the borough.				<a href="#">354</a>
	Policy H1 New Housing	166965	Berkeley Homes	Not specified	Not specified	<p>Policy H1 seeks to ensure that 2,595 additional dwellings are delivered per year up until 2021 and then sets a reduced target to ensure that 1,188 dwellings are delivered per year for the period 2020/21 to 2026/27.</p> <p>We understand that the Royal Borough of Greenwich have set a lower housing target from 2020/21 to 2026/27 because they do not feel it will be possible to sustain housing delivery at the current rate post 2020/2021 as the supply of large strategic sites for housing would have been exhausted.</p> <p>Whilst we acknowledge the Council’s reasons for having a lower target from 2020/2021 it is often the case that housing output on strategic sites is normally above that anticipated at a strategic level. With this in mind, and the commitment in the London Plan (July 2011) to amend and update the housing supply figures and housing targets by 2015/2016,</p>		188419	Mr Bob McCurry	Senior Planner Barton Willmore	<a href="#">400</a>

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						we would like to see a commitment from the Council in the supporting text to monitor and review the housing targets by 2015/2016 so they are aligned with the London Plan.					
	Policy H1 New Housing	166972	Cathedral Group	Yes	No	<p>Cathedral Group raises 2 concerns:</p> <ul style="list-style-type: none"> <li>• Housing Target</li> <li>• Recognition of periodic revision to London Plan targets</li> </ul> <p>Firstly, Table 3.1 of the London Plan identifies a ten year target of 29,950 or 2595 per annum to 2021.</p> <p>Policy H1 of the RBG Core Strategy seeks the delivery of 25,95 dwellings to 2021/22 (with a residual 20,760 to achieve from 2013/14) but then seeks only 8318 dwellings or 1188 per year in the following period to 2027/28.</p> <p>Policy 3.3 of the London Plan states that Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1 and, ‘if a target beyond 2021 is required, roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target’. Whilst there is recognition in policy H1 that the borough’s housing target for the plan period is a minimum rather than maximum figure, the housing target for the period 2021/2022- 2027/2028 should be a minimum of 2595 dwellings a year rather than 1,188.</p> <p>There is no justification for a reduced figure (less than half) and as such the DPD is unsound on this matter.</p> <p>Further, the current wording of the policy is at odds with the preferred strategy to achieve high growth levels across the Borough.</p> <p>Secondly and related to the first point, there is no recognition in the policy that the Maypr will undertake a review of London-wide targets in 2015/16. Paragraph 3.24 of the London Plan states:</p> <p>‘LDFs should roll forward the annual targets in Table 3.1 expressing the rolling target as an indicative figure to be checked and adjusted against any revised housing targets.’</p> <p>Policy H1, nor its supporting paragraphs make such an explicit reference. The DPD should include policies that are ‘effective’ i.e. that it should show a clear path for the delivery of the strategy and that the DPD is flexible, dealing with changing circumstances. The current wording does not provide sufficient robustness to recognise that the targets</p>	<p>The housing target should be amended so that the target for seven years from 2021/2022 to 2027/28 is 2595 net additional dwellings per year.</p> <p>The policy should also be amended to include reference to the Mayor's review of housing targets. Suggested wording:</p> <p>It is noted that the Mayor of London will undertake periodic reviews of housing targets set out in the London Plan. The Boroughs housing targets will be revised accordingly during this plan period.</p>	188810		Nathaniel Lichfield and Partners	<a href="#">482</a>

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						could change as early as a year after adoption of the DPD.					
	Policy H1 New Housing	167229	Ms Lucy Owen	Yes	No	<p>Policy H1 sets out the Borough's housing targets and advises that new housing is expected to be developed in the Borough's six Strategic Development Locations. The supporting text refers to the waterfront area being transformed into a mix of residential led uses and the broad Strategic Development Locations being crucial to meeting the Borough's Housing targets. This is a rather blanket approach to the riverside, that does not reflect the diverse river related activities that occur, require a riverside location and should be protected.</p> <p>London Plan policy prioritises the use of the waterspace and land alongside it for water related purposes; it seeks to increase the use of the Blue Ribbon Network for passenger and freight transport; protects existing facilities for waterborne freight traffic, in particular safeguarded wharves should only be used for waterborne freight handling use; and protects waterway support infrastructure such as boatyards, moorings, jetties and safety equipment.</p> <p>The Council's proposed approach for housing as set out in policy H1 is not consistent with any of the London Plan policies. The Council will also be aware of the above London Plan policies and their application in relation to existing developments in the Borough. For example there were extensive discussions between the safeguarded wharf operators of Angerstein and Murphy's wharves, the PLA and the developer in relation to phases 3,4 and 5 of Greenwich Millennium Village and issues relating to juxtaposition of land uses.</p>	Policy H1 should be amended to include reference either within the policy itself or its supporting text to the important protected river related infrastructure/uses along the waterfront. It should be made clear that development along the waterfront should not prejudice the river related infrastructure/uses either by being located directly on land that is protected or by being located in close proximity without appropriate mitigation				<a href="#">230</a>
	Policy H1 New Housing	167326	Mayor of London	Not specified	No	The core strategy sets a target for the plan period (2013-2028) of 29,078 dwellings. This consists of 2,595 dwellings per year as per the 2011 London Plan for the period 2013/14-2020/21 plus an additional 8,318 dwellings from 2020/21-2027/28. Whilst these figures are in line with the London Plan it should be noted that their delivery are predicated on development which impacts on safeguarded wharves in Greenwich Peninsula West which is not in general conformity with the London Plan and the Council sets out that the development at Charlton Riverside is 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.					<a href="#">162</a>
	Policy H1 New Housing	745440	Ms Sharon	Not specified	No	The policy is unsound because: The policy does not meet the requirements of the NNPF; it does not take full account of relevant market and economic signals and it is not deliverable.	Alternatives need to be considered and a contingency set out in the strategy. This could include handing over public land to community land trusts, self-builders and / or to co-operative				<a href="#">324</a>

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			Hayward			While the housing targets conform to the London Plan and the London SHLAA, they are simply aspirational. Evidence of delivery of new and additional homes, from annual monitoring reports of the London Plan, show that only 43% of the borough's targets for homes were met from 2007-12.	housing organisations that might successfully deliver homes that are needed in the borough.				
	Policy H1 New Housing	166972	Cathedral Group	Yes	Yes	<p>In addition to the promotion of growth, planning must also provide sufficient flexibility to ensure that sites can be addressed on their own merits and can respond to their local context. In its current drafting there is not sufficient flexibility in a number of policies to ensure that the needs of Greenwich are met, in both the short and long term. Each policy should make clear that, in those circumstances where it is neither practical nor appropriate to comply with requirements set out in policy, the presumption in favour of sustainable development will be applied and schemes will be assessed with regard to their overall benefits.</p> <p>There is currently a clear growth agenda at the national level seeking to optimise housing and economic development. The National Planning Policy Framework (NPPF) sets an overarching emphasis on encouraging new development and ensuring that it is not overburdened by the planning process, with a presumption in favour of sustainable development at its heart. Planning should operate to encourage and not act as an impediment to sustainable growth (Para 19). We firmly support the Borough's aim of according with this approach as evidenced in the draft Core Strategy with Development Management Policies, however, we suggest amendments below where necessary to ensure that the proposed policies can help to ensure that the desired growth is achieved.</p> <p>We support the Borough's desire for growth and thus support the use of minimum targets for housing delivery, as set out in the London Plan. However, we suggest that the drafting of the policy should be amended to read, 'the Borough's current target for the plan period is to meet a minimum of 29,078 net additional dwellings and where possible, to exceed this target' to accord with Policy 3.3 of the London Plan.</p>		228178	Ms Diana Thomson	GVA Grimley	<a href="#">460</a>
	Policy H1 New Housing	495574		Not specified	Not specified	<p>The Councils proposal to concentrate new housing in opportunity areas, including Charlton Riverside, is supported by CIS.</p> <p>CIS, however, objects to the Councils proposed housing target of 29,078 additional dwellings</p> <p>(1,939 per year) over the 15 year period 2013 – 2021. The</p>	In order to improve meet housing need it is submitted that the 'Westminster Industrial Estate' should not be retained as a Strategic Industrial Location (SIL) where residential development would be prohibited. This site is a deliverable housing site which is suitable, available and achievable within the plan period.	495566	Mr Thomas Hatch		<a href="#">363</a>

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						<p>London Plan sets a minimum annual housing target for Greenwich Borough of 2,595, which the Authority should seek to exceed. It also states (Policy 3.3 D and Para 3.24) that when planning beyond the London Plan period the London Plan housing target should be rolled forward until a new target is adopted in a replacement London Plan. On this basis the minimum housing target to be exceeded for the Core Strategy should be 38,925.</p> <p>Furthermore, the latest AMR (2011/12) confirms that, despite a significant number of dwellings being permitted, the borough has only delivered 87% of its Housing target for the period 2002/03 to 2011/12, with only 44% being met in the final 3 years. The AMR forecasts a shortfall of 1,720 dwellings on the revised 2011 London Plan target accumulating before adoption of the Core Strategy (2011/12 – 2012/13). The proposed submission version housing target does not take into account this shortfall. Therefore, even if the Councils proposed housing target is used it is submitted that this shortfall should also be included for the target to be considered robust. The delay in delivery has in a large part been due to the Greenwich Peninsula development, the completion rate of which has not met expectations due to the economic downturn.</p> <p>In addition, even with the proposed figure, the latest Housing Trajectory confirms that the Council is still reliant on a windfall allowance (non allocated or permitted) of in excess of 200 dwelling per year and the delivery of 2,300 new homes from the Greenwich Riverside Opportunity Area which is not considered to be deliverable. The proposed target also excludes any allowance for allocated or permitted housing developments stalling, which is particularly concerning given the 2011/12 AMR confirms that in the preceding 10 years only 37.3% of all permitted dwellings have been completed. This issue is only</p>					

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						<p>likely to be exacerbated by current economic climate and its impact on viability.</p> <p>With regard to the Five Year Supply, the latest Housing Trajectory also confirms that if a 20% buffer is included, as per the NPPF given poor historic performance in housing delivery, then</p> <p>following adoption of the Core Strategy the Council would be unable to demonstrate a Full 5 year supply (4.9 Years). If the shortfall of the previous years since adoption of the 2011 London Plan housing target is included, as recent appeals have determined as the correct approach, then the five year supply would drop to 4.42 years. Inspectors have allowed appeals on the basis of only a small 5-year land supply shortfall.</p> <p>Based on this, it is submitted that the proposed submission version Core Strategy does not</p> <p>provide for sufficient housing to meet the housing needs of the borough even if the Councils</p> <p>proposed target it used.</p>					
	Policy H1 New Housing	755935		Not specified	No	<p>RLBG do not have a sufficient five year housing supply and Policy H1 is therefore not</p> <p>consistent with national policy and is unsound. In respect of housing development, the full presumption in favour of sustainable development prescribed by the NPPF should apply.</p> <p>Given the severe shortfall in housing completions and lack of supply, every housing proposal brought forward should be given due consideration in light of this and its crucial contribution to meeting the housing requirement, no matter how small that contribution may be.</p> <p>The above housing issues, combined with the lack of up to date assessment of open space, indicate that consideration should be given to the removal of potential housing sites, such as that of Densitron’s Site, from current designations such as MOL.</p> <p>See full response for further details.</p>		755933	Mr Mark Novelle	Planning Deloitte Real Estate	<a href="#">381</a>
	Policy H1 New Housing	756163	Mr Dionysius	Not specified	No	<p>I consider the Core Strategy and Development Management Plan to be unsound because:-</p> <ul style="list-style-type: none"><li>• It is not consistent with sustainable development</li></ul>	<p>To be sound there is a need to consider contingencies in relation to policies H1 and H3 should the market model for delivering homes continue to fail in Greenwich. These could include</p>				<a href="#">444</a>

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			De Silva			<ul style="list-style-type: none"> <li>• It is not justified by the evidence</li> <li>• It is not deliverable</li> </ul> <p>The core strategy policies H1 and H3 are unsound as the strategy does not meet requirements of national policy to take full account of relevant market and economic signals.</p> <p>While housing targets conform to London Plan and are aspirational, the evidence of delivery of new homes from 2007-12 in Greenwich (where only 43% of the borough's target was met), suggests that these are not realistic and that there is a need to consider alternatives in terms of delivery or at the very least to include a contingency.</p>	handing over public land to community land trusts, to self builders and/ or to co-operative housing organisations, that might successfully deliver in terms of numbers and long-term affordability.				
	Policy H2 Housing Mix	748094	Mr Neil Smith	Yes	No	The policy seeks to require all developments to require a 'significant' proportion of 3, 4 and 4+ bedroom units. There is no definition of the exact meaning of 'significant' proportion and hence this is unhelpful wording and must be deleted from the policy.	Removal of the word 'significant' from the policy.				<a href="#">7</a>
	Policy H2 Housing Mix	629637	Dr Leslie Clark	Yes	No	Policy H2 is not sound as it is not clear how the unmet need for large family-sized homes, will be addressed / delivered.					<a href="#">20</a>
	Policy H2 Housing Mix	634722	Crossrail	Not specified	Not specified	<p>We support the approach of Policy H2 to Housing Mix and agree with the need to determine</p> <p>the exact mix on each site with regards to the location of the development and the character</p> <p>of the surrounding area, as this provides improved flexibility and is likely to assist in the delivery of sustainable growth.</p>		634723	Stephen Harrington	GVA Grimley	<a href="#">90</a>
	Policy H2 Housing Mix	501408	Mr John Franklin	Not specified	No	The targets for housing mixes and sizes and for affordable housing are justified but have not been fully applied in the granting of many recent planning consents by GRB. This does not augur well for the achievement of the targets. It may be argued in defence of recent relaxation of these targets (and of density standards) that this has been necessary as a temporary measure to improve the financial viability of schemes so that they proceed quickly. To the extent that this argument is valid – and developers will always try to reduce planning obligations – further government measures, just announced, to boost effective demand for housing should address this problem and remove the justification for lowering the targets. This is undesirable anyway because of its long-term social consequences.	Strengthen the commitment to implementation of these targets in all applicable cases.				<a href="#">132</a>

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	Policy H2 Housing Mix	148451	Tilfen	No	No	We note that Policy H2 has been updated to reflect our suggestion that it acknowledge that the individual characteristics and circumstances of developments, should be taken into account when determining the housing mix. However, Policy H2 has not been revised to include a test of viability. We remain of the view that this is a relevant criterion in determining housing types and sizes within a development.	A new criteria based approach including viability should be introduced to Policy H2.	382433	Mr Craig Blatchford	Blue Sky Planning	<a href="#">294</a>
	Policy H2 Housing Mix	166965	Berkeley Homes	Not specified	Not specified	<p>We object to the inclusion of a requirement in the policy for developments to include a “significant proportion of 3 and 4+ bedroom units.”</p> <p>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 planning applications.</p> <p>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.</p> <p>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</p>		188419	Mr Bob McCurry	Senior Planner Barton Willmore	<a href="#">401</a>
	Policy H2 Housing Mix	166972	Cathedral Group	Yes	No	<p>Paragraph 50 of the NPPF states that LPAs must plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. Policy H2 of the emerging Core Strategy seeks a significant proportion 3,4 and 4+ bedroom units which paragraph 4.1.9 suggests may be a split of 39% 1 and 2 beds and 61% of 3 and 4 beds. Whilst recognising and welcoming the flexibility in the emerging policy for the exact mix on each site, Cathedral Group has concerns regarding the evidence base used to establish that a significant proportion of family sized units should be delivered on each site.</p> <p>Firstly the South East London Strategic Housing Market Assessment (SHMA) evidence that has been used to set the split does not appear to include 2010 DCLG published</p>	A critical analysis of the SHMA report and evidence needs to be undertaken to identify its weaknesses. Then as a minimum the report needs to be updated to reflect the points set out above. Further, given that the SHMA preceded the 'bedroom tax' changes it is necessary for RGB to now consider how this will impact upon the policy and the indicative mix presented in the supporting text. Without this the evidence base to support the policy is not robust. As such, delivery of the correct mix of dwellings to meet the needs of the social rented sector aspirations of the intermediate and market sectors cannot fully be met.	188810		Nathaniel Lichfield and Partners	<a href="#">476</a>

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						<p>house hold projections as a data source. The most recently published (9 April 2013) interim projections should also be explored to understand how these affect the split being promoted by the Council. This is considered to be a crucial piece of evidence in formulating future housing requirements.</p> <p>Secondly the SHMA uses a 5 year past trends approach to extrapolate the housing requirement for the future. This approach is significantly flawed as it reinforces the status quo. This does not provide for emerging needs and demands but rather reinforces past shortcomings in the delivery of dwellings across Greenwich.</p> <p>Thirdly, there is no recognition to the changes being introduced by the colaition government to introduce a bedroom tax for those renting from social landlords. The aim of the changes are to reduce the under occupancy of dwellings and to this end persuade those who only need smaller units to occupy smaller units to freeing up larger units for those families who need larger units.</p> <p>From this there are significant flaws in the SHMA which suggest that the evidence based is not justified and will not be effective in meeting the needs or the demands of Grenwich residents.</p>					
	Policy H2 Housing Mix	166972	Cathedral Group	Yes	Yes	<p>We support the approach of Policy H2 to Housing Mix and agree with the need to determine</p> <p>the exact mix on each site with regards to the location of the development and the character</p> <p>of the surrounding area, as this provides improved flexibility and is likely to assist in the delivery</p> <p>of sustainable growth.</p>		228178	Ms Diana Thomson	GVA Grimley	<a href="#">461</a>
	Policy H2 Housing Mix	756163	Mr Dionysius De Silva	Not specified	No	<p>I consider the Core Strategy and Development Management Plan to be unsound because:-</p> <ul style="list-style-type: none"><li>• It is not consistent with sustainable development</li><li>• It is not justified by the evidence</li><li>• It is not deliverable</li></ul> <p>Policy H2 is not sound as it is not clear how the unmet need for large family-sized homes, will be addressed or delivered.</p>	Not specified.				<a href="#">446</a>
	Policy H3	748094	Mr	Yes	No	The policy requires developments of over 10 dwellings ofr	The words' at least needs to be deleted from teh				<a href="#">8</a>

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	Affordable Housing		Neil Smith			0.5 hectare to produce 'at least' 35% affordable housing.  The policy wording including the words 'at least' will not encourage residential development rather it will restrain residential development.	policy and replaced with the words 'up to' which would stimulate residential development in the Borough and also reflect London Plan policy 3.12 and the advice contained in the National Planning Policy Framework.				
	Policy H3 Affordable Housing	629637	Dr Leslie Clark	Yes	No	<p>The core strategy policies H1 and H3 are unsound as the strategy does not meet requirements of national policy to take full account of relevant market and economic signals.</p> <p>While housing targets conform to the London Plan and are aspirational, the evidence of delivery of new homes from 2007-12 in Greenwich (where only 43% of the borough’s target was met), suggests that these are not realistic and that there is a need to consider alternatives in terms of delivery or at the very least to include a contingency.</p> <p>Failure to deliver, particularly in relation to genuinely affordable housing (where evidence of need is consistently greatest), will impact detrimentally not just in Greenwich but also in other neighbouring SE London boroughs, areas outside London and indeed on delivery of London-wide housing targets. Only 17%, of the already low delivery of all type of homes, were social rented (over the period 2007-12).</p> <p>The evidence base for policy H3 is weak and out of date and does not provide a current and objectively assess need in the housing market as required by national planning policy. While the Affordable Housing Viability Assessment is recent (updated in December 2012) the SHMA of 2009, is out of date. The SHMA does not take into account:</p> <p>a) 2011 census data;</p> <p>b) the impact of on-going failures to deliver sufficient social-rented homes over the last four / five years;</p> <p>c) the impact of welfare reform, particularly in respect of assumed access to the private-rented sector in Greenwich;</p> <p>d) the number of households that might / might not be able to meet the cost of affordable rent homes (even with access to benefits).</p> <p>There is concern that any failures to deliver genuinely affordable homes, especially in the opportunity areas in the North of the borough, will compromise delivery of London Plan policies that the borough is required to be in general conformity with, including on - mixed and balanced communities, tackling deprivation and inequality and</p>	<p>To be sound, there is a need to consider contingencies in relation to policies H1 and H3 should the market model for delivering homes continue to fail in Greenwich. These could include handing over of public land to community land trusts, to self-builders and / or to co-operative housing organisations, that might successfully deliver in terms of numbers and long-term affordability.</p> <p>To be sound, policy H3 needs to set a clear overall target for delivering affordable homes in addition to including an assertion that at least 35% of homes delivered should be affordable on each site with 10 or more homes or of 0.5 hectares or more in size. We propose that that target should be 50% affordable housing with 70% of this target being social-rented.</p> <p>To be sound, monitoring of targets for delivery of homes should include the tenure of homes across the borough and particularly in the specific opportunity area sites.</p> <p>To be sound, policy H3 needs to include a target for delivery of 4-bedroom and 3-bedroom homes (separately).</p> <p>To be sound policy H3 needs to make strategic reference to addressing older peoples housing needs.</p>			<a href="#">21</a>	

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						<p>sustaining existing stable communities.</p> <p>Policy H3 is unsound since it is not based on a strategy to adequately to meet need. The strategy does not provide a borough target for delivery of affordable homes. The target set, to deliver ‘at least 35%’ on all sites with 10 or more homes or of 0.5 hectares or more, could be seen to be the desirable borough target. This would then be lower than the London Plan target and even with a higher 70% social-rented target (of the affordable homes) this would deliver less social rented homes, than 60% of the London Plan’s affordable housing target; equivalent to ‘at least 41% affordable homes.</p> <p>Policy H3 is unsound since it does not provide the most appropriate strategy informed by an up-to-date evidence base on the specialist housing needs of older persons (sheltered and extra care accommodation, and residential institutions), which the London Plan highlights is ‘expected to experience substantial growth, particularly in outer London’. A strategic reference is required on this in policy H3 as well as having the development policy H (d).</p> <p>Policy H4 is not sound since it fails to provide the most appropriate strategy relating to the accommodation needs of gypsy and travellers or one that is in line with national policy. The 2008 London Gypsy and Traveller Accommodation Needs Assessment identified a need for 22-45 additional pitches to be delivered in Greenwich by 2017. Since the study was conducted no new pitches have been delivered.</p>					
	Policy H3 Affordable Housing	634722	Crossrail	Not specified	Not specified	<p>We recognise the Borough’s preference for the provision of affordable housing on site and</p> <p>support the flexibility in determining the exact level of provision in accordance with the location</p> <p>and the character of the surrounding area. However, we recommend that there should be a</p> <p>specific reference to viability within the policy and also an upper target on the level of provision</p> <p>to provide some certainty for developers. A reference to viability and site specific</p> <p>circumstances should also be made in the supporting text with regards to the tenure mix, so</p> <p>that there is the flexibility to achieve the best outcome for</p>		634723	Stephen Harrington	GVA Grimley	<a href="#">91</a>

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						<p>any particular site, where local characteristics and viability issues may not allow the current policy to be delivered.</p> <p>Furthermore, we would welcome the inclusion of options for delivery off-site and payments in lieu within the policy. This can provide the basis for innovative approaches to the delivery of affordable housing, and enable sites to come forward that may otherwise be unviable when only on-site provision is permissible. Off-site provision by the developer can ensure that affordable housing is actually delivered, providing new homes for those in need, and in some instances, achieving an improved offer to that which can be made on-site due to local constraints.</p>					
	Policy H3 Affordable Housing	147775	Mr Brian Regan	Yes	Yes	<ul style="list-style-type: none"><li>Is the approach taken in Policy H3 that seeks at least 35% affordable housing provision on qualifying sites in general conformity with London Plan policies 3.10, 3.11 3.12 and 3.13?</li></ul>					<a href="#">106</a>
	Policy H3 Affordable Housing	758834	Scotia Gas Networks	Not specified	Not specified	<p>We generally support in principle emerging Policy H3 (affordable housing) which identifies a requirement of providing 35% affordable housing on developments of 10 or more houses or residential sites of 0.5 hectare or more, albeit in respect to the gas holder site there should be some recognition to certain requirements upon SGN to remediate the site which can result in significant costs. The policy wording of H3 is re-provided below:</p> <p>“Developments of 10 or more homes or residential sites of 0.5 hectare or more will be required to provide at least 35% affordable housing. The precise percentage,</p> <p>Page 4</p>		758833	Sophia Waugh	Assistant Planner Quod	<a href="#">121</a>

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						<p>distribution and type of affordable housing will be determined by the particular</p> <p>circumstances and characteristics of the site and of the development.”</p> <p>Additionally, the narrative in support of Policy H3 which identifies a 70% social/affordable rented and 30%</p> <p>intermediate housing tenure spilt is likely to have a further negative impact on the development viability at</p> <p>this site. Noteworthy, the proposed tenure split is not in line with London Plan Policy at 60/40 spilt.</p>					
	Policy H3 Affordable Housing	501408	Mr John Franklin	Not specified	No	The targets for housing mixes and sizes and for affordable housing are justified but have not been fully applied in the granting of many recent planning consents by GRB. This does not augur well for the achievement of the targets. It may be argued in defence of recent relaxation of these targets (and of density standards) that this has been necessary as a temporary measure to improve the financial viability of schemes so that they proceed quickly. To the extent that this argument is valid – and developers will always try to reduce planning obligations – further government measures, just announced, to boost effective demand for housing should address this problem and remove the justification for lowering the targets. This is undesirable anyway because of its long-term social consequences.	Strengthen the commitment to implementation of these targets in all applicable cases.				<a href="#">133</a>
	Policy H3 Affordable Housing	148451	Tilfen	No	No	<p>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 in principle.</p> <p>We note that the explanatory text to Policy H3 continues to states that the affordable housing provision should be split 70:30 social rented: intermediate housing compared with a 60:40 split in the London Plan. We would suggest that Policy H3 is amended to reflect the 60:40 split in the London Plan having regard to the particular characteristics and circumstances, including viability issues.</p> <p>The explanatory text has been further expanded to set out the rented and intermediate housing "costs". Specifically, Paragraph 4.1.13 states:</p>	<p>we suggest the words "of market rent" are inserted after "50 to 80%" in the final sentence. We would also question the meaning of "blend of rental levels" in the context of a specific development proposal.</p> <p>We suggest that paragraph 4.1.14 be revised to align with the London Plan.</p>	382433	Mr Craig Blatchford	Blue Sky Planning	<a href="#">292</a>

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						<p>"While the exact mix and rent levels for affordable rented dwellings in Greenwich will vary between the areas in the Borough, for the majority of the Borough, a rent level set at 80% of market rent would be unaffordable for many of those in need of social housing. The need for all affordable dwellings to be genuinely affordable will be a key consideration for the Council when negotiating rent levels in schemes across the Borough. It is not the Council's intention to prescribe rigid rent levels but, as guidance, the Council will seek affordable rent levels for family sized dwellings (3+ bedrooms) to be at target rents and one and two bedroom dwellings should generally have a blend of rent levels from 50 to 80%, including service charges, and within Local Housing Allowance caps."</p> <p>In our opinion, the Council's intention to seek affordable rent levels for family sized (3+ bedroom) dwellings at target rents is inappropriate, and assert that this should be on the same basis as the proposed blended affordable rent level for 1 and 2 bedroom units (i.e. 50 — 80% market rent). Seeking to align 3+ bedroom rents with potentially lower target rent levels does not conform with National and London Plan policy, may restrict supply on viability grounds (a stated aim of the new affordable housing model is to "maximise delivery of new affordable housing supply") and could skew rent levels such that rental and capital values of 1 &amp; 2 bedroom properties exceed those of 3 &amp; 4 bedroom units — a position that would be difficult to justify to both registered social landlords and tenants.</p> <p>in addition, for clarity we suggest the words "of market rent" are inserted after "50 to 80%" in the final sentence. We would also question the meaning of "blend of rental levels" in the context of a specific development proposal.</p> <p>The explanatory text to Policy H3 also sets out household income thresholds for intermediate housing (Paragraph 4.1.14). It is recognised that qualifying thresholds etc are to set locally however the thresholds at paragraph 4.1.14 are significantly below the London Plan thresholds (upper limits of £61,400 and £74,000 for family housing). We suggest that paragraph 4.1.14 be revised to align with the London Plan.</p>					
	Policy H3 Affordable Housing	166965	Berkeley Homes	Not specified	Not specified	The National Planning Policy Framework (NPPF) places considerable emphasis on the need to ensure that developments are viable and that delivery is not constrained by cumulative policy burdens. We would therefore like 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.		188419	Mr Bob McCurry	Senior Planner  Barton Willmore	<a href="#">402</a>

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						With decreasing amounts of public subsidy available and the introduction of Mayoral Community Infrastructure Levy (CIL) and a CIL for Greenwich, it is increasingly likely that there will need to be detailed discussions between the Council and applicants on development proposals to ensure they remain viable. In order to take account of varying economic circumstances and the need to ensure that development proposals are viable, we recommend that a clause is added to Policy H3 to take account of scheme viability.					
	Policy H3 Affordable Housing	166972	Cathedral Group	Yes	No	<p>Paragraph 50 of the NPPF states that "Such [affordable housing] policies should be sufficiently flexible to take account of changing market conditions over time".</p> <p>The wording of policy H3 does not provide this flexibility. At the moment, the policy is worded so that at least 35% is to be provided. The supporting paragraph (4.1.11) suggests that this could be higher for example of employment sites where up to 60% of affordable housing may be deliverable, quoting the Affordable Housing Viability Assessment July 2011 (AHVA). This infers that the affordable housing requirement will not be adjusted downwards, for example, to reflect adverse market conditions or where other associated costs such as remediation affect viability and the ability to provide affordable housing, despite a requirement to do so by the NPPF.</p> <p>In terms of effectiveness, the AHVA study goes on to state, "...it should be stressed that affordable housing policies must be applied sensitively, taking full account of individual site circumstances, including financial viability, and especially where exceptional costs arise, such as in remediating contaminated sites". Unsatisfactorily, this recognition is not explicitly set out within the emerging Core Strategy policy or its supporting text (for example in 4.1.11) — again it focuses on increasing the percentage rather than recognising that some circumstances may require the delivery of a smaller number of affordable dwellings in order to deliver other planning benefits to the authority in line with other core strategy objectives and policies.</p> <p>Further, the AHVA is explicit that the study was not required to anticipate any community infrastructure levy payments that may be required. Paragraph 2.1 of the AHVA states that "we have, however, sought to ensure that the policy recommendations are reflective of longer term housing market trends, rather than focusing on the current /ow point in the cycle, as Core Strategy inspectors have</p>	The policy needs to be amended to be consistent with national policy. The change should recognise that there is a target of 35% will be sought and where possible, higher levels of affordable housing should be provided. Development of 10 or more dwellings should deliver 35% affordable housing subject to viability.	188810		Nathaniel Lichfield and Partners	<a href="#">477</a>

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						<p>emphasised in their reviews, and similarly by the Secretary of State in recent appeals. As will become clear, we have taken account as far as is practicable, of all these variables in carrying out this study".</p> <p>The updated report (December 2012) does not take account of the introduction of the Mayor's CIL in April 2012 and how this impacts upon the viability scenarios tested by the Borough's consultants.</p> <p>Further there will be schemes that come forward after the introduction of RBG's CIL but before the housing market picks up. The wording of the policy does not allow for reductions to the 35% contribution and thus will not be effective in supporting the delivery of new dwellings across the Borough — particularly on those sites which have been included to meet strategic aspirations of RBG.</p> <p>Notwithstanding these important objections, Cathedral Group welcomes the ability to determine the precise percentage, distribution and type of affordable housing based upon the circumstances and characteristics of the site and of the development, but clarification is required within Policy H3 to acknowledge that viability information will be required to justify provision which is below 35%.</p>					
	Policy H3 Affordable Housing	167326	Mayor of London	Not specified	No	<p>The Council has set a policy target that at least 35% of additional housing, of 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. This has been backed up with an affordable housing viability assessment. This is acceptable.</p> <p>The Council proposes a 70/30 affordable rented or social rented/ intermediate split as opposed to the 60/40 split set out in the London Plan. The Council has set out evidence that this better meets its needs. This is acceptable.</p> <p>The Council sets out that for the majority of the borough affordable rent levels of 80% of market rent will be unaffordable. It sets out that affordable rent levels for family size dwellings should generally be at target rents and those for one and two bedroom dwellings should have blend of rents from 50-80%.</p> <p>Rent caps should not be set in Core Strategies for affordable rented housing; although the Council says it is not setting rent levels. The levels quoted are obviously intended to be used as a hook for negotiating lower rents, which could impact on maximisation and thus is not in conformity with the London Plan. The text should be amended as follows:</p>				<a href="#">163</a>	

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						<p>‘The Mayor has set a pan-London average investment monitoring benchmark for affordable rents at 65% of market rent across the programme as a whole, taking into account the need to provide family-sized housing at a lower proportion of market rents.’ The London Plan, Housing SPG and the Revised Minor Early Alterations to the London Plan emphasise that the priority for affordable housing is maximising supply, having regard to the availability of resources and that if boroughs adopt planning policies that seek to set caps below 80% or set rents for different property sizes of affordable rent, they would not be in general conformity with the London Plan.</p> <p>The Council sets lower income ranges for intermediate products than that set out in the London Plan and this is acceptable.</p>					
	Policy H3 Affordable Housing	502660	LXB Retail Properties PLC	Not specified	No	<p>The Core Strategy proposes 30% affordable housing for all developments of 10 or more homes or residential sites of 0.5 hectare or more. The supporting text indicates that where sites of low existing use values are subject to redevelopment proposals, such as employment sites, then up to 60% affordable housing may be deliverable. Without a more thorough assessment on the viability of such a proposal on the development of Charlton Riverside, this quantum of affordable housing may not be achievable or create a long term viable and sustainable community. The inclusion of this figure, without supporting evidence, is unsound.</p>		445293	Mary Davidson	WYG Planning	<a href="#">276</a>
	Policy H3 Affordable Housing	745440	Ms Sharon Hayward	Not specified	No	<p>The policy is unsound because: it is not positively prepared or justified.</p> <p>The evidence base is weak. While the Affordable Housing Viability Assessment is recent (updated in December 2012), the 2009 SHMA is out of date; it does not take into account -</p> <p>a) 2011 census data;</p> <p>b) the impact of on-going failures to deliver sufficient social-rented homes, in Greenwich and other SE London boroughs, over the last four / five years; (delivery of social rented homes in Greenwich was only 17% of the total homes delivered from 2007-12)</p> <p>c) the impact of welfare reform, particularly in respect of assumed access to the private-rented sector in Greenwich covered by housing benefit;</p> <p>d) the number of households that might / might not be able</p>	<p>To ensure this policy is sound and evidence based, an overall borough target should be set for 50% affordable housing with a 70% target for social-rented homes, in addition to it stipulating that at least 35% of affordable homes are delivered on every site.</p> <p>There should be full monitoring of delivery of all types of affordable homes (separately) in the opportunity areas and area of intensification.</p> <p>A new SHMA is required, as already highlighted above.</p>				<a href="#">325</a>

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						<p>to meet the cost of affordable rent homes (even with access to benefits).</p> <p>There is concern that any failures to deliver genuinely affordable homes, especially in the opportunity areas in the North of the borough, will compromise delivery of London Plan policies that the borough is required to be in general conformity with, including on - mixed and balanced communities, tackling deprivation and inequality, and sustaining existing stable communities.</p> <p>The policy is not based on a strategy that will meet the need for genuinely affordable homes. The target set for affordable homes is far lower than is assessed as being required, even from an out-of-date SHMA. The target then for market homes is higher than evidence suggests is needed (particularly taking into account the impact of welfare reform policy changes in respect of private renting).</p> <p>The target set - to deliver ‘at least 35%’ on all sites with 10 or more homes or of 0.5 hectares or more, could be seen to be the borough target (even though there is mention in the supporting text that some sites could deliver higher percentages of affordable homes).</p> <p>If 35% is seen as the target, even with a higher percentage target for social rented homes, (of 70%) this would actually result in less social-rented homes than would be delivered with 60% of the higher London Plan affordable housing target (equivalent to 41% of the total housing target).</p>					
	Policy H3 Affordable Housing	166972	Cathedral Group	Yes	No	<p>Viability is also a key consideration for future development and this should be reflected throughout the Core Strategy and Development Management Policies document. To avoid restricting the delivery of new development, the viability of the development should be assessed on a site specific basis. Where a less flexible approach is taken, this may have significant implications for development coming forward. The costs incurred through the planning process have a direct influence on the amount, quality and use of land coming forward and could potentially inhibit development proposals, which would otherwise have a positive impact for the Borough. We consider that viability and deliverability are not given sufficient weight in the current drafting of the document and this risks sufficient development in Greenwich not coming forward to maintain the Borough’s important role in London’s growth. We recognise the Borough’s preference for the provision of affordable housing on site and</p> <p>support the flexibility in determining the exact level of</p>	<p>We recommend that an additional paragraph / section is included within the ‘Implementation’ section to reflect the importance of viability and, particularly, the requirement for development to provide competitive returns to a willing land owner and willing developer to enable the development to be delivered.</p> <p>However, we recommend that there should be a specific reference to viability within the policy and also an upper target on the level of provision to provide some certainty for developers. A reference to viability and site specific</p> <p>circumstances should also be made in the supporting text with regards to the tenure mix, so that there is the flexibility to achieve the best outcome for any particular site, where local characteristics and viability issues may not allow the current policy to be delivered. Furthermore, we</p>	228178	Ms Diana Thomson	GVA Grimley	<a href="#">462</a>

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						provision in accordance with the location and the character of the surrounding area.	would welcome the inclusion of options for delivery off-site and payments in lieu within the policy. This can provide the basis for innovative approaches to the delivery of affordable housing, and enable sites to come forward that may otherwise be unviable when only on-site provision is permissible. Off-site provision by the developer can ensure that affordable housing is actually delivered, providing new homes for those in need, and in some instances, achieving an improved offer to that which can be made on-site due to local constraints, in short, providing better outcomes.				
	Policy H3 Affordable Housing	500348		Not specified	Not specified	Draft policy H3 relates to affordable housing and states that ‘the precise percentage, distribution and type of affordable housing will be determined by the particular circumstances and characteristics of the site and of the development.’ Policy 3.12 of the London Plan (2011) states that affordable housing negotiations on sites ‘should take account of their individual circumstances including development viability.’ Therefore, draft policy H3 should be amended to clearly refer to development viability as one of the circumstances which will be considered by the Council when negotiating affordable housing contributions.		761295	Sam Hine	DP9	<a href="#">413</a>
	Policy H3 Affordable Housing	756163	Mr Dionysius De Silva	Not specified	No	<p>I consider the Core Strategy and Development Management Plan to be unsound because:-</p> <ul style="list-style-type: none"><li>• It is not consistent with sustainable development</li><li>• It is not justified by the evidence</li><li>• It is not deliverable</li></ul> <p>Policy H3 is unsound, since it is not based on a strategy to adequately to meet need. The strategy does not provide a borough target for delivery of affordable homes. The target set to deliver 'at least 35%' on all sites with 10 or more homes or of 0.5 hectares or more, could be seen to be the desirable borough target. This would then be lower than the London Plan target and even with a higher 70% social-rented target (of the affordable homes) this would deliver less social-rented homes, than 60% of the London Plan's affordable housing target, equivalent to at least 41% affordable homes.</p>	<p>To be sound there is a need to consider contingencies in relation to policies H1 and H3 should the market model for delivering homes continue to fail in Greenwich. These could include handing over public land to community trusts, to self builders and/ or to co-operative housing organisations, that might successfully deliver in terms of numbers and long-term affordability.</p> <p>To be sound, policy H3 needs to set a clear overall target for delivering affordable homes in addition to including an assertion that at least 35% of homes delivered should be affordable on each site with 10 or more homes or of 0.5 hectares or more in size. I propose that, that target should be 50% affordable housing with 70% of this target being social-rented. The policy further needs to include a target for delivery of 4-bedroom and 3-bedroom homes (separately). Policy H3 also needs to make strategic reference to addressing older peoples housing needs.</p> <p>To be sound the housing section needs to include reference to the London Plan policies relating to Lifetime Neighbourhoods.</p>				<a href="#">447</a>
	Policy H3	756674		Yes	No	The current wording of Policy H3 requires at least 35%	The policy should be reworded to be consistent	75667	Mrs	Associate	<a href="#">445</a>

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	Affordable Housing					<p>affordable housing to be provided and does not provide for any flexibility below this figure. It is therefore not consistent with the NPPF (Para 50) which states that such policies should be sufficiently flexible to take account of changing market conditions over time.</p> <p>The policy should recognise that some schemes may require the delivery of a smaller proportion of affordable dwellings to reflect adverse market conditions or site specific circumstances such as financial viability. The RBG Affordable Housing Viability Assessment (July 2011 - Updated December 2012) states:</p> <p>"...It should be stressed that affordable housing policies must be applied sensitively, taking full account of individual site circumstances, including financial viability..."</p> <p>The Policy therefore needs to be amended to acknowledge that viability information will be required to justify affordable housing provision which is below 35%</p>	with national policy recognising that developments of 10 or more homes or residential sites of 0.5 hectares or more should deliver 35% affordable housing subject to viability.	1	Sarah Moorhouse	Director Nathaniel Lichfield & Partners	
	Policy H3 Affordable Housing	760213	Irene Kandali	Not specified	No	I consider Policy H3 to be unsound because it does not provide an appropriate strategy informed by an up to date evidence based reference to the specialist housing needs of older persons with regard to sheltered accommodation, extra care accommodation and residential institutions which the London Plan highlighted as expecting to experience substantial growth. A strategic reference is required on this for Policy H3 and also the Development Policy H(d).	To make Policy H3 sound strategic references need to be made addressing the housing needs of older people and it is essential that new housing assessments are carried out to update the Core Strategy in the near future and should also make clear evidence based recommendations, relating to the housing needs of older persons.				<a href="#">347</a>
	Policy H4 Gypsy and Traveller Needs	629637	Dr Leslie Clark	Yes	No	Policy H4 is not sound since it fails to provide the most appropriate strategy relating to the accommodation needs of gypsy and travellers or one that is in line with national policy. The 2008 London Gypsy and Traveller Accommodation Needs Assessment identified a need for 22-45 additional pitches to be delivered in Greenwich by 2017. Since the study was conducted no new pitches have been delivered.	<p>To be sound, policy H4 should include targets to meet the needs identified in the 2008 London Gypsy and Traveller Accommodation Needs Assessment.</p> <p>It is essential that a new housing needs assessment is carried out, at the very least to update the core strategy in the near future. The study should also make clear evidence-based recommendations relating to the housing needs of older people and should identify any additional sites identified over and above those identified in the 2008 London Gypsy and Traveller Accommodation Needs Assessment.</p>				<a href="#">22</a>
	Policy H4 Gypsy and Traveller Needs	147775	Mr Brian Regan	Yes	Yes	• Should Policy H4 remove the reference to a cross boundary DPD, or at least identify the neighbouring boroughs that will be involved in a joint DPD? This is because Lewisham has already embarked upon the preparation of a Gypsy and Traveller Site Local Plan and the London Borough of Greenwich have previously stated					<a href="#">105</a>

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						that a cross-boundary DPD between Lewisham and Greenwich is not needed.					
	Policy H4 Gypsy and Traveller Needs	537756	Mr Richard Lee	Not specified	No	<p>This policy is unsound since it does not meet the Planning Policy for Traveller Sites requirements to set pitch targets based on a robust evidence of need and identify a 5-year supply of deliverable sites.</p> <p>The approach set out in Policy H4 is insufficiently justified, as it does not take into account the evidence given in the 2008 London Gypsy and Traveller Accommodation Needs Assessment (GTANA). This study identified a need for 22-45 additional pitches to be delivered in Greenwich by 2017.</p> <p>Furthermore, we do not consider that criteria ii. and iii. for assessing new sites are in line with the requirements of the Planning Policy for Traveller Sites paragraph 11. These criteria are unduly restrictive and unlikely to promote and maximise Gypsy and Traveller site provision.</p> <p>To be sound, the policy must set a target to deliver 22-45 additional pitches by 2017 and identify a 5 year supply of land.</p>				<a href="#">254</a>	
	Policy H4 Gypsy and Traveller Needs	706487	Miss Ilinca Diaconescu	Not specified	No	<p>We are concerned that Policy H4 Gypsy and Traveller Needs is unsound since it does not meet the Planning Policy for Traveller Sites requirements to set pitch targets based on a robust evidence of need and identify a 5-year supply of deliverable sites.</p> <p>The approach set out in Policy H4 is insufficiently justified, as it does not take into account the evidence given in the 2008 London Gypsy and Traveller Accommodation Needs Assessment (GTANA). This study identified a need for 22-45 additional pitches to be delivered in Greenwich by 2017. We wish to point out that since the 2008 London GTANA was conducted, no new sites have been provided in Greenwich, meaning that the need has not decreased.</p> <p>In addition to the GTANA, Greenwich Council maintains a site waiting list which currently registers 13 households.</p> <p>Given that the accommodation needs of Gypsies and Travellers are clearly evidenced, we consider that Policy H4 does not provide a fair and effective strategy for meeting the needs of this community, as required by the Planning Policy for Traveller Sites.</p> <p>Furthermore, we do not consider that criteria ii. and iii. for assessing new sites are in line with the requirements of the Planning Policy for Traveller Sites paragraph 11. These criteria are unduly restrictive and unlikely to promote and</p>	<p>Criteria ii and iii should be removed from Policy H4 to ensure conformity with the principles of the Planning Policy for Traveller Sites.</p> <p>In addition, a number of changes are necessary for Policy H4 to be sound and compliant with national planning policy.</p> <p>First of all, the policy must set a target to deliver 22-45 additional pitches by 2017, as identified in the 2008 London GTANA. After 2017, the accommodation needs of Gypsies and Travellers should be assessed together with the wider housing needs. The site waiting list should also be considered a primary source of evidence and inform the Council’s policy approach.</p> <p>In updating the needs assessment and identifying the 5-year supply of land, the Council must collaborate with neighbouring Boroughs, the Gypsy an Traveller community and support organisations, as required by the Duty to Cooperate defined in paragraphs 178-181 of the NPPF and paragraph 6 of the PPTS. The policy text should include a commitment to work collaboratively with the community and representative bodies.</p>			<a href="#">319</a>	

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						maximise Gypsy and Traveller site provision. They would not be applied to other types of land use, especially residential, as they would thwart development.					
	Policy H4 Gypsy and Traveller Needs	745440	Ms Sharon Hayward	Not specified	No	The policy is unsound because: it fails to provide the most appropriate strategy relating to the accommodation needs of gypsy and travellers or one that is in line with national policy. The 2008 London Gypsy and Traveller Accommodation Needs Assessment identified a need for 22-45 additional pitches to be delivered in Greenwich by 2017. Since the study was conducted no new pitches have been delivered.	To be sound, policy H4 should include targets to meet the needs identified in the 2008 London Gypsy and Traveller Accommodation Needs Assessment.  It is essential that a new housing needs assessment/ SHMA is carried out, at the very least to update the core strategy in the near future.				<a href="#">327</a>
	Policy H5 Housing Design	629637	Dr Leslie Clark	Yes	No	<p>Policy H5 is not sound since reasonable alternatives would include reference to new London Plan (and November 2012 Housing SPG) policies on space standards and internal and / or external storage areas.</p> <p>Policy H5 is unsound. It fails to provide equality of access to wheelchair users to all flats regardless of floor level.</p> <p>Given the high demand for family-sized homes section Policy H5 (vi) is likely prohibitive to delivering the numbers of family homes required in the borough. While it is essential that families with children to have good access to green and play space within housing developments, communal gardens and play areas can be adequate and more positive in terms of children's social engagement.</p>	<p>To be sound policy H5 needs to include reference to space standards and internal and / or external storage areas contained in the London Plan and London Plan Housing SPG (November 2012).</p> <p>Policy H5 should state that homes with two or more storeys (rather than three and more) are required to have sufficient lifts (to ensure equality of access for wheelchair users to all homes and to those of friends and family).</p> <p>To be sound policy H5 needs to be consistent with the intention of policy H2 to deliver desperately needed large family-sized homes. It would be better to say 'Family housing should have 'direct access to garden and play areas'.</p> <p>To be sound the housing section needs to include reference to the London Plan policies relating to Lifetime Neighbourhoods.</p>				<a href="#">23</a>
	Policy H5 Housing Design	634722	Crossrail	Not specified	Not specified	<p>The Mayor has now adopted the Housing SPG and therefore all references to the London</p> <p>Housing Design Guide should be removed. Consistency between the Housing SPG and the</p> <p>Core Strategy with Development Management Policies is noted and supported. Furthermore,</p> <p>we support the Borough's approach to density and the recognition of local characteristics as</p> <p>the defining factor, as this encourages the most sustainable use of the land.</p>		634723	Stephen Harrington	GVA Grimley	<a href="#">92</a>
	Policy H5 Housing Design	147775	Mr Brian	Yes	Yes	<ul style="list-style-type: none"> <li>Should Policy H5 refer to the need for new homes to achieve code level 6 by April 2016, as it currently only seeks new homes to achieve at least code level 4?</li> </ul>					<a href="#">107</a>

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			Regan								
	Policy H5 Housing Design	148451	Tilfen	No	No	We note the changes to Policy H5 which sets out the design aims for all housing development. In principle, Tilfen Land remains supportive of the Council's aspirations for high design quality and sustainability credentials. However, they remain of the view that an over-arching viability and practicality criteria should be introduced 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. A key factor in any viability appraisal will be the construction costs and in this regard, inter alia, the inclusion of a lift in all residential developments of three or more storeys (x) will add significantly. It is Tilfen land's view that a lift is not required in all residential developments of 3 or more storeys. Furthermore, we note that the Mayor's Interim Edition of the London Housing design Guide states "as a rule, at/least one lift per core should be provided in all blocks of flats where any dwellings are entered on or above the fourth floor (fifth storey), measured from the main entrance level. Lift provision at the third floor (fourth storey) is desirable...".	Therefore, we respectfully suggest that Policy H5, (x) is revised as follows:  "New build developments of flats that are five or more storeys will be required to have sufficient lift (s). Lift provision in new build developments of four storeys or more is desirable"	382433	Mr Craig Blatchford	Blue Sky Planning	<a href="#">293</a>
	Policy H5 Housing Design	148486	Ms Wendy Shelton	Not specified	Not specified	Policy H5 Housing Design - object to the fact that the H5(i) no longer contains a progressive level of achievement from Code level 4 by 2011, Code level 5 by 2013 and Code level 6 by 2016. The revised wording For new build homes the achievement of Code for Sustainable Homes at least code level four (4) is insufficiently robust and it fails to include the previous reference that the requirement applies to new residential development by both housing associations and private developers.					<a href="#">213</a>
	Policy H5 Housing Design	166965	Berkeley Homes	Not specified	Not specified	With regards to Part II of Policy H5, the Mayor has now published his Housing SPG. The reference should therefore be updated to the Mayors Housing Supplementary Planning Guidance (November 2012). Paragraph 4.1.25 should also be updated so it is aligned with the Mayors Housing SPG.  Part iv (and paragraph 4.1.27) – 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. Furthermore, just because a proposed flat might be north facing and single aspect, it does not automatically mean that it cannot meet all other policy objectives and still provide a high quality new dwelling.		188419	Mr Bob McCurry	Senior Planner Barton Willmore	<a href="#">403</a>

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						Part (iv) of Policy H5 should therefore be amended to include the words “where possible” at the end of the sentence.					
	Policy H5 Housing Design	167229	Ms Lucy Owen	Yes	No	The policy and supporting text refer to utilising design and layout to achieve acceptable levels of noise in development. It is also recognised that developments next to safeguarded wharves are particularly vulnerable. Whilst this reference is welcomed, the juxtaposition issues relating to developments located in close proximity to safeguarded wharves are not limited to solely noise/vibration. Air quality/dust, lighting and highways access are also important and design and layout can play an important role in mitigating these impacts	Widen the scope of policy H5 and para 4.1.26 to make it clear that new housing development and conversions should incorporate in the design and layout, protection against noise and/or vibration, air quality/dust, lighting and highways access to preserve the amenity of future residents				<a href="#">231</a>
	Policy H5 Housing Design	745440	Ms Sharon Hayward	Not specified	No	<p>The policy is unsound because: it does not include reference to the London Plan 2011, or the November 2012 Housing SPG policies on space standards and internal and / or external storage areas.</p> <p>It also fails to set a provision for equality of access to wheelchair users to all flats, regardless of floor level.</p> <p>Section (vi) is likely prohibitive in terms of delivering the numbers of family homes in the borough and is thus not positively prepared to meet objectively assess requirements.</p> <p>While it is essential that families with children have good access to green and play space; both communal gardens and play areas can be adequate and also more positive in terms of providing safe spaces for social engagement of children and their families.</p>	<p>The changes I am seeking are: To ensure this policy is sound, it should</p> <ul style="list-style-type: none"><li>• reference the London Plan and the London Plan SPG 2012 policies on space standards and internal and external storage spaces</li><li>• provide equality of access for wheelchair users to all homes, including those of friends and family, through a requirement to have sufficient lifts in buildings with two or more storeys (rather than three)</li></ul> <p>In addition, H5 should be consistent with policy H2 in its aim to deliver desperately needed large family-sized homes. It would be better to say - Family housing should have ‘direct access to garden and play areas’ rather than ‘Family housing should normally have direct access to a private garden.’</p>				<a href="#">329</a>
	Policy H5 Housing Design	166972	Cathedral Group	Yes	No	<p>Cathedral Group raises two concerns regarding the housing design criteria:</p> <p>1). The policy suggests a presumption against single aspect north facing units and a presumption in favour of dual aspect units. Whilst there is a degree of flexibility available within this wording, greater weight should be given to site specific circumstances and specific daylight analysis for individual proposals. This should be reflected within the policy.</p> <p>2). The policy suggests that family housing should normally have direct access to a private garden. Again there should be greater recognition to site specific circumstances and the details of the proposal. Factors would include access to</p>	<p>With regards single aspect north facing units the policy should be worded to explicitly support site specific anaylsis and circumstances. The suggested wording for this would be:</p> <p>'Seek to avoid single aspect north facing units and a preference for dual aspect units. This must be based on site specific circumstances.'</p>	188810		Nathaniel Lichfield and Partners	<a href="#">505</a>

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						communal open space, access to other amenity facilities and balance of other planning facotrs e.g. maximising the use of land in the waterfront areas in line with other policies within the document.					
	Policy H5 Housing Design	166972	Cathedral Group	Yes	No	The Mayor has now adopted the Housing SPG and therefore all references to the London Housing Design Guide should be removed. Consistency between the Housing SPG and the Core Strategy with Development Management Policies is noted and supported. Furthermore, we support the Borough's approach to density and the recognition of local characteristics as the defining factor, as this encourages the most sustainable use of the land. We also support the introduction of a 25 unit threshold for the provision of wheelchair housing as this provides for greater flexibility for smaller development proposals and thus should enable greater housing growth. However, we do not support the requirements for dwellings to provide a minimum garden area of 50 sqm, with an additional 15 sqm provided for each additional bedroom.	There should be greater flexibility within this policy to take account of site specific circumstances and local provision. Provision on-site may not be required where the location already benefits from good provision of open space locally, or may not be possible due to site constraints, where qualitative innovation may be capable of meeting need. In this instance, a lower level may be agreed upon, or a payment towards provision off-site may be more appropriate.	228178	Ms Diana Thomson	GVA Grimley	<a href="#">463</a>
	Policy H5 Housing Design	756674		Yes	No	<p>Policy H5 sets out a number of criteria the Council expect residential development to meet, Bengrove Investments Ltd has concerns regarding two of these criteria as set out below:</p> <p>CRITERION IV,</p> <p>THE CRITERION STATES THERE IS A PRESUMPTION AGAINST SINGLE-ASPECT NORTH FACING UNITS AND A PRESUMPTION IN FAVOUR OF DUAL ASPECT UNITS, BENGROVE CONSIDER GREATER WEIGHT SHOULD BE GIVEN TO SITE SPECIFIC CIRCUMSTANCES INCLUDING DAYLIGHT AND SUNLIGHT ANALYSIS AND THERE SHOULD BE MORE FLEXIBILITY IN THE CRITERA TO REFLECT THIS.</p> <p>CRITERION VI.</p> <p>THE CRITERION STATES THAT FAMILY HOUSING SHOULD NORMALLY HAVE DIRECT ACCESS TO A PRIVATE GARDEN. AS WITH CRITERION IV, BENGROVE CONSIDER GREATER WEIGHT SHOULD BE GIVEN TO SITE SPECIFIC CIRCUMSTANCES INCLUDING ACCESS TO COMMUNAL OPEN SPACE AND OTHER AMENTITY FACILITIES.</p>	<p>THE POLICY SHOULD BE AMENDED TO TAKE ACCOUNT OF SITE SPECIFIC CIRCUMSTANCES. THE SUGGESTED WORDING FOR THIS WOULD BE:</p> <p>CRITERION IV.</p> <p>"SEEK TO AVOID SINGLE-ASPECT NORTH FACING UNITS AND A PREFERENCE FOR DUAL ASPECT UNITS. FLEXIBILITY WILL BE ALLOWED TAKING INTO ACCOUNT SITE-SPECIFIC CIRCUMSTANCES".</p> <p>CRITERION VI.</p> <p>"...THE PROVISION OF PRIVATE GARDENS FOR FAMILY HOUSING SHOULD BE SOUGHT WHERE CIRCUMSTANCES ALLOW."</p>	756671	Mrs Sarah Moorhouse	Associate Director Nathaniel Lichfield & Partners	<a href="#">448</a>
	Policy IM(a) Impact on the Road	630863	Transport for London	Not specified	Not specified	<p>TfL note proposals to promote the implementation of traffic calming measures</p> <p>on roads in RB Greenwich. In response to this, TfL request</p>					<a href="#">74</a>

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	Network					that the needs of all  road users are considered in the design of these measures, particularly buses  to ensure that the public transport accessibility of areas is not undermined by  highway design. TfL wish to advise RB Greenwich of the Traffic Calming  Measures for Bus Routes Technical Note, which provides more information on  this matter.					
	Policy IM(a) Impact on the Road Network	148036	Ms Jenny Bates	Not specified	No	We also object to Development Management Policies IM(a) Impact on the Road Network and Policy IM(b) Walking and Cycling  To be sound IM(a) needs to not be expected to add to traffic, and hence to worse congestion and air pollution, and IM(b) needs to have targets for modal share for trips by walking and cycling commensurate with targets to cut traffic levels by,  which in turn need to be commensurate with meeting climate change targets and air pollution limits.  TfL are proposing 2 new crossings for vehicles - both of which would have their southern end in Greenwich.  1 is for a 4 lane new Silvertown road tunnel by Blackwall's existing 4 lanes  2 is for a vehicle ferry at Gallions Reach or (either after a ferry or instead of it) a 'fixed link' ie road bridge or tunnel (which would replace the woolwich ferry, though replacing the Woolwich ferry itself was also consulted on)  <a href="https://consultations.tfl.gov.uk/rivercrossings/consultation">https://consultations.tfl.gov.uk/rivercrossings/consultation</a>  Gallions Reach is where the previous Thames Gateway road bridge (TGB) was defeated (and the ELRC going through Oxleas Wood before that)  <a href="http://www.foe.co.uk/resource/press_releases/thames_gateway_road_bridge_06112008.html">http://www.foe.co.uk/resource/press_releases/thames_gateway_road_bridge_06112008.html</a>  The Public Inquiry into the TGB showed that TfL and the Mayor's claims about regeneration did not stand up (ie				<a href="#">433</a>	

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						<p>giving evidence that such road crossings are not critical to regeneration) - but that it would have added to climate change, air pollution and increased accidents (and meant fewer people walking and cycling &amp; using public transport).</p> <p>Also, as TfL admitted, it would generate new traffic - and the problems from that include, as the Inspector said, that it would be "likely to cause increased congestion".</p> <p>The inspector's report from the 2005-06 public inquiry found that:</p> <ul style="list-style-type: none"><li>• regeneration benefits do not "substantially outweigh" "the disbenefits of the scheme in terms of increased traffic, reduced safety, increased air pollution, and a shift against walking, cycling and public transport in favour of the private car" (9.422)</li><li>• the "whole justification of the TGB is based not on reducing the need to travel, but on increasing it" (9.145), that it "would facilitate commuting by car" (9.146) and be "likely to cause increased congestion" (9.187)</li><li>• the scheme would "result in a negative contribution to the Government's commitment to reducing greenhouse gases" (9.427)</li><li>• of air quality being made worse as a result of the TGB: "in an area in which air quality has historically been low, and where it is identified as a current problem, I do not regard that as acceptable" (9.416).</li></ul> <p>If a new piece of road is built and that makes it easier for people now to drive, then new vehicle journeys are created as some people switch from eg taking the bus and others make new trips.</p> <p>More traffic would mean WORSE congestion overall around the area of the new crossings - as all the extra vehicles would have to get to and from the ends of the new crossings.</p> <p>TfL would have to toll the new crossings as well as the existing Blackwall tunnel - but this does not help:</p> <p>-if TfL tolled so heavily there was no extra traffic at all then why spend millions of pounds? If the crossings managed to re-distribute the existing congestion (and helped the existing Blackwall problem) then that could be done without building new roads/vehicle crossings.</p>					

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						<p>-if TfL did allow even a bit more traffic (which would be expected as TfL see that as a benefit to regeneration) then that extra traffic would mean worse congestion in the area around and worse air pollution.</p> <p>The Mayor and TfL, and Greenwich, are not prepared to take the action needed now to cut traffic levels and tackle air pollution, so we can't afford to make it harder by adding to the problem.</p> <p>Further information on Friends of the Earth's views on the river crossings - after comments on the process, there are comments on the issues.</p> <p><a href="http://stopcityairportmasterplan.tumblr.com/post/44616122230/friends-of-the-earth-river-crossings-response">http://stopcityairportmasterplan.tumblr.com/post/44616122230/friends-of-the-earth-river-crossings-response</a></p> <p>TfL have recently published the results of their recent consultation, claiming support, but these results apparently showing public support cannot be taken as any such thing - people responding had very little to go on and may have got the impression from TfL that they would help with congestion, when in fact resulting extra traffic would add to congestion in the wider area around the new road crossings (but the implications for eg air pollution were not set out).</p>					
	Policy IM(b) Walking and Cycling	630863	Transport for London	Not specified	Not specified	<p>TfL welcomes the proposals which ensure that development in the Borough</p> <p>provides sufficient provision of changing and shower facilities for cyclists.</p>					<a href="#">75</a>
	Policy IM(b) Walking and Cycling	147775	Mr Brian Regan	Yes	Yes	<p>• Should Policy IM(b) acknowledge the need to link up the footpath and cycle networks in Greenwich with the networks that exist in neighbouring boroughs, including Lewisham?</p>					<a href="#">114</a>
	Policy IM(b) Walking and Cycling	148036	Ms Jenny Bates	Not specified	No	<p>We also object to Development Management Policies IM(a) Impact on the Road Network and Policy IM(b) Walking and Cycling</p> <p>To be sound IM(a) needs to not be expected to add to traffic, and hence to worse congestion and air pollution, and IM(b) needs to have targets for modal share for trips by walking and cycling commensurate with targets to cut traffic levels by,</p> <p>which in turn need to be commensurate with meeting climate change targets and air pollution limits.</p> <p>TfL are proposing 2 new crossings for vehicles - both of</p>					<a href="#">434</a>

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						<p>which would have their southern end in Greenwich.</p> <p>1 is for a 4 lane new Silvertown road tunnel by Blackwall's existing 4 lanes</p> <p>2 is for a vehicle ferry at Gallions Reach or (either after a ferry or instead of it) a 'fixed link' ie road bridge or tunnel (which would replace the woolwich ferry, though replacing the Woolwich ferry itself was also consulted on)</p> <p><a href="https://consultations.tfl.gov.uk/rivercrossings/consultation">https://consultations.tfl.gov.uk/rivercrossings/consultation</a></p> <p>Gallions Reach is where the previous Thames Gateway road bridge (TGB) was defeated (and the ELRC going through Oxleas Wood before that)</p> <p><a href="http://www.foe.co.uk/resource/press_releases/thames_gateway_road_bridge_06112008.html">http://www.foe.co.uk/resource/press_releases/thames_gateway_road_bridge_06112008.html</a></p> <p>The Public Inquiry into the TGB showed that TfL and the Mayor's claims about regeneration did not stand up (ie giving evidence that such road crossings are not critical to regeneration) - but that it would have added to climate change, air pollution and increased accidents (and meant fewer people walking and cycling &amp; using public transport).</p> <p>Also, as TfL admitted, it would generate new traffic - and the problems from that include, as the Inspector said, that it would be "likely to cause increased congestion".</p> <p>The inspector's report from the 2005-06 public inquiry found that:</p> <ul style="list-style-type: none"><li>• regeneration benefits do not "substantially outweigh" "the disbenefits of the scheme in terms of increased traffic, reduced safety, increased air pollution, and a shift against walking, cycling and public transport in favour of the private car" (9.422)</li><li>• the "whole justification of the TGB is based not on reducing the need to travel, but on increasing it" (9.145), that it "would facilitate commuting by car" (9.146) and be "likely to cause increased congestion" (9.187)</li><li>• the scheme would "result in a negative contribution to the Government's commitment to reducing greenhouse gases" (9.427)</li><li>• of air quality being made worse as a result of the TGB: "in an area in which air quality has historically been low, and where it is identified as a current problem, I do not regard</li></ul>					

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						<p>that as acceptable" (9.416).</p> <p>If a new piece of road is built and that makes it easier for people now to drive, then new vehicle journeys are created as some people switch from eg taking the bus and others make new trips.</p> <p>More traffic would mean WORSE congestion overall around the area of the new crossings - as all the extra vehicles would have to get to and from the ends of the new crossings.</p> <p>TfL would have to toll the new crossings as well as the existing Blackwall tunnel - but this does not help:</p> <p>-if TfL tolled so heavily there was no extra traffic at all then why spend millions of pounds? If the crossings managed to re-distribute the existing congestion (and helped the existing Blackwall problem) then that could be done without building new roads/vehicle crossings.</p> <p>-if TfL did allow even a bit more traffic (which would be expected as TfL see that as a benefit to regeneration) then that extra traffic would mean worse congestion in the area around and worse air pollution.</p> <p>The Mayor and TfL, and Greenwich, are not prepared to take the action needed now to cut traffic levels and tackle air pollution, so we can't afford to make it harder by adding to the problem.</p> <p>Further information on Friends of the Earth's views on the river crossings - after comments on the process, there are comments on the issues.</p> <p><a href="http://stopcityairportmasterplan.tumblr.com/post/44616122230/friends-of-the-earth-river-crossings-response">http://stopcityairportmasterplan.tumblr.com/post/44616122230/friends-of-the-earth-river-crossings-response</a></p> <p>TfL have recently published the results of their recent consultation, claiming support, but these results apparently showing public support cannot be taken as any such thing - people responding had very little to go on and may have got the impression from TfL that they would help with congestion, when in fact resulting extra traffic would add to congestion in the wider area around the new road crossings (but the implications for eg air pollution were not set out).</p>					
	Policy IM(c) Parking Standards	630863	Transport for London	Not specified	Not specified	<p>TfL welcomes the requirement for new developments to ensure that car</p> <p>parking, Blue Badge car parking and Electric Vehicle</p>					<a href="#">76</a>

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						<p>Charging Points (EVCPs)</p> <p>are provided in line standards set out in London Plan Policy 6.13 (Table 6.2). In</p> <p>addition, TfL welcomes the commitment of RB Greenwich to support the</p> <p>expansion of car club schemes in new developments.</p> <p>TfL welcomes the commitment to ensure that new developments provide a</p> <p>minimum level of cycle parking in line with the standards set out in London</p> <p>Plan Policy 6.9 (Table 6.3) although it should be noted that these have been</p> <p>subject to review and, as such, the latest adopted London Plan standards</p> <p>should be used.</p> <p>In areas which experience high levels of demand for on street car parking,</p> <p>Travel Planning measures such as the funding of Controlled Parking Zones</p> <p>(CPZ's) and parking permit eligibility restrictions for residents should be</p> <p>considered as measures to reduce the impacts of new development. It should</p> <p>also be noted that contrary to paragraph 4.8.45, the London Plan only specifies</p> <p>maximum standards for car parking</p>					
	Policy IM(c) Parking Standards	148127	WM Morrison Supermarkets Plc	Not specified	No	<p>Emerging Policy IM(c) is too stringent, especially the proposed measures that seek to establish developments in areas of high public transport accessibility and within Controlled Parking Zones (which may include most town centres) to be 'car free'. In order to fulfil the objectives of the NPPF, 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.</p>		267475		Peacock and Smith Limited	<a href="#">415</a>

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						<p>Car parks associated with foodstores within 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.</p> <p>In terms of the policy direction in the adopted London Plan, Policy 6.13 Parking, states:</p> <p>‘in town centres where there are identified issues of vitality and viability, the need to regenerate such centres may require a more flexible approach to the provision of public car parking to serve the town centre as a whole.’</p> <p>We therefore consider that emerging Policy IM(c) Parking Standards, as currently drafted, is unsound. The emerging policy is not consistent with the adopted London Plan.</p>					
	Policy IM(c) Parking Standards	166972	Cathedral Group	Yes	No	There should be flexibility provided within the policy to reflect site specific circumstances. Where PTAL levels are low or there are areas of Controlled Parking Zones, RBG should allow for higher car parking standards if justified by the circumstances of the particular development being proposed. This will seek to reduce any on street parking which may exacerbate any existing issues in the local neighbourhood.	The policy should include a reference to flexibility on car parking standards to reflect site specific circumstances. This will help to ensure that the policy can deliver acceptable levels of parking provision to meet the needs of the new residents while protectinf neighbouring amenity. Any consideration of site specific issues should encourage the use of public transport.	188810		Nathaniel Lichfield and Partners	<a href="#">504</a>
	Policy IM(c) Parking Standards	756674		No	No	<p>BENGROVE INVESTMENTS LTD CONSIDER THERE SHOULD BE MORE FLEXIBILITY WITHIN POLICY IM(c) TO REFLECT SITE SPECIFIC CIRCUMSTANCES. RBG SHOULD ALLOW FOR HIGHER PARKING STANDARDS IF JUSTIFIED BY THE PARTICULAR DEVELOPMENT PROPOSAL. THE POLICY SHOULD BE CONSISTENT WITH POLICY IM4 WHICH STATES:</p> <p>"...DEVELOPMENTS MUST NOT GO ABOVE THOSE MAXIMUM PARKING STANDARDS SET OUT IN THE LONDON PLAN AND, WHERE APPROPRIATE, SHOULD GO BELOW THESE. RESIDENTIAL DEVELOPMENT SHOULD PROVIDE NO MORE THAN ONE SPACE PER UNIT".</p>	<p>THE POLICY SHOULD INCLUDE A REFERENCE TO FLEXIBILITY ON CAR PARKING STANDARDS TO REFLECT SITE SPECIFIC CIRCUMSTANCES AND BE IN LINE WITH POLICY 1V14.</p> <p>THIS WILL HELP TO ENSURE THAT THE POLICY CAN DELIVER ACCEPTABLE LEVELS OF PARKING PROVISION TO MEET THE NEEDS OF THE NEW RESIDENTS WHILE PROTECTING NEIGHBOURING AMENITY AND ENCOURAGING THE USE OF PUBLIC TRANSPORT.</p>	756671	Mrs Sarah Moorhouse	Associate Director Nathaniel Lichfield & Partners	<a href="#">451</a>
	Policy IM(d) London City Airport	148036	Ms Jenny Bates	Not specified	No	<p>We object to Policy IM(d) London City Airport</p> <p>To be sound this must refer to noise and the need to avoid any increase in noise blight, and to reduce the numbers affected.</p> <p>Any development of the airport that resulted in more noise and/or a bigger public safety zone (PSZ) would add to blight on Greenwich.</p>					<a href="#">435</a>

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	Policy IM(d) London City Airport	760607	Alan Haughton	Not specified	Not specified	Land required for London City Airport to develop it's Masterplan must be reserved and not be developed especially in even of a larger PSZ. Council should seek to reduce nuisance caused by existing uses from the emission of noise must include London City Airport now and in the future. Core strategy also has policy IM(d) London City Airport - which does not talk about noise. Any development of the airport that resulted in more noise and/or a bigger public safety zone (PSZ) would add to blight on Greenwich.					<a href="#">368</a>
	Policy IM1 Infrastructure	630863	Transport for London	Not specified	Not specified	In respect of Paragraph 4.8.8, TfL requests that the scope of this paragraph is  revised to reflect the need for the use of Planning Obligations to assist deliver  bus service enhancements as well as site specific transport mitigations.					<a href="#">70</a>
	Policy IM1 Infrastructure	265434	Carmelle Bell	Not specified	No	The policy is not considered to be sound as it would not be effective in relation to the delivery of water and wastewater infrastructure to support growth. As set out in section 2.4.11 of the Infrastructure Delivery Plan 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 and sewerage infrastructure.  Thames Water rely on the use of planning conditions to ensure that any necessary water and wastewater infrastructure upgrades are delivered in advance of the occupation of development as such upgrades cannot be secured through planning obligations. While the policy makes reference to the use of conditions there is no reference to how water and wastewater infrastructure would be delivered.	In order to ensure the policy is effective in relation to the provision of any necessary water and wastewater infrastructure upgrades, consistent with the evidence base in terms of the content of the IDP and consistent with Policy 5.14 of the London Plan and paragraph 156 of the NPPF it is considered that additional supporting text should be provided as set out below.  Proposed additional supporting text for Policy IM1:  The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewage treatment capacity to serve all new developments. Where development will impact on water and wastewater infrastructure developers will be required to demonstrate that there is adequate capacity 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 infrastructure. Where there is a capacity problem and no improvements are programmed by the statutory undertaker, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development. Such improvements will be secured by condition.  In order to ensure that the drainage requirements of				<a href="#">84</a>

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							development proposals are understood and that any upgrade requirements are identified, all developers are encouraged to contact Thames Water Developer Services in advance of the submission of applications.				
	Policy IM1 Infrastructure	634722	Crossrail	Not specified	Not specified	<p>Policy IM1 sets out the requirement for all qualifying development to contribute towards the provision of necessary infrastructure to mitigate the impact of a new development. We support the use of planning conditions and obligations to secure this provision, however, we note that the level of obligations must remain proportionate to the development. As stated in the NPPF, “developments should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened” (para 173.).</p> <p>We also welcome the support given to transport schemes which are critical to the Borough’s development, especially the introduction of Crossrail at Woolwich. To maximise the potential benefits of this new station, support for the intensification of the area surrounding the new station should also be outlined in the supporting text. This is in line with the promotion of Woolwich as a major town centre.</p>		634723	Stephen Harrington	GVA Grimley	<a href="#">100</a>
	Policy IM1 Infrastructure	166965	Berkeley Homes	Not specified	Not specified	<p>We consider that Policy IM1 currently fails to take account of CIL. The Policy only refers to infrastructure delivery via planning obligations and conditions and fails to recognise that key strategic infrastructure in the borough will be delivered via CIL in the future. The Community Infrastructure Levy Regulations 2010 seek to limit the use of planning obligations to deliver/fund infrastructure and we feel that the Policy should therefore be amended to take account of infrastructure delivery via CIL, planning obligations and conditions.</p>		188419	Mr Bob McCurry	Senior Planner Barton Willmore	<a href="#">407</a>
	Policy IM1 Infrastructure	501408	Mr John	Not specified	No	The policy refers only to infrastructure requirements as related to proposed developments requiring planning consent, and makes no reference to infrastructure and	Include statement regarding the Council’s own intent to ensure/achieve improvements to/development of the infrastructure and movement				<a href="#">148</a>

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	ture		Franklin			<p>movement matters falling within its own purview, eg. traffic management schemes and pedestrian priority proposals.</p> <p>The Support paragraphs make reference to the Infrastructure Delivery Plan (Para 4.8.6), but the draft IDP attached to the proposed submission version is clearly some years out of date in various sections: for example there is internal evidence that the sections on education (3.2.13), health (3.3.19) and leisure centres (3.5.10) were prepared in mid-2011, and those on fire and police are also out-dated.</p>	<p>within the Royal Borough, with reference to an updated supporting IDP.</p> <p>Update Para 2.1.24 to reflect the current situation regarding traffic management/pedestrianisation intent/proposals for Greenwich Town Centre - and add: “This is an important concern for all those living and working in the Town Centre, and the local community will be fully consulted.”</p>				
	Policy IM1 Infrastructure	502653	Linda Pound	Not specified	No	<p>It is recognised that Greenwich Council is not the main provider of infrastructure, but in the light of experience, residents are concerned that lack of funding and other financial considerations will see other parties reducing or failing in their remit to provide facilities and services. There are already reductions in the percentage of affordable housing being provided in schemes all over the borough, as developers say they cannot attract sufficient investment if 35% affordable housing is a requirement. Lack of infrastructure provision as a result of financial reasons is feared,</p> <p>Planning Conditions can be varied "down the line" at any stage and "flexibility" has the potential to see negotiated reduction in obligations on developers. This would result in severe harm. to individuals, the local community and the wider social fabric.</p>	<p>Para 4.8.5 (final sentence) should be amended to ensure that provision of infrastructure should always be required prior to the completion of a development.</p> <p>There should be a designated level at which the infrastructure must be in place: for example by the time each phase of a development reaches 50% completion point. Putting people into housing units is all very well, but if they lack access to schools, medical facilities, shops and recreational areas, a decent quality of life becomes impossible for both the new residents and the surrounding areas which are placed under stress.</p>				<a href="#">316</a>
	Policy IM1 Infrastructure	166972	Cathedral Group	Yes	No	Policy IM1 sets out the requirement for all qualifying development to contribute towards the provision of necessary infrastructure to mitigate the impact of a new development. We support the use of planning conditions and obligations to secure this provision, however, we note that the level of obligations must remain proportionate to the development. As stated in the NPPF, “developments should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened” (para 173.).		228178	Ms Diana Thomson	GVA Grimley	<a href="#">475</a>
	Policy IM2 Waste Apportionment	756861		Yes	Yes	<p>This submission is made on behalf of an occupier of Murphy’s Wharf, Day Group Ltd. Day Group Ltd operate a river served facility from the eastern half of Murphy’s Wharf which includes an aggregates conveyor fed by barge/sea going vessels, and 4 recycling operations: post-consumer glass, construction and demolition arisings, utility spoil and the manufacture of hydraulically bound materials. The recycling of utility spoil generates a percentage of waste destined for landfill which is moved by barge.</p> <p>The site is in active use and is a key part of the Day Group business and they are committed to the continued use of the</p>		756860	Ms Kate Matthews	Firstplan	<a href="#">12</a>

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						<p>Wharf. The Wharf is in an industrial area and benefits from existing on-site infrastructure. Furthermore, it is demonstrably viable for the handling of waterborne freight.</p> <p>Days support the safeguarding of their site at Lombard Walk, Charlton which will help to protect the existing use of the site.</p>					
	Policy IM2 Waste Apportionment	248000	Mrs Clare Loops	Not specified	Yes	The new designation of the safeguarded waste sites, along with joint working with other southeast London boroughs, including the pooling of the boroughs' waste allocations and identifying sites within the sub-region, is supported, and the boroughs are working together well under the duty to cooperate to meet the Mayor's waste requirements					<a href="#">80</a>
	Policy IM2 Waste Apportionment	167326	Mayor of London	Not specified	No	<p>London Plan policies 5.16-5.19 of the London Plan set out strategic policy requirements regarding waste.</p> <p>The Core Strategy states that the South East London Technical paper sets out that the boroughs have enough sites to meet apportionment. The Council should be aware that the GLA does not deem this paper to be in general conformity with the London Plan and that the Borough's Core Strategy/DPD will need to identify waste sites for meeting its apportionment requirements.</p> <p>The Council will need to set out its criteria for determining planning applications whilst waste development plan documents are prepared. As such this DPD is not in general conformity with the London Plan.</p> <p>In addition the Core Strategy lists four current waste sites which are safeguarded. The Core Strategy should also include a policy that sets out that all existing waste sites are safeguarded. As currently drafted the document is not in general conformity with the London Plan</p>					<a href="#">173</a>
	Policy IM2 Waste Apportionment	167229	Ms Lucy Owen	Yes	No	Policy IM2 safeguards Days Aggregates as an existing waste management site. The site also handles aggregates over the jetty and is part of a safeguarded wharf. Therefore, 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.	Widen policy IM2 in relation to Days Aggregates to reflect its location on a safeguarded wharf and safeguard it for cargo handling, including waste transfer.				<a href="#">348</a>
	Policy IM3 Critical Physical Infrastructure	629637	Dr Leslie Clark	No	No	The DPD policy on the Gallions Reach Crossing and the Silvertown Tunnel has not been justified in the DPD or elsewhere. The appropriate traffic modelling and business case have not yet been produced and the policy appears to be based on a broad "gut feel" that all development is good rather than a reasoned case. The policy does not take into account the evidence that additional road building increases congestion, with consequent air pollution and health	Remove the clause advocating these particular river crossings.				<a href="#">18</a>

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						problems in the local population, or modelling from previous river crossing studies that a Gallions Reach bridge would not be supported by the road system south of the Thames. The policy does not take into account the objections of neighbouring boroughs such as Bexley to the Gallions Bridge.					
	Policy IM3 Critical Physical Infrastructure	148464	Mr Lawrence Smith	Yes	No	<p>A new package of river crossings (2nd bullet point) would almost certainly lead to increases in road traffic, thus adding to air pollution. It</p> <p>would therefore undermine the effectiveness of policy E(c) on air pollution.</p>	<p>Add a new bullet point after the existing second point: "advocate and work in partnership with relevant agencies to ensure that, despite</p> <p>any increase in road capacity, there is no increase in traffic levels in the Borough."</p>				<a href="#">44</a>
	Policy IM3 Critical Physical Infrastructure	630863	Transport for London	Not specified	Not specified	<p>TfL welcomes proposals to ensure the delivery of Crossrail and secure</p> <p>appropriate financial contributions towards the project, and consider this is in</p> <p>accordance with London Plan Policy 6.2.</p> <p>TfL notes proposals to improve connectivity between the north and south of the</p> <p>borough through the delivery of ‘fixed links’ such as light rail extensions. In</p> <p>response to this, the London Plan, the TfL Business Plan nor the East Sub</p> <p>Regional Transport Plan propose or support such schemes.</p> <p>TfL welcomes the commitment to enhance river bus services and piers in the</p> <p>borough, in accordance with London Plan Policies 6.1 and 7.25. TfL’s River</p> <p>Action Plan sets out measures which will be adopted to increase demand for</p> <p>river usage to 12 million passengers a year by 2020. The measures proposed</p> <p>to achieve this uplift, include the provision of improved passenger information,</p> <p>wayfinding signage and cycle parking at Greenwich, North Greenwich and</p> <p>Woolwich Arsenal piers. However, the Action Plan, nor the</p>				<a href="#">71</a>	

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						<p>East Sub Regional</p> <p>Transport Plan contains a commitment to support an extension of services or</p> <p>development of a new riverbus pier at Thamesmead.</p> <p>TfL welcome proposals to deliver improved transport infrastructure along the</p> <p>Greenwich waterfront area. TfL notes a reference to the provision of a rapid</p> <p>bus service, and while Policy 6.7 of the London Plan encourages DPDs to</p> <p>promote bus transit, there is no reference to rapid transit services. To avoid</p> <p>confusion, TfL requests that the reference made to this in paragraph 4.8.19 is</p> <p>removed, and encourages RB Greenwich to ensure that proposals better</p> <p>reflect the position outlined in London Plan Policy 6.7.</p> <p>More generally in respect of Paragraph 4.8.20, TfL encourages RB Greenwich</p> <p>to revise this to state that the borough and TfL should be engaged with major</p> <p>development at an early stage to ensure that issues arising relating to transport</p> <p>can be appropriately addressed.</p> <p>The Core Strategy document does not identify and safeguard existing land</p> <p>used for transport functions. In line with London Plan Policy 6.2, the document</p> <p>should identify and safeguard existing transport uses.</p>					
	Policy IM3 Critical Physical Infrastruc	248000	Mrs Clare Loops	Yes	No	<p>The proposed name change for site m2 to Gallions Reach Bridge – this is not in general conformity with the London Plan, as a bridge is too limited in scope. The Mayor’s preference, set out in the Mayor’s Transport Strategy, is for a replacement ferry crossing at Gallion’s Reach, with a</p>					<a href="#">81</a>

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	ture					<p>longer term possibility of a fixed link at this location. Therefore, site m2 should not be given the word ‘bridge’ in it’s name, as this is not a broad enough term, and implies that only a bridge would be the appropriate form of river crossing at this location.</p> <p>In addition, using the word ‘bridge’ in the designation is more limiting than the wording in Core Strategy policy IM3, which states: ‘advocate and work in partnership with relevant agencies to deliver a new package of Thames river crossings in East London, including the continued safeguarding of the Silvertown Link Tunnel and the Gallions Reach crossing (see Proposals Map),’ with the supporting paragraph stating that ‘although the development of fixed river crossings remain the Council's priority, in the shorter term support will also be given to cross river ferry services, which can provide improved connectivity at a lower cost than a fixed crossing.’</p> <p>The Infrastructure Delivery Plan for the Core Strategy suggests in paragraph 2.1.31 that: ‘an alternative Gallions Reach crossing has been proposed by the Mayor of London, that would provide some of the benefits of the Thames Gateway Bridge without the negative impacts. The likely cost of the Gallions Reach crossing is in the region of £600 million.’ Further in the same paragraph, the IDP states that: ‘TfL are also investigating the possibility of a ferry crossing at Gallions Reach as an alternative crossing point in that area. The approximate cost of this is in the region of £150m. However the Council favours a fixed link at Gallions Reach (either a tunnel or bridge).’ This suggests that the ferry option is not the Mayor’s preferred option. However, the Mayor’s Transport Strategy (May 2010) in proposal 39 seeks: in part b) an upgraded Woolwich Ferry and consideration of a new vehicle ferry at Gallions Reach to improve connectivity and in part d) consideration of a longer-term fixed link at Gallions Reach.</p>					
	Policy IM3 Critical Physical Infrastructure	147698	Laurie Baker	Not specified	Not specified	The Society supports these Strategic Policies.	In Policy IM3 we urge the Council to complete the work on the North-South fixed link. If this scheme is feasible, it can be included to attract contributions from appropriate developments.				<a href="#">160</a>
	Policy IM3 Critical Physical Infrastructure	148036	Ms Jenny Bates	Not specified	No	<p>We object to Policy IM3 Critical Physical Infrastructure</p> <p>This says Greenwich will "support those transport schemes that are critical to the Borough's development and will:" and the 2nd bullet point is about a new package of Thames river crossings - and mentions including continued safeguarding for the Silvertown Link and Gallions Reach crossing,</p>					<a href="#">431</a>

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						<p>There is text on the river crossings in 4.8.17</p> <p>The inclusion of reference to the the Silvertown Link and Gallions Reach crossings, which are both proposed as crossings for vehicles does not represent Sustainable Development and is not justified by the evidence - indeed the evidence shows they are not critical.</p> <p>Greenwich have been supportive of these crossings with a "Bridge the Gap" campaign, but apparently without evidence of their benefits and without evidence of their dis-benefits.</p> <p>To be sound this policy (and supporting text) must express support for schemes which would help improve accessibility and support regeneration while also helping to cut CO2 and air pollution so that targets and limits are met, and addressing inequalities - ie development that is win-win-win ie Sustainable Development</p> <p>Options for non-road options would need to be properly looked at, including combinations of them.</p>					
	Policy IM3 Critical Physical Infrastructure	148451	Tilfen	No	No	Policy IM3 sets out the key infrastructure projects for the Borough. This includes aspirations for an extended river bus service to Thamesmead Town Centre and Tripcock Point. 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.	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.	382433	Mr Craig Blatchford	Blue Sky Planning	<a href="#">304</a>
	Policy IM3 Critical Physical Infrastructure	502653	Linda Pound	Not specified	No	<p>Parts of Policy IM3, notably road expansion, may not be in accordance with the requirements to reduce road traffic/emissions. There is also concern about proposed fixed links (light rail routes) and how these would impact on existing housing. There is already tension in the Sustainability Appraisal (Sections 5.1.2 and 5.2 10) about Charlton Rivet-side. The impact of massive housing development without adequate transport is of great concern to residents. There is the possibility of the existing public transport (particularly Charlton Station) becoming impossibly over-loaded.</p> <p>Although it is appreciated that Greenwich Council is not the provider of public transport, it should act more robustly to secure all necessary improvements. "Trying to secure..." improvement does not allay residents' fears.</p>	<p>Policy IM3 needs to be more proactive about reducing road traffic, rather than giving it more room to expand.</p> <p>Para 4,8.19 needs much stronger wording in order to convince residents that improvements will take place and that services (envisaged as a rapid bus service) will not bypass the Charlton that already exists. There is no obvious commitment to integrate a bus service through Riverside with Charlton south of the A206. Indeed, the plans can be read as only developing Riverside so as to link the Peninsula and Woolwich, and that as a result, both Riverside and Charlton will be isolated from each other.</p>				<a href="#">318</a>

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	Policy IM3 Critical Physical Infrastructure	537756	Mr Richard Lee	Not specified	No	Policy IM3 says they will "support those transport schemes that are critical to the Borough's development" and the 2nd bullet point is about a new package of Thames river crossings. We object to new river crossings for vehicles and for non-road options to be properly looked at in the context of helping to cut CO2 and air pollution.					<a href="#">250</a>
	Policy IM3 Critical Physical Infrastructure	759994	Ian Blore	Not specified	No	<p>I would like to formally submit comments on the draft Core Strategy. I am unable to use the form electronically and expect these comments will be taken into consideration as a formal submission.</p> <p>My comments apply to Policy IM3 Paragraph 4.8.17 (Map N/A) I consider the policy to be Unsound because it is ill prepared, not justified and will be ineffective in achieving the stated goals of the Strategy. I would particularly seek an amendment to the following sub-paragraph:</p> <p>[The strategy will] advocate and work in partnership with relevant agencies to deliver a new package of Thames river crossings in East London, including the continued safeguarding of the Silvertown Link Tunnel and the Gallions Reach crossing (see Proposals Map);</p> <p>I would recommend an amendment to that policy should read: "consider economic, environmental and health impacts of a range of possible improved river crossings and give priority to those which are most likely to satisfy the goals of providing better sustainable outcomes in terms of regeneration, air quality, health and social fairness".</p>	I would recommend an amendment to that policy should read: "consider economic, environmental and health impacts of a range of possible improved river crossings and give priority to those which are most likely to satisfy the goals of providing better sustainable outcomes in terms of regeneration, air quality, health and social fairness".				<a href="#">285</a>
	Policy IM3 Critical Physical Infrastructure	167229	Ms Lucy Owen	Yes	No	<p>Policy IM3 sets out the transport schemes that are seen as critical to the Borough's development. This includes working with relevant agencies to deliver a new package of Thames River Crossings; supporting the intensification of the use of the river for transport of people and freight, including upgrades to the Woolwich Ferry service and protecting and enhancing river bus services and piers in the Borough, including supporting a new pier and an extended river bus service to Thamesmead.</p> <p>This is then reflected in paragraph 4.8.17 which advises that "proposals that will increase the use of the river for transport purposes will be supported and encouraged...although the development of fixed river crossings remain the Council's priority, in the shorter term support will also be given to cross river ferry services... Piers and river bus services are important infrastructure for increasing the use of the river and, in particular, a new pier at Thamesmead to allow for an extended river bus service is supported."</p>	Include a reference in policy IM3 to the Borough waterway support facilities being critical transport infrastructure through their role servicing and repairing vessels				<a href="#">349</a>

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						<p>It is questioned why the Borough's waterway support facilities are not included as critical transport infrastructure given the vital role that they play.</p> <p>It has not been possible to find the proposals map online — I have only been able to find the proposed changes to the proposals map and therefore it is unclear where any new pier / extended river bus service is proposed. The recently published River Action Plan shows neither of these things so further information is required to ensure that any proposal is capable of being implemented (for example its proposed location would not cause a hazard to navigation).</p>					
	Policy IM4 Sustainable Travel	630863	Transport for London	Not specified	Not specified	<p>TfL welcomes the promotion of walking and cycling within this policy and</p> <p>consider that the aspirations and proposals accord with both policies 6.9 and</p> <p>6.10 of the London Plan. TfL note that the borough’s emerging cycling strategy</p> <p>provides further detail on specific cycling measures in the borough, and</p> <p>encourages RB Greenwich to ensure this strategy aligns with ‘The Mayor’s</p> <p>Vision for Cycling in London’ (March 2013).</p> <p>TfL supports proposals relating to the car parking and welcome the</p> <p>commitment to align maximum parking standards with those set out within the</p> <p>London Plan.</p> <p>In respect of the pedestrian crossing of Deptford Creek, this should be</p> <p>designed or sited so as to continue to enable access to the safeguarded wharf</p> <p>on the Creek.</p>				<a href="#">72</a>	
	Policy IM4 Sustainable Travel	147775	Mr Brian Regan	Yes	Yes	<p>• Should Policy IM4 acknowledge that the location of a pedestrian bridge across the Creek be agreed between the two boroughs?</p>					<a href="#">113</a>

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	Policy IM4 Sustainable Travel	148036	Ms Jenny Bates	Not specified	No	<p>We object to Policy IM4 Sustainable Travel</p> <p>To be sound it needs to have stronger policies to support sustainable travel (and for funding to be prioritised) including targets for modal share</p> <p>for trips by walking and cycling commensurate with targets for cut traffic levels, which in turn need to be commensurate with meeting climate change targets and air pollution limits.</p>					<a href="#">432</a>
	Policy IM4 Sustainable Travel	148451	Tilfen	No	No	<p>Policy IM4 states, inter alia, "in order to reduce the use of the car, developments, must not go above those maximum parking standards set out in the London Plan and, where appropriate, should go below these. Residential developments MUST provide a no more than one space per unit" [our emphasis]. Tilfen Land acknowledges the London Plan car parking standards should be the starting point for assessing number of car parking spaces within any scheme. However, we respectfully suggest that with regards commercial development IM4 should allow a degree of flexibility to meet the particular requirements of businesses if additional car parking spaces can be fully justified for operational or other reasons. For example, businesses that operate on a 24 hour basis can require additional car parking provision as public transport provision late at night does not provide suitable alternatives.</p> <p>With particular regards car parking standards in relation to residential development, Tilfen Land considers that a maximum requirement of no more than one space per dwelling is too prescriptive and in any event does not reflect the London Plan. The London Plan sets out a range of car parking standards with a maximum of 2 spaces for a 4+ bedroom dwelling.</p>	<p>We would recommend that the "must" is replaced with "should".</p> <p>We suggest that Policy IM4 is revised to reflect the London Plan's residential car parking standards.</p>	382433	Mr Craig Blatchford	Blue Sky Planning	<a href="#">306</a>
	Policy IM4 Sustainable Travel	166965	Berkeley Homes	Not specified	Not specified	<p>We support the Council's intention in Policy IM4 to align the car parking standards with those in the London Plan (July 2011). The final paragraph of Policy IM4 states:</p> <p>“In order to reduce the use of the car, developments must not go above those maximum parking standards set out in the London Plan and, where appropriate, should go below these. Residential developments must provide no more than one space per unit”.</p> <p>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. With regards to public transport accessibility Policy IM4 and IM(c) should refer to the car parking matrixes within the Mayor's</p>		188419	Mr Bob McCurry	Senior Planner Barton Willmore	<a href="#">408</a>

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						<p>Housing SPG which take account of public transport accessibility.</p> <p>The Royal 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.</p> <p>The London Plan (July 2011) 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 residential parking standards in the London Plan (July 2011).</p> <p>We would also like to highlight that paragraph 4.8.42 in the Core Strategy is inconsistent with the final paragraph in Policy IM4. Paragraph 4.8.42 currently states:</p> <p>“The maximum car parking standards for residential developments set out in policy IM4 are below the London Plan standards, to reflect the existing pressure on parking in the Borough”.</p> <p>For absolute clarity, Policy IM4 states that the maximum car parking standards are those in the London Plan (July 2011) and therefore we recommended that paragraph 4.8.42 is amended so it is consistent with the Policy (IM4).</p>					
	Policy IM4 Sustainable Travel	537756	Mr Richard Lee	Not specified	No	We seek stronger policies under IM4 on sustainable travel					<a href="#">251</a>
	Policy IM4 Sustainable Travel	167229	Ms Lucy Owen	Yes	No	<p>The policy seeks for development along the riverside 'must' ensure they incorporate the provision for a riverside pathway.</p> <p>The word 'must' should be removed and replaced with 'where appropriate' to reflect that it may not always be possible for development to incorporate a riverside path. For example, it may not be appropriate for a development on a safeguarded wharf to include the Thames path along the front of the site where cargo is being handled.</p>	Remove the word 'must' and replace it with 'where appropriate'				<a href="#">350</a>
	Policy	167239		Not	Not specified	GH supports the need for sustainable travel, particularly		76067	Ed	Deloitte	<a href="#">394</a>

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	IM4 Sustainable Travel			specified		<p>within the context of the significant need to improve highways around Greenwich town centre. GH supports the identification of the need for the access needs of those with disabilities and cyclists to be prioritised, although request that the guidance also incorporates recognition that prioritising access needs in existing buildings has the potential to have an unacceptable impact on other parts of the development and that development proposals in existing buildings will be considered on a site by site basis.</p> <p>Paragraph 4.8.26 — GH supports the identification of the need for improvements to the pedestrian environment and, in particular, the need to promote Legible London.</p> <p>Paragraph 4.8.28 — The paragraph states that Greenwich Town Centre will be classed as 'Inner London' for the purposes of calculating maximum levels of parking, for broad classes of development. However, the definition is not justified with reference to any evidence base. We therefore request that this paragraph is removed from the Core Strategy, unless sufficiently justified.</p>		2	Britton	Real Estate	
	Policy IM5 Freight	756861		Yes	Yes	<p>This submission is made on behalf of an occupier of Murphy's Wharf, Day Group Ltd. Day Group Ltd operate a river served facility from the eastern half of Murphy's Wharf which includes an aggregates conveyor fed by barge/sea going vessels, and 4 recycling operations: post-consumer glass, construction and demolition arisings, utility spoil and the manufacture of hydraulically bound materials. The recycling of utility spoil generates a percentage of waste destined for landfill which is moved by barge.</p> <p>The site is in active use and is a key part of the Day Group business and they are committed to the continued use of the Wharf. The Wharf is in an industrial area and benefits from existing on-site infrastructure. Furthermore, it is demonstrably viable for the handling of waterborne freight.</p> <p>We welcome the inclusion of Policy IM5, Freight, which confirms the safeguarding of Murphy's Wharf (amongst other safeguarded wharves).</p> <p>The including of this policy is considered essential to ensure that the Core Strategy is in conformity with national and strategic planning policy and is therefore “sound”.</p> <p>The National Planning Policy Framework (NPPF) Paragraph 143 requires that in preparing Local Plans, local planning authorities should:</p> <p>“safeguard: existing, planned and potential rail heads, rail</p>		756860	Ms Kate Matthews	Firstplan	<a href="#">11</a>

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						<p>links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials”</p> <p>London Plan Policy 6.14 requires that DPDs should promote sustainable freight transport by:</p> <p>“safeguarding existing sites and identifying new sites to enable the transfer of freight to rail and water”</p> <p>London Plan Policy 7.26 is clear that:</p> <p>“Development proposals should:</p> <p>a. protect existing facilities for waterborne freight traffic, in particular safeguarded wharves should only be used for waterborne freight handling use. The redevelopment of safeguarded wharves for other land uses should only be accepted if the wharf is no longer viable or capable of being made viable for waterborne freight handling (criteria for assessing the viability of wharves are set out in paragraph 7.77). Temporary uses should only be allowed where they do not preclude the wharf being reused for waterborne freight handling uses (see paragraph 7.78). The Mayor will review the designation of safeguarded wharves prior to 2012.”</p> <p>It is relevant that the GLA have just completed its safeguarded wharves review which was published in March 2013 and the final safeguarding recommendations have been sent to the Secretary of State. The Mayor is now awaiting approval of his recommendations and issuing of new directions. Notably the Mayor is not recommending changes to the existing direction for the safeguarding of Murphy’s Wharf which is recommended for safeguarding.</p> <p>The proposal to safeguard Murphy’s Wharf is therefore consistent with National Policy and the London Plan and is therefore sound. However, if the Core Strategy did not offer this protection then the plan would be unsound.</p>					
	Policy IM5 Freight	630863	Transport for London	Not specified	Not specified	TfL welcome the proposals outlined in Policy IM5, and consider that the promotion of the movement of freight by water, and the commitment to the safeguarding of wharves and railheads for aggregate distribution accord with Policy 6.14 of the London Plan.					<a href="#">73</a>
	Policy IM5 Freight	167326	Mayor of London	Not specified	No	Angerstein Wharf (Charlton Riverside), Murphy's Wharf (Charlton Riverside), Tunnel Wharf (Greenwich Peninsula West), Riverside Wharf (Charlton Riverside) and VDWT (Greewich Peninsula West) (all proposed for continued					<a href="#">168</a>

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						<p>safeguarding in the Mayor's Safeguarded Wharves Review - Final Recommendation) are all within Strategic Development Locations and Strategic Industrial Locations. There is little information in the Core Strategy as to how the continued operations of the wharfs will be protected. The treatment of Riverside and Tunnel Wharf are of particular concern to the Mayor. Riverside Wharf (also proposed for continued safeguarding) is only within a Strategic Development Location and not within a Strategic Industrial Location. This is of significant concern, in particular as the wharf is in active use (and therefore viable) and the Charlton Riverside Masterplan does not give an indication for a potential alternative site to accommodate the required wharf capacity within the area.</p> <p>The confirmation of the safeguarding of the five wharves within the borough through Policy IM5 is welcome although they don't appear to be distinctively defined on the Proposals Map as the policy claims. The Supporting Text refers to the Thames as having 'potential for increased usage' (paragraph 4.8.32). For Riverside and Tunnel Wharf the Council's aspiration to remove their safeguarding in the future is reiterated (paragraph 4.8.33). This paragraph does not reflect the objective of the underlying policy, which focuses on sustainable transport. As currently drafted the document is not in general conformity with the London Plan in this regard.</p>					
	Policy IM5 Freight	167229	Ms Lucy Owen	Yes	No	<p>Policy IM5 is concerned with freight. It refers to the safeguarding of Angerstein, Brewery, Murphy's, Riverside, Tunnel Wharves and Victoria Deep Water Terminal, as defined on the proposals map for river based cargo handling. It states that alternative uses will only be considered if the wharf is no longer viable or capable of being made viable for river based cargo handling or, exceptionally, for a strategic proposal of essential benefit to London.</p> <p>The PLA welcomes the safeguarding of the above wharves for river based cargo handling. Such an approach accords with National and London Plan policy which seeks the safeguarding of wharves and their protection and use for waterborne freight handling. I would reiterate that it has not been possible to view the proposals map so it is not clear how these wharves are defined on it. It is also questioned why parts of policy 7.26 and its supporting text have been cherry picked from the London Plan to incorporate into policy IM5. Policy 7.26 makes it clear that the redevelopment of safeguarded wharves for other land uses should only accepted if the wharf is no longer viable or capable of being made viable for waterborne freight</p>	<p>Make the proposals map easier to view so it can be ascertained how the wharves have been defined on the proposals map.</p> <p>Add the words to IM5 - 'the only exception to this would be for a strategic proposal of essential benefit for London, which cannot be planned for and delivered on any other site in Greater London'</p> <p>Make the rest of the Core Strategy consistent with policy IM5 (the masterplan SPDs will also require updating) - remove any aspirations of the Council's regarding Riverside and Tunnel wharves</p> <p>Have it clear in IM5 v) that the reference to moving bulk materials by water include the use of the river during construction</p> <p>Update para 4.8.32 to reflect the fact that Deptford Creek is a navigable waterway</p>				<a href="#">351</a>

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						<p>handling. It is the supporting text at paragraph 7.77 that refers to the exception test stating "the only exception to this would be for a strategic proposal of essential benefit for London, which cannot be planned for and delivered on any other site in Greater London"</p> <p>The general approach set out in policy IM5, with the above comments, appears to be at odds with the rest of the Core Strategy and the adopted SPD's Masterplan which highlight the Council's desire to see alternative developments on Riverside and Tunnel Wharves. This desire is reflected in paragraph 4.8.33 where it is stated "As is demonstrated in the Charlton Riverside and Greenwich Peninsula West Masterplan SPD's, it/s the Council's long term aspiration to remove the safeguarding of Riverside and Tunnel Wharves to realise the full potential of those sites but the safeguarded status of those wharves will be respected as long as the safeguarding remains."</p> <p>Given the Directions that apply to the safeguarded wharves; the policy protection from the National Level downwards afforded to safeguarded wharves; the Safeguarded Wharves Review Final Recommendation — March 2013 seeks the retention of the safeguarding of all of the wharves and the Council has put forward no evidence to justify the removal of the safeguarding status of Riverside and Tunnel Wharves it is considered that all references to their removal should be removed from the Core Strategy.</p> <p>Policy IM5(iii) supports proposals that increase the proportion of freight in the Borough that is waterborne, maximising the movement of bulk materials by water. This reference is supported and accords with National and London Plan policy.</p> <p>Policy IM5(v) seeks to maximise the movement of bulk materials by water and paragraph 4.8.35 makes reference to the need for construction logistics plans and delivery and servicing plans. It is assumed that this includes the use of the river for the transport of bulk materials to and from development sites but it would be useful if this was more explicitly stated.</p> <p>Para 4.8.32, The River Thames is not the Borough's only navigable waterway. Deptford Creek can also be navigated and is, for example, vessels navigated to and from the safeguarded Brewery Wharf.</p>					
	Policy OS(a) Develop	147698	Laurie Baker	Not specified	Not specified	Management policies OS (a) to (g) are supported but these must be rigorously applied with the pressures for development and increasing population on open land that					<a href="#">158</a>

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	ment in Metropolitan Open Land					are ever present. Even the most “deserving” cases of development should be resisted.					
	Policy OS(a) Development in Metropolitan Open Land	148488	Mrs A.E. Hart	Not specified	No	OS(a) is unsound as it does not refer to the possibility that MOL could be privatised or semi-privatised.	The change I am seeking is to state that public MOL must not be privatised or semi-privatised but remain as a public amenity.				<a href="#">272</a>
	Policy OS(a) Development in Metropolitan Open Land	148488	Mrs A.E. Hart								<a href="#">592</a>
	Policy OS(a) Development in Metropolitan Open Land	537756	Mr Richard Lee	Not specified	No	It should be stated that this space cannot be (semi)-privatised in order to ensure its full use potential.					<a href="#">244</a>
	Policy OS(a) Development in Metropolitan Open Land	626561	Mr Paul McQuillen	Yes	Yes	I wish to SUPPORT the designation of site numbered ‘8’ (Bardhill Sports Ground) on the Open Space supporting documents (Figure 1.1 etc) as Metropolitan Open Land. This site is an integral part of the adjoining wider area of MOL and should be restored and maintained as a sports facility, specifically for the nearby Wyborne Primary School. Submission of this SUPPORT is to counter any proposals to change the designation of the site from MOL that would threaten its status as open space and sports field.					<a href="#">286</a>
	Policy OS(b) Community Open Space	147485		Not specified	Not specified	Sport England welcomes this policy.					<a href="#">123</a>
	Policy OS(b) Community Open Space	148488	Mrs A.E. Hart	Not specified	No	OS(b) does not clarify why COS does not come under MOL.	The change I am seeking is to clarify why COS does not come under MOL. It should also emphasise the benefits, access and special qualities of COS.				<a href="#">273</a>
	Policy OS(b) Communi	537756	Mr Richard	Not specified	No	It should clarify why community open space does not fall under Metropolitan Open Land. It should also emphasise the benefits, access and quality of community space.					<a href="#">245</a>

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	ty Open Space		Lee								
	Policy OS(b) Community Open Space	626561	Mr Paul McQuillen	Yes	Yes	I wish to SUPPORT the designation of site numbered ‘107’ (Gaelic Athletic Association) on the Open Space supporting documents (Figure 1.1 etc) as Community Open Space. This site is an integral part of the adjoining wider area of Open Space and should be restored and maintained as a sports facility or another appropriate Open Space use. Submission of this SUPPORT is to counter any proposals to change the designation of the site from COS that would threaten its status as open space and sports field.					<a href="#">287</a>
	Policy OS(b) Community Open Space	759951	Mr G Halkyard	Not specified	No	<p>Limited changes to the open space designations within the saved 2006 UDP Proposals Map are proposed. Some additions to the current designations are proposed at the Royal Arsenal (proposed Community Open Space designation) and St Paul's Academy (proposed Community Open Space designation) and Sutcliffe Park (proposed Local Nature Reserve designation).</p> <p>No deletions are proposed. However, this statement promotes the case for deleting the current Community Open Space designation at Rush Grove House, Rushgrove Street, Woolwich.</p> <p>The site is a private domestic curtilage, serving a single dwellinghouse, which is Grade 11 Listed. The site does not, nor has it ever, fulfilled any role as a Community Open Space. It is surrounded by a circa 2m tall brick wall and 2m tall timber gates, as well as numerous site trees which completely obscure any public views of the gardens and lake within the site. The only views of this site are available from within the business units to the south along Artillery Road and from within Hastings House, a multi-storey flatted development to the north.</p> <p>Much of the land is occupied by a large pond (the Mulgrave Pond), meaning that it could not be developed. Moreover, given the Grade II Listed status of the dwellinghouse, any development proposal within the site would need to be sensitive to the house and would have to respect its character, appearance and historic significance.</p> <p>The owner wishes to remove the current designation because it is at odds with the way in which the land has historically and will continue to function.</p> <p>Draft Core Strategy Policy OS(b) relates to Community Open Space and explains that new buildings and extensions to existing buildings within designated Community Open Spaces will be permitted where the proposal is ancillary to</p>	<p>Without prejudice to the foregoing case for the deletion of the Community Open Space designation, in the event that the designation is sustained, amendments are suggested to draft Policy OS(b) and the text at paragraph 4.5.26. An objection is raised to the current wording of the draft policy and supportive text.</p> <p>4.2. As currently drafted, the policy allows development which would be ancillary to the use of the land, limited in size and extent, sensitively sited and compatible with neighbouring forms of development. In view of the objective of draft Policy OS1 to improve public access to open spaces, it is considered that Policy OS(b) should state that developments which would improve access to the land for the community will be considered favourably. For the reasons of safety, security, privacy and amenity, the policy should not require unrestricted public access, but could support development which would allow more people to use and benefit from the land in order that land which is currently wholly private can begin to play a role which is more beneficial to the community. The following wording is suggested:</p> <p>Policy OS(b) Community Open Space</p> <p>"New buildings and extensions to existing buildings in Community Open Space will be permitted where they are ancillary to the existing land use, are limited in size and extent, sensitively sited and are compatible with neighbouring development. New buildings will also be permitted where the development of the Community Open Space would establish or improve the community's access to the land ..."</p> <p>4.5.26</p>	730769	Mr Mark Batchelor	Associate Robinson Escott Planning	<a href="#">257</a>

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						<p>the existing land use, would be limited in size and extent and would be sensitively sited and compatible with neighbouring development. The draft policy is identical to saved UDP Policy 07.</p> <p>The supporting text explains that those public and private open spaces in the Borough not defined as Metropolitan Open Land provide important functions for the local and wider community and should be safeguarded from development pressures. The land at Rush Grove House is private garden land with no public access and, as is explained above, it cannot be seen from any public vantage points given the high boundary walls (which are curtilage listed) and site trees. There are private views across the lake, which forms part of the site that could not be developed.</p> <p>The site has frequently been fly-tipped by residents within the Hastings House development and although Mr Halkyard has planted a tree screen along the boundary and has contacted the site manager/caretaker at Hastings House in an attempt to dissuade such action, the fly-tipping has continued. Clearly the views across the land and Mulgrave Pond are not valued by the only residents who have access to such outlook.</p> <p>The site does not fulfil any important function for the local and wider community and as such, the site's current Community Open Space designation should be deleted.</p> <p>Paragraph 4.5.26 of the supportive text to draft Policy OS(b) continues by explaining that Community Open Spaces comprise a variety of uses, including local parks, playing fields, sportsgrounds and allotments and not all are publically accessible. The text suggests that the spaces fulfil specific functions for the local or wider community and provide welcome open breaks within the built up area.</p> <p>The land at Rush Grove House does not fall within any of the common listed uses of Community Open Spaces. It is a private garden, the same as that belonging to any other dwellinghouse within the Royal Borough, which have not been designated for such purposes. We are not aware of any other private garden which is designated as Community Open Space and it is unclear why the garden at Rush Grove House has this arbitrary allocation.</p> <p>The list of common Community Open Space uses does comprise some private/semi-private land, including allotments and sportsgrounds. Although these are not all freely accessible to the public, they do play some role in</p>	<p>"The numerous public and private open spaces within the built up areas of the Borough not defined as Metropolitan Open Land provide important functions for the local and wider community and need to be safeguarded from built development pressures. There are examples within the Royal Borough of private gardens which are designated as Community Open Spaces, which currently provide no access to the local community and as such do not fulfil any beneficial role to the community. However, it is recognised that they could play an important role in enhancing access to open spaces, particularly where there is a localised shortage. Where this applies, the Council will consider favourably proposals for developments which would provide access to the land by the future residential community within that site. ..."</p> <p>This suggested change would help to deliver the Development Plan policy objectives, in terms of enhancing access to Community Open Space in an area which has been identified as being deficient in this respect and by helping to deliver new housing in attractively landscaped settings.</p>				

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						<p>providing limited access to users who benefit from that open space and often provide attractive and interesting views. The same cannot be said for the garden at Rush Grove House, which is only used by the family in occupation at the dwellinghouse and cannot be seen from the public realm.</p> <p>Given the tall boundary walls and the backdrop of the tall flatted development at Hastings House, the garden at Rush Grove House does not provide any perceptible relief from built form.</p> <p>The designation is completely at odds with the use of the site and its character and should, therefore, be deleted.</p> <p>The map associated with paragraph 4.5.28 shows Open Space Deficiency Areas. The site at Rush Grove House lies mainly within such an area, as illustrated by the extract from that map on the page below (see attached file)</p>					
	Policy OS(b) Community Open Space	759961	Barbara Holland	Not specified	Not specified	<p>Charlton Community Gardens is a new voluntary organisation whose aim is to bring unused and unloved spaces in Charlton back into use for food growing by the local community. We therefore welcome the Council’s current proposals to protect the open spaces of the Borough. These give local communities the chance to enjoy fresh air and tranquility in our increasingly busy lives, as well as improving health and well-being through activity and exercise.</p> <p>We wish to take the opportunity offered by this consultation to ensure that the only piece of open space in central Charlton, at Highcombe, continues to be designated as Community Open Space in line with policies OS1, OS (b) and OS (c).</p> <p>Further, we would urge the Council to support our aim to open up some of this space as a community garden for local people. This would help specifically to deliver on policies CH1 and CH2 (vii) for Cohesive and Healthy Communities. This would end 20 years of the site being closed off by the owners while they have sought to use the site for a new school and associated development. The current proposal to rebuild Our Lady of Grace primary school at the site offers the ideal opportunity to secure open space for a community garden as part of the overall development.</p> <p>Giving the local community access to the site would help to provide public open space in a Local Park Deficiency Area – (4.5.27 and 4.5.28), and space for community food growing in an area with no allotments currently available.</p>				<a href="#">258</a>	

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						<p>The limited sites that do exist have closed their waiting lists (4.7.28).</p> <p>We would therefore urge the Council to consider this representation as part of the consultation on the Core Strategy Development Management Policies (Proposed Submission Version) in support of the proposed policies for Open Space and Cohesive and Healthy Communities.</p>					
	Policy OS(b) Community Open Space	759967	Roger Stanton	Not specified	Not specified	<p>I welcome the Council’s current proposals to protect the open spaces of the Borough.</p> <p>These give local communities the chances chance to enjoy fresh air and tranquillity in our increasingly busy lives, as week as improving health and well-being through activity and exercise.</p> <p>As a member of Charlton Community Gardens, I wish to take this opportunity to ensure that only piece of open space in central Charlton at Highcombe, continues to be designated as Community Open Space in line with policies OS1, OS (b) and OS (c).</p> <p>Further, I urge the council to support their aim to open up some of this space as a community garden for local people.</p> <p>This would help specifically to deliver on policies CH1 and CH2 (vii) for Cohesive and Healthy Communities.</p> <p>This would end 20 years of the site being closed off by the owners while they have sought for use of the site for a new school and associated developments.</p> <p>Giving the local community access to the site would help to provide public open space in a Local Park Deficiency Area – (4.5.27 and 4.2.28), and the space for community food growing in an area of no allotments currently available, and limited sites that there are have closed waiting lists (4.7.28).</p> <p>The proposals to rebuild Our Lady of Grace primary school at the site offers the ideal opportunity to secure the open space for Charlton Community Gardens ass part of the overall development.</p> <p>I would therefore urge the Council to consider this representation as part of the consultation on the Core Strategy Development Management Policies (Proposed Submission Version) in support of the proposed policies for Open Space and Cohesive and Healthy Communities.</p>				<a href="#">264</a>	
	Policy OS(b)	500348		Not specified	Not specified	The proposed designation as Community Open Space in the emerging CSDMP is entirely unsuitable given the Site’s		761295	Sam	DP9	<a href="#">410</a>

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	Community Open Space					<p>history of vacancy, the planning history and its dilapidated condition. The Council's strategy and evidence base for its open space and housing policies contained in the emerging CSDMP fail a number of the tests for soundness for plan-making provided in the NPPF. The NPPF seeks to release unused sites and land to stimulate housing and mixed use development as part of the Government's strategy to deliver sustainable development. Therefore, the retention of the Community Open Space designation on a site which has remained vacant for over 20 years is clearly not consistent with the policy objectives of the NPPF.</p> <p>For the reasons set out above, the Community Open Space designation should be lifted and replaced with an allocation for mixed use development comprising residential and community open space/facilities. The proposed site allocation should be brought forward separately through the Council's emerging Site Allocations document. This approach was previously agreed by Planning Officers at the Royal Borough of Greenwich and the Inspector during the preparation of the UDP.</p> <p>Similarly, draft policy OS(b) does not refer to the policy tests provided at paragraph 74 of the NPPF. Draft policy OS(b) is almost identical to saved policy O7 of the UDP adopted in 2006- the Council's existing policy which deals with Community Open Space. This demonstrates the fact that national policy contained in the NPPF has not been taken into account in the drafting of this policy. Draft policy OS(b) should be amended to refer to the policy tests provided at paragraph 74 of the NPPF in order to be consistent with national policy.</p>			Hine		
	Policy OS(c) Public Open Space Deficiency Areas	757596	The Charlton Society	Yes	No	West Charlton is deficient in green open space.	Carry out a formal review and include consideration of Highcombe.				<a href="#">52</a>
	Policy OS(c) Public Open Space Deficiency Areas	147485		Not specified	Not specified	Sport England welcomes this policy.					<a href="#">124</a>
	Policy OS(c) Public	502653	Linda Pound	Not specified	Yes	The narrative at para 4.5.27 does not link easily with the map on page 119. Parks in the borough are not marked on the map; and the map is too small to be clearly	In the interests of clarity, the map needs to be resized, the parks clearly marked; and the categorisation as per the London Plan should be				<a href="#">311</a>

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	Open Space Deficiency Areas					<p>decipherable. There is also the anomaly of much of Heritage Greenwich being defined as a District Park Deficiency Area and a Local Parks Deficiency Area, when the Royal Park is slap bang in the middle!</p> <p>Reference to Table 7.2 of the London Plan does suggest that there are technical reasons (size specification/facilities/distance from homes etc) for the way the map has been drawn, but these are far from clear in the document. At first sight, the designations look very unbalanced and it takes a lot of research to discover that Maryon Wilson Park (12.95 hectares) is somewhere between a Local and a District Park; that Charlton Park (21.57 hectares) is probably a District Park; and that Maryon Park (just under 30 hectares) is somewhere between a District and a Metropolitan Park.</p>	included.				
	Policy OS(c) Public Open Space Deficiency Areas	626561	Mr Paul McQuillen	Not specified	No	There are discrepancies in Supporting Documentation regarding Public Open Space Deficiency Areas. Two sites under the ownership of the University of Greenwich adjacent to the Southwood campus and numbered '245' are neither Pubic Open Space (Figure 5.2) or Local Parks (Figure 5.5). This fact has been confirmed by managers in the Royal Borough's Parks Department. This obviously invalidates the accuracy of this evidence especially with regard to the Local Parks Deficiency Areas and Accessibility zoning. Technically this could also have an impact on the accuracy of other statistics in supporting documentation.	Once the Royal Borough has confirmed the correct designation of the University of Greenwich sites numbered '245' the maps in Figures 5.2 and 5.5 should be amended accordingly before this evidence is used for any planning role.				<a href="#">288</a>
	Policy OS(c) Public Open Space Deficiency Areas	166972	Cathedral Group	Yes	No	<p>Cathedral Group raises the concern that the policy is too onerous and does not take account of site specific facotrs such as access to inclusion of the waterfront as part of development proposals.</p> <p>The enhancement of the waterfront will mean that increased numbers of people will seek to use the areas adjacent to the River Thames as amenity areas instead of seeking other types of open space provision. This will clearly be determined on a site by site basis at the application stage. The policy should be amended to reflect this position.</p>	<p>The policy should be re-worded so that there is greater recognition that the type and quantity of open space provision in deficient areas should reflect the site specific nature of the application proposed.</p> <p>Additonal third sentence recommendation:</p> <p>The development of new residential schemes of over 50 units in deficiency areas will be required to incorporate public open space provision. The type and quantum of open space required will depend upon site specific circumstances and proposed access to a range of outdoor amenity space including the River and associated Thames Path.</p> <p>The change is needed to ensure the Core Strategy can deliver open space requirements to meet the specific needs of the proposed development instead of adopting a blanket approach.</p>	188810		Nathaniel Lichfield and Partners	<a href="#">503</a>
	Policy	166972	Cathedral	Yes	No	The provision of open space is an important factor in new	Where it can be demonstrated that provision would	22817	Ms	GVA	<a href="#">472</a>

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	OS(c) Public Open Space Deficiency Areas		Group			residential developments however, the level of on-site provision should be appropriate for the site and location. .	be better met off-site, the policy should allow for proposals to secure this. As above, the feasibility and viability of on-site provision should be taken into account when determining the level of provision required.	8	Diana Thomson	Grimley	
	Policy OS(d) Sportsgrounds and Playing Fields	635582	Ashleigh Marsh	No	No	<p>I object to 3 aspects of the Core Strategy and believe that they show that areas of the overall strategy at present are not sound, not being justified, positively prepared or effective.</p> <p>I would like to take part in the examination of the plans to provide and discover background information.</p> <p>I will try to post this on the consultation portal site, but find the separation of comments required impractical and not helpful in setting out wider relevant information.</p> <p>I have referred to a previous draft of the Core Strategy in 2010/11 where appropriate to flag up where identified issues for concern have not since been fully addressed. I also refer to the Unitary Development Plan, the previous planning framework which contains valuable safeguards for recreation space, which need to be maintained, and to the 2012 Supplementary Planning Documents for Woolwich and Charlton which were adopted before this Core Strategy consultation.</p> <p>This comment is posted also as relevant to Woolwich Town Centre</p> <p>1. Woolwich Riverside - Open Space loss</p> <p>This relates mainly to Woolwich Town Centre Strategic Development Location, supporting paragraphs 3.3.5-9 and Table 3.2 in the 2013 Core Strategy, and to Policy OS1 Open Space, which is currently being prepared - 4.5.4 2013 Draft Core Strategy</p> <p>and to Policy OS (d)</p> <p>My first objection is to the loss of public play space on Woolwich riverside, which should be replaced with an equivalent area and facilities for recreation. The London Plan does not support the removal of playing fields and other sports provision without replacement sites being secured. This should be assured before planning permission is granted. However Greenwich have permitted high-rise high density development on the Warren Lane site, which is a much needed public park in an area of open space</p>	The Core Strategy should include a meaningful commitment to replace this recreation space, not with paved landscaped areas but with open playing fields and a free wheeled sports facility, as at present.			<a href="#">57</a>	

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						<p>deprivation, yet have not sought to provide a suitable local replacement while preparing the Core Strategy.</p> <p>From Greenwich Unitary Development Plan (01 Protecting Open Space)</p> <p>Map 5 on page 78 shows the Public Open Space Deficiency Area in Woolwich.</p> <p>"d. The proposal must not result in the enlargement or creation of an area of public open</p> <p>space deficiency (see Policy O9).</p> <p>Map 5 on page 78 of the UDP shows the Public Open Space Deficiency Area in Woolwich. It is similar to Map 4.5.28 in the 2013 Core Strategy.</p> <p>In the 2013 Core Strategy Policy OSd the conditions have been changed to an and/or format, which does not guarantee replacement. It is not proper positive preparation that this policy should be changed to have retro-active effect on a planning application.Such a change has implications for the reliability of monitoring and effective implementation of any plans.</p> <p>The Warren Lane site was particularly excluded from the Woolwich Riverside Supplementary Planning Document consultation in 2012, while the Core Strategy was being prepared, on the grounds that planning permission had already been granted. This is not positive preparation, which should take into account such circumstances and seek to address their consequences pro-actively. The desire to secure a Crossrail Station for Woolwich has led to a conflict of interest, with increasing pressure from the developers Berkeley Homes to increase the density of development, against local feeling, while still making no clear commitment to build the station. This brings into question the effectiveness of Greenwich's planning priorities and implementation, as the council have agreed to the developer's modifications without obtaining the promised planning gain in compensation, or providing for the loss of community facilities entailed.</p> <p>The Core Strategy should include a meaningful commitment to replace this recreation space, not with paved landscaped areas but with open playing fields and a free wheeled sports facility, as at present.</p> <p>The local well-used leisure centre in a prime riverside location is also planned to be relocated to a site yet to be</p>					

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						<p>agreed. The justification for this is questionable - Allies and Morrison, consultants for the Supplementary Planning Document, claimed that it would 'open up the view to the river'. There is no suitable alternative site of a comparable size in the area, and with the population set to increase such fitness facilities will be vital to community health.</p> <p>Community facilities by the river in Woolwich are under pressure where they are because of potential profits from development. Lack of community play space within high-density residential development has proved to be a bad equation, contributing to social tension rather than to sustainable communities. The fact that these developments will be mostly 'high value' rather than social housing has not been shown to make a positive difference against such environmental factors. We are at the stage of a social experiment here. Greenwich risks repeating the recognised planning errors that high density residential development has involved.</p>					
	Policy OS(d) Sportsgro unds and Playing Fields	757304	Mr Ken Hobday	Yes	No	I believe that all Green Open Space is a valuable resource that should be protected against built development of any sort. There has been a considerable loss of Playing Fields across London in recent years. Open Green Space makes a valuable community resource and once lost to development is lost forever. Therefore there should be a complete presumption against any development of Sports or Playing Fields.	<p>Greenwich Council will resist granting any Planning Permission on any Sports, or Playing Fields within the Borough, because Greenwich Council recognises and values the importance of such Green Open Spaces in providing Community Open Space.</p> <p>Any unused Sports or Playing Fields, whether in private, or Public ownership will therefore continue to be Green Open Space though may be used in a different capacity other than that of a Sports, or Playing Field, so long as it remains Community Green Space of beneficial use to the community.</p>				<a href="#">58</a>
	Policy OS(d) Sportsgro unds and Playing Fields	147485		Not specified	Not specified	<p>Sport England broadly welcomes this policy. However, in order for it to comply with Sport England’s Playing Fields Policy (<a href="http://www.sportengland.org/facilities__planning/playing_field_3.aspx">http://www.sportengland.org/facilities__planning/playing_field_3.aspx</a>) and the NPPF, the following changes are required:</p> <ul style="list-style-type: none"><li>• Aii – this should not be a separate point to A i. Sport England therefore recommends that Ai and Aii are combined, in line with Sport England’s playing fields policy exception 1 and the NPPF</li><li>• Aiii – should be deleted as it is against Sport England’s playing fields policy and the NPPF</li><li>• Bii – should be deleted as it is against Sport England’s playing fields policy and the NPPF</li></ul>					<a href="#">125</a>

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						<ul style="list-style-type: none"> <li>• Biii – Sport England recommends that Biii is revised in line with Sport England’s playing fields policy exception 5 and the NPPF</li> <li>• Bv – should be deleted as it is against Sport England’s playing fields policy and the NPPF</li> </ul>					
	Policy OS(d) Sportsgrounds and Playing Fields	148268	Mr and Mrs Yodry Vasquez	Not specified	No	The new document removes proper safeguards of sportsfields meaning it is misleading as it gives the opposite impression.	The Borough will not allow community open spaces or sports grounds to be lost. The Borough will have even more residents in the near future and propoer safeguards must be in place for all these fields to be used in the future too.				<a href="#">369</a>
	Policy OS(d) Sportsgrounds and Playing Fields	148488	Mrs A.E. Hart	Not specified	No	OS(d) is not justified by the evidence that there are vast increases in population planned in the Borough so Sports Grounds and Playing Fields should remain as open space for all the reasons to be found at 10.1 to 10.7 in ‘Greenwich Open Space Study, Vol.1, Amended 2013’: that is, if they are not required for sport at present to consider their role as open space for recreation, their structural role, amenity and heritage value, ecological, environmental and educational value, for community, cultural, social focus and for health benefits. .	The change I am seeking to OS(d) is to have no exceptions to refuse planning permission for any development which would lead to the loss, or would prejudice the use, of a playing field of land last used as a playing field. Sports Grounds and Playing Fields should no longer accommodate asphalt, buildings or other developments unless they are integral to providing facilities for sport.				<a href="#">275</a>
	Policy OS(d) Sportsgrounds and Playing Fields	537756	Mr Richard Lee	Not specified	No	The exceptions should be minimised to ensure the proper safeguarding and increase of sports grounds and playing fields					<a href="#">246</a>
	Policy OS(d) Sportsgrounds and Playing Fields	626561	Mr Paul McQuillen	Yes	No	<p>There should be a requirement for owners of Sportsgrounds and Playing Fields to maintain the site in a useable condition and market the site (for hire and/or sale) to optimise the facility for this purpose.</p> <p>It has been demonstrated that owners of sports fields in the Royal Borough have deliberately allowed the sites to deteriorate beyond use and/or refuse to make the site available for sports and recreation purposes. The motive has been to try to indicate that there is ‘no demand’ for the site as a sports facility with the aim of changing the designation from MOL or COS to permit redevelopment.</p> <p>I believe that a condition should be included in part A or part B of the exceptions.</p>	<p>I would like an additional clause/wording in part A or part B of the exceptions to include the following or similar requirements;</p> <p>“and has been adequately maintained for its primary purpose and subject to widespread marketing either for hire or sale”</p>				<a href="#">290</a>
	Policy OS(d) Sportsgrounds and	500348		Not specified	Not specified	Draft policy OS(d) relates specifically to sportsgrounds and playing fields. The draft policy requires up to four separate tests to be met in order for development on existing sportsgrounds and playing fields to be considered		761295	Sam Hine	DP9	<a href="#">412</a>

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	Playing Fields					acceptable in principle. The draft policy is almost identical to saved policy O11 of the UDP which demonstrates the fact that current national policy contained in the NPPF has not been taken into account in the drafting of this policy. Emerging policy OS(d) should be amended to accurately reflect the tests for release of open space for development provided at paragraph 74 of the NPPF.					
	Policy OS(d) Sportsgrounds and Playing Fields	760655	Mr Keith Webster	No	No	The owners of sports fields have deliberately prevented the purchase or lease of their grounds for recreational purposes far exceeding the five year time limit. eg the Bardhill site in Footscray Road and the Gaelic Athletic Association ground in Avery Hill Road.	<p>a) The need to consult should not be limited to any time period.</p> <p>b) Consultation should extend to other bodies where potential recreational use lies outside the purview of Sport England.</p> <p>c) In accordance with a previous government directive, any planning application affecting a ground designated as either MOL or COS should first be advertised for sale in the national press as a test of need.</p>				<a href="#">370</a>
	Policy OS(d) Sportsgrounds and Playing Fields	760655	Mr Keith Webster	No	No	Quote "The emerging Open Space Strategy found that there are 252 sports pitches throughout the Borough".	It is understood that this reference relates to a survey conducted in 2008 which is now outdated. A single statistic is anyway valueless unless related to other data as it conveys no idea of the availability of pitches for specific sports, their current use or likely future need and could be construed as misleading. Also paragraph 4.5.31 appears at variance with paragraph 4.5.29 which suggests a trend for increased recreational activity. As the most popular participating sport, football authorities make specific requirements as to pitch size, enclosure requirements and changing facilities according to age levels and playing standards.				<a href="#">371</a>
	Policy OS(e) Wildlife Deficiency Areas	502653	Linda Pound	Not specified	No	WILDLIFE DEFICIENCY Research/fact finding are sketchy/insufficiently detailed. Between the UDP and the Submission Version of the Core Strategy, large areas of the borough, which were classed as being in Wildlife Deficiency Areas, have had their designation changed for no apparent reasons. In central Charlton for example there has been no change in provision of such sites yet the status has been changed, without explanation. Comparison of UDP Map 6 and the Core Strategy Submission Map on Page 122 shows this clearly. Even where so-called "accessible" sites are provided, they are not accessible to all residents, such as young families with a baby buggy or anyone with a mobility problem/need. There has been little/no change in the number of "accessible wildlife sites" between 2006 (date of the UDP) and 2013, but with the removal of areas from a deficiency designation, RBG is	Either provide a clear justification for the re-drawing of the Wildlife Deficiency Map or reinstate the coverage as shown in UDP Map 6. The removal of so many areas from Wildlife Deficiency status is not compatible with RBG 's stated views on protecting and improving the environment.				<a href="#">310</a>

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						absolving itself from earlier commitments to secure more sites and improve accessibility.					
	Policy OS(f) Ecological Factors	502448	Mr Laurie Baker	Not specified	Not specified	<p>Whilst we are happy that geological features are mentioned in Policy OS (f), we feel that to conserve geodiversity (and, similarly, biodiversity) it would be helpful to state that:</p> <p>“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.”</p>					<a href="#">104</a>
	Policy OS(f) Ecological Factors	148486	Ms Wendy Shelton	Not specified	Not specified	OS(f) Ecological Factors - please refer back to comments on Policy OS4 Biodiversity and Policy DH1 Design.					<a href="#">226</a>
	Policy OS(g) Green and River Corridors	148464	Mr Lawrence Smith	Yes	No	"Development will not normally be permitted " is not strong enough to provide the required protection.	The second sentence should read: "Development will only exceptionally be permitted..."				<a href="#">39</a>
	Policy OS1 Open Space	757403	Mr Graeme Humphrey	Yes	No	<p>The Core Strategy states that Greenwich has an extensive and varied provision of open space and recreational facilities, which make a significant contribution to biodiversity and the quality of life in the Borough. This Core Strategy, and subsequent Site Specific Allocations Document and Proposals Map should translate this policy aim to specific areas. The role of the Site Specific Allocations Document and Proposals Map is to define these areas. This is set out in the Council's Local Development Scheme 2013, which states in Paragraph 6.2 'The Proposals Map will be updated as and when required alongside the adoption of the Site Specific Allocations DPD'.</p> <p>On behalf of Bovis Homes Limited we will be making submissions throughout the preparation of both of these seeking the exclusion of land off Blackheath Park from its current Metropolitan Open Land designation. There has been a change in circumstance since the inclusion of this site in the current Greenwich Proposals Map as Metropolitan Open Land, as these tennis courts and club house are no longer used, and are completely derelict. They therefore make no contribution to the provision of open space in the Borough. They cannot be considered as a 'green space', nor as a place where 'natural biodiversity' is conserved.</p> <p>Our objection to Policy OS1 is that there is no reference to the process of any alteration to the boundaries of the MOL in these subsequent Documents, including any change to</p>	<p>Policy OS1 Open Space - (as proposed to be changed)</p> <p>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, (which will be updated alongside the adoption of the Site Specific Allocations Document), as well as other small open spaces such as Local Green Spaces.</p>	757384	Mr Geoff Smith	Director of Planning  DMH Stallard LLP	<a href="#">15</a>

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						land uses, such as these tennis courts and club house becoming derelict. It could therefore be concluded that the current MOL boundaries, (and open space function), as defined in the Greenwich Unitary Development Plan 2006 and Proposals Map, are to be retained on adoption of this Core Strategy. Therefore, to avoid this uncertainty, and to confirm that possible alterations to the Metropolitan Open Land (such as the land off Blackheath Park) will be considered through the preparation of the Greenwich Site Specific Allocations Document and Proposals Map, which we understand will be during 2013 / 2014, we propose the following change to Policy OS1					
	Policy OS1 Open Space	148036	Ms Jenny Bates	Not specified	No	<p>We object to Policy OS1 Open Space</p> <p>To be sound this policy needs to refer to redressing open space deficiencies, which the Strategy does flag up - ie rather than just to say access would be improved.</p>					<a href="#">425</a>
	Policy OS1 Open Space	759951	Mr G Halkyard	Not specified	No	<p>Draft Policy OSI is a general policy which would relate to all open spaces within the Borough, both public and private. The policy seeks to encourage greater levels of public access to private open spaces, including Community Open Space, with the supporting text at paragraph 4.5.7 stating that Open Spaces are a recreational resource and provide opportunities for residents to participate in sport and leisure activities as well as improve the health and wellbeing of residents. Although this might be true of publically accessible open spaces within the Borough and some of the private spaces (including sportsgrounds and allotments), it is not true of the private residential curtilage at Rush Grove House.</p> <p>Providing unrestricted, unsupervised public access to the private residential curtilage at Rush Grove House (or any other designation private curtilage within the Royal Borough) would seriously undermine the privacy and amenities which future residents of the house would enjoy, as well as seriously compromising the safety and security of those residents. The Policy should, therefore, make an exception, accepting that it would be undesirable to have public access to private residential curtilages.</p> <p>In addition, given the existence of the Mulgrave Pond, providing unpoliced public access to the grounds of the house would present a health and safety risk given the risk presented by the pond and the lack of safety and security features around its perimeter.</p> <p>Continuing to designate Rush Grove House as Community Open Space would be contrary to the objectives of saved UDP Policy H7, which seeks to ensure that adequate levels</p>		730769	Mr Mark Batchelor	Associate Robinson Escott Planning	<a href="#">256</a>

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						of privacy and amenity are provided for all existing and future residents. The designation would also be contrary to the objectives of draft Core Strategy Policy H5, which seeks to secure safety and security for residents and the public and would be in conflict with the objectives of draft Core Strategy Policy DH(b) which seeks to ensure that residents are provided with adequate levels of privacy and amenity.					
	Policy OS1 Open Space	760189	Gavin McGregor	Not specified	Not specified	<p>I welcome the Council’s current proposals to protect the open spaces of</p> <p>the Borough. These give local communities the chance to enjoy fresh air and</p> <p>tranquility in our increasingly busy lives, as well as improving health and well-being through activity and exercise.</p> <p>As a member of Charlton Community Gardens, I wish to take this opportunity</p> <p>to ensure that the only piece of open space in central Charlton at Highcombe,</p> <p>continues to be designated as Community Open Space in line with policies OS1,</p> <p>OS (b) and OS (c).</p> <p>Further, I would urge the Council to support our aim to open up some of this</p> <p>space as a community garden for local people. This would help specifically to</p> <p>deliver on policies CH1 and CH2 (vii) for Cohesive and Healthy Communities. This</p> <p>would end 20 years of the site being closed off by the owners while they have</p> <p>sought to use the site for a new school and associated development.</p> <p>Giving the local community access to the site would help to provide public open</p> <p>space in a Local Park Deficiency Area – (4.5.27 and 4.5.28), and space for</p> <p>community food growing in an area with no allotments</p>				<a href="#">322</a>	

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						<p>currently available, and the</p> <p>limited sites that there are have closed their waiting lists (4.7.28).</p> <p>The proposals to rebuild Our Lady of Grace primary school at the site offers the</p> <p>ideal opportunity to secure open space for Charlton Community Gardens as part of the overall development.</p> <p>I would therefore urge the Council to consider this representation as part of the</p> <p>consultation on the Core Strategy Development Management Policies (Proposed</p> <p>Submission Version) in support of the proposed policies for Open Space and</p> <p>Cohesive and Healthy Communities.</p>					
	Policy OS1 Open Space	760191	Rachel Maggio	Not specified	Not specified	<p>I welcome the Council’s current proposals to protect the open spaces of the Borough. These give local communities the chance to enjoy fresh air and tranquility in our increasingly busy lives, as well as improving health and well-being through activity and exercise.</p> <p>As a member of Charlton Community Gardens, I/we wish to take this opportunity to ensure that the only piece of open space in central Charlton at Highcombe, continues to be designated as Community Open Space in line with policies OS1, OS (b) and OS (c).</p> <p>Further, I/would urge the Council to support our aim to open up some of this space as a community garden for local people. This would help specifically to deliver on policies CH1 and CH2 (vii) for Cohesive and Healthy Communities. This would end 20 years of the site being closed off by the owners while they have sought to use the site for a new school and associated development.</p> <p>Giving the local community access to the site would help to provide public open space in a Local Park Deficiency Area – (4.5.27 and 4.5.28), and space for community food growing in an area with no allotments currently available, and the limited sites that there are have closed their waiting lists (4.7.28).</p> <p>The proposals to rebuild Our Lady of Grace primary school at the site offers the ideal opportunity to secure open space</p>				<a href="#">328</a>	

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						<p>for Charlton Community Gardens as part of the overall development.</p> <p>I would therefore urge the Council to consider this representation as part of the consultation on the Core Strategy Development Management Policies (Proposed Submission Version) in support of the proposed policies for Open Space and Cohesive and Healthy Communities.</p>					
	Policy OS1 Open Space	500348		Not specified	Not specified	<p>The policy wording for draft policy OS1 should be amended in order to be consistent with paragraph 74 of the NPPF which states:</p> <p>‘Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> <li>• An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</li> <li>• The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</li> <li>• The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.’</li> </ul> <p>Paragraph 74 of the NPPF clearly stipulates that, subject to one of the above policy tests being met, the release of open space for development will be acceptable in principle. Draft policy OS1 does not provide any scope for the release of open space for development and is therefore not consistent with national policy contained in the NPPF. Therefore, the draft policy should be amended to include reference to the policy tests set out above.</p>		761295	Sam Hine	DP9	<a href="#">411</a>
	Policy OS1 Open Space	755935		Not specified	Not specified	<p>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.</p>	<p>The following amendments to the current draft Policy OS1 are suggested:</p> <p>“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.”</p>	755933	Mr Mark Novelle	Planning Deloitte Real Estate	<a href="#">379</a>
	Policy OS1 Open Space	760194	Tony Maggio	Not specified	Not specified	<p>I welcome the Council’s current proposals to protect the open spaces of the Borough. These give local communities the chance to enjoy fresh air and tranquility in our increasingly busy lives, as well as improving health and well-being through activity and exercise.</p>					<a href="#">334</a>

Title	Number	Person ID	Full Name	Is the DPD legally compliant?	Is the DPD sound?	Reasons for legal compliance and soundness	Changes necessary for legal compliance and soundness	Agent ID	Full Name	Organisation Details	Comment ID
						<p>As a member of Charlton Community Gardens, I/we wish to take this opportunity to ensure that the only piece of open space in central Charlton at Highcombe, continues to be designated as Community Open Space in line with policies OS1, OS (b) and OS (c).</p> <p>Further, I/would urge the Council to support our aim to open up some of this space as a community garden for local people. This would help specifically to deliver on policies CH1 and CH2 (vii) for Cohesive and Healthy Communities. This would end 20 years of the site being closed off by the owners while they have sought to use the site for a new school and associated development.</p> <p>Giving the local community access to the site would help to provide public open space in a Local Park Deficiency Area – (4.5.27 and 4.5.28), and space for community food growing in an area with no allotments currently available, and the limited sites that there are have closed their waiting lists (4.7.28).</p> <p>The proposals to rebuild Our Lady of Grace primary school at the site offers the ideal opportunity to secure open space for Charlton Community Gardens as part of the overall development.</p> <p>I would therefore urge the Council to consider this representation as part of the consultation on the Core Strategy Development Management Policies (Proposed Submission Version) in support of the proposed policies for Open Space and Cohesive and Healthy Communities.</p>					
	Policy OS1 Open Space	760197	Sarah Roseblade	Not specified	Not specified	<p>We welcome the Council’s current proposals to protect the open spaces of the Borough. These give local communities the chance to enjoy fresh air and tranquility in our increasingly busy lives, as well as improving health and well-being through activity and exercise.</p> <p>As a member of Charlton Community Gardens, we wish to take this opportunity to ensure that the only piece of open space in central Charlton at Highcombe, continues to be designated as Community Open Space in line with policies OS1, OS (b) and OS (c).</p> <p>Further, we would urge the Council to support our aim to open up some of this space as a community garden for local people. This would help specifically to deliver on policies CH1 and CH2 (vii) for Cohesive and Healthy Communities. This would end 20 years of the site being closed off by the owners while they have sought to use the site for a new</p>				<a href="#">340</a>	

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						<p>faith school and associated development.</p> <p>Giving the local community access to the site would help to provide public open space in a Local Park Deficiency Area – (4.5.27 and 4.5.28), and space for community food growing in an area with no allotments currently available, and the limited sites that there are have closed their waiting lists (4.7.28).</p> <p>The proposals to rebuild Our Lady of Grace primary school at the site offers the ideal opportunity to secure open space for Charlton Community Gardens as part of the overall development.</p> <p>We would therefore urge the Council to consider this representation as part of the consultation on the Core Strategy Development Management Policies (Proposed Submission Version) in support of the proposed policies for Open Space and Cohesive and Healthy Communities.</p>					
	Policy OS2 Metropolitan Open Land	757403	Mr Graeme Humphrey	Yes	No	<p>The London Plan Policy 7.17 seeks to protect the openness of Metropolitan Open Land (MOL). It also states that any alterations to the boundary of MOL should take place through the Local Development Framework preparation, and be considered against a set of criteria. It is our understanding that the consideration of any alterations will take place through the preparation of the Greenwich Site Specific Allocations Document and the Greenwich Proposals Map. This is set out in the Council's Local Development Scheme 2013, which states in Para 6.2 'The Proposals Map will be updated as and when required alongside the adoption of the Site Specific Allocations DPD'.</p> <p>On behalf of Bovis Homes Limited we will be making submissions throughout the preparation of both these seeking the exclusion of land off Blackheath Park from its current Metropolitan Open Land designation. This site comprises four derelict hard surfaced tennis courts and clubhouse, and makes no contribution to the openness of the Metropolitan Open Land, being contained within strong natural boundaries of hedgerows and trees, as well as by wire mesh fencing. The site is therefore not visually “open” and as such makes no contribution to “Metropolitan Open Land”.</p> <p>There has been a material change in circumstances with this site off Blackheath Park since its inclusion in the current Greenwich Proposals Map as MOL. It has been separated from the open land immediately to the south, which is now the newly created playing fields of the Thomas Tallis</p>	<p>Policy OS2 Metropolitan Open Land - (as proposed to be changed)</p> <p>All Metropolitan Open Land, as defined on the proposals map, (which will be updated alongside the adoption of the Site Specific Allocations Document), will be maintained and its open area protected from inappropriate development. The following uses are considered generally appropriate within Metropolitan Open Land unless they would result in an adverse change to the character of the land.</p>	757384	Mr Geoff Smith	Director of Planning  DMH Stallard LLP	<a href="#">14</a>

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						<p>Secondary School. This remaining separated site off Blackheath Park makes no contribution to the MOL, and instead has the character of previously developed land of no environmental value. Such land is specifically referred to in the National Planning Policy Framework 2012 (para 17) as land which should be reused. It is an ideal site for new housing fronting onto Blackheath Park. It has built housing development on three sides, with the fourth side separated from the playing fields by an extensive screen of hedgerows, trees, as well as wire mesh fencing. It also has an existing vehicular access onto Blackheath Park.</p> <p>Our objection to Core Strategy Policy OS2 as currently written is that there is no reference to the process of any alteration to the boundaries of the MOL in these subsequent Documents, as described above. It could therefore be concluded that the current MOL boundaries, as defined in the Greenwich Unitary Development Plan 2006 and Proposals Map, are to be retained on adoption of this Core Strategy. Therefore, to avoid this uncertainty, and to confirm that possible alterations to the Metropolitan Open Land (such as the land off Blackheath Park) will be considered through the preparation of the Greenwich Site Specific Allocations Document and Proposals Map, which we understand will be during 2013 / 2014, we propose the following change to Policy OS2</p>					
	Policy OS2 Metropolitan Open Land	755935		Not specified	No	<p>Prior to the undertaking of an update of the OSS, it is contended that confirming the extent of area to which this policy can be applied is both premature and ‘unsound’.</p> <p>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 London Plan, addressing MOL, in that it states that inappropriate development should be refused except in very special circumstances. The supporting text to Policy OS2 goes on to highlight that MOL is protected in line with the London Plan, but does not specifically mention the exception of very special circumstances.</p>	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 London Plan. This is also to allow greater flexibility if the circumstance were to arise as described above under ‘Proposals Map Proposed Changes’.	755933	Mr Mark Novelle	Planning  Deloitte Real Estate	<a href="#">380</a>
	Policy OS3 South East London Green Chain	147468	Mr David Hammond	Yes	Yes	Open Space Policies would benefit from clearer references to the NPPF and Policy OS3 could be strengthened by mentioning the All London Green Grid as well as the South east London Green Grid.					<a href="#">117</a>
	Policy OS4 Biodivers	502448	Mr Laurie	Not specified	Not specified	The Partnership welcomes your recognition of areas of geological importance and the need to protect them. The LGP supports the inclusion of Dog Rocks as a Regionally					<a href="#">103</a>

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	ity		Baker			<p>Important Geological and Geomorphological Site (RIGS) in Policy OS4.</p> <p>Since the publication of your 2010 draft, the LGP has done further work on geological sites in London and recommends two sites in the Royal Borough as LIGS (Locally Important Geological and Geomorphological Sites) that are in he 2012 version of ‘London’s Foundations’. These are:</p> <p>♣ GLA 56 Bleak Hill Sandpits (Grid reference TQ 4606 7776)</p> <p>♣ GLA 57 Wickham Valley Brickworks Complex (Grid reference TQ 4604 7743)</p> <p>LGP would like to see the inclusion of these two further sites into the Core Strategy.</p> <p>Footnote 24 gives the source as “London Foundations London Implementation Report 2009” – it should be “London’s Foundations: protecting the geodiversity of the capital, Supplementary Planning Guidance, Mayor of London, March 2012”.</p>					
	Policy OS4 Biodiversity	147829	Ms Anna Townend	Not specified	No	The impact of the extensive "new urbanisation" (by the RBG plannini policies) currently being implemented with over 70% of consents still pending completion has put at risk the borough's biodiverse inheritance. For the survival of species in urbanizing expansion and for future generations and community health and wellbeing this must be halted.	A moratorium on further implementation of current tower block consents for 1-2 bed flats along the River Thames corridor pending a "carrying capacity" of the land evaluation and a habitat creation policy adoption. Strengthening the current Biodiversity Action Plan which is disregarded by RBG and developers alike.				<a href="#">359</a>
	Policy OS4 Biodiversity	148486	Ms Wendy Shelton	Not specified	Not specified	Policy OS4 Biodiversity - the second bullet point covers Sites of Importance for Nature Conservation (SINC). At Table 4.4 Sites of Importance for Nature Conservation - Sites of Local Importance, we recommend that, at the entry for NC46 The Westcombe Woodlands, consideration be given to a redrafting of the description wording to reflect the current situation, on the lines of - Small secondary woodland, mainly sycamore, with dense scrub layer, mostly on a steep slope. Management plan being implemented to improve the biodiversity of the site, remove invasive species and conduct bird and other surveys. Small orchard recently planted. Local community involved through newly formed Friends organisation.					<a href="#">225</a>
	Policy TC(a) Core, Fringe and Local Shopping	502942		Yes	No	We write in order to make comment on this document, with particular reference to Policy TC (a) Core, Fringe and local Shopping Frontages. Please note that we act on behalf of the London Fire And Emergency Planning Authority (LFEPA) and that this representation is made on their behalf. For your information, the following LFEPA sites	We therefore suggest that the core frontage allocation omits the fire station in its entirety.	535279	Mel Barlow-Graham	Dron & Wright	<a href="#">27</a>

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	Frontages					<p>fall within the borough:-</p> <p>· East Greenwich Fire Station – 325 Woolwich Road, London SE7 7RF.</p> <p>· Eltham Fire Station – 266 Eltham High Street, London SE9 1BA.</p> <p>· Greenwich Fire Station – 4 Blisset Street, London SE10 8UP.</p> <p>· Lee Green Fire Station – 9 Eltham Road, London SE12 8ES.</p> <p>· Plumstead Fire Station – 1 Lakedale Road, Plumstead SE18 1PP.</p> <p>· Woolwich Fire Station – 24 Sunbury Street, Woolwich SE18 5LU.</p> <p>We consider the above named policy to be unsound, particularly in relation to the requirement for a minimum of 50% of frontage to be made available for A1 retail use on Lakedale Road/Plumstead High Street, where Plumstead fire station is located. LFEPA are currently considering the redevelopment/relocation of this site (as set out in the Asset Management Plan (2011)) to provide a new fire station. If the site is redeveloped, it will not be possible for a percentage to be dedicated to A1 use. Similarly, if the station is relocated, we consider it inappropriate to limit alternative use to 50% A1 on the ground floor.</p>					
	Policy TC(a) Core, Fringe and Local Shopping Frontages	147775	Mr Brian Regan	Yes	Yes	<ul style="list-style-type: none"><li>• There is a difference between Policy TC(a) which seeks 50% core frontage in Lee Green to be retained for A1 retail use, compared to Lewisham’s Development Management Local Plan recommended option 13 that seeks 70% of the primary shopping frontage at Lee Green maintained for A1 uses. Is this approach justifiable?</li></ul>					<a href="#">110</a>
	Policy TC(a) Core, Fringe and Local Shopping Frontages	148486	Ms Wendy Shelton	Not specified	Not specified	Table 4.1 District Shopping Frontages - at the entry for Blackheath (Village), there is a need to revisit Map 13 which shows the Blackheath Conservatoire at 19 Lee Road in the fringe shopping zone and indicates the deletion of 13 Lee Road from the fringe designation - the former is clearly a non-retail use property while the latter is clearly in retail use.					<a href="#">218</a>
	Policy TC(a) Core, Fringe	167326	Mayor of London	Not specified	Not specified	Policy TC(a) (page 79) uses terminology 'core, fringe and local frontages' which is not consistent with the London Plan terminology (Policy 2.15Da) or the NPPF terminology of 'primary and secondary frontages'. It would be helpful if					<a href="#">169</a>

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	and Local Shopping Frontages					the core strategy used the same terminology as the London Plan and NPPF - or alternatively, make it explicit whether 'core' frontages are the same as 'primary shopping frontages', and 'fringe' corresponds to 'secondary shopping frontages' if that is the case.					
	Policy TC(a) Core, Fringe and Local Shopping Frontages	167239		Not specified	Not specified	<p>GH note the aspirations of Policies TC(a) and TC(b) and supports the overall aim of ensuring the core shopping frontage is both maintained and controlled to ensure a suitably diverse retail mix.</p> <p>Policy TC(a) states that a minimum of 50% of core frontage in Greenwich town centre should be A1.</p> <p>The thresholds in this policy are reportedly informed by surveys of the Borough's retail shopping frontages, which were carried out in 2011 (para. 4.3.47). However, we have been unable to find any reference to this study within the Evidence Base section on RBG's website. As such, we request that this assessment is made available to the public and that we are given a further opportunity to submit representations, if deemed necessary.</p>		760672	Ed Britton	Deloitte Real Estate	<a href="#">391</a>
	Policy TC(b) Non-retail Uses in Protected Shopping Frontages	167326	Mayor of London	Not specified	Not specified	It is noted that there is a policy on betting shops in Policy TC(b) (page 80/81), but no mention of betting shops in the supporting justification this should be addressed.					<a href="#">170</a>
	Policy TC(b) Non-retail Uses in Protected Shopping Frontages	537756	Mr Richard Lee	Not specified	No	Policy TC b) should provide a definition for what amounts to a “saturation” of betting shops.	Policy TC b) should provide a definition for what amounts to a “saturation” of betting shops.				<a href="#">241</a>
	Policy TC(b) Non-retail Uses in Protected Shopping Frontages	167239		Not specified	Not specified	<p>Policy TC(b) sets out criteria against which proposals for non-retail uses in town centres are proposed to be determined. While GH broadly supports the provisions of the policy, we consider that criterion (v) is onerous, when read in conjunction with the provisions of Policy TC(a). As currently drafted, the policies would allow for a potential scenario where market demand provides only 50% of the town centre as Use Class A1, while at the same time being restricted on delivering any more than 25% of Use Classes A3, A4, A5.</p> <p>As the policies provide no provision for flexibility, the draft</p>	<p>It is recognised that TC(b) criterion (v) is largely, although not entirely, replicated from Policy TC18 of the adopted UDP. However, the proposed policy has omitted a key element from Policy TC18, which states:</p> <p>'Exceptions may be made to criterion (iii)—(v) for A3 restaurants, particularly in Eltham and Greenwich (see Policies TC10 and TC14). Exceptional cases must offer regular evening dining, and operators may be required to enter into a legal agreement to ensure this remains the case.</p>	760672	Ed Britton	Deloitte Real Estate	<a href="#">392</a>

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						Core Strategy is assuming that the remaining 25% of the core frontage will comprise Use Class A2, Sui Generis, or other non retail uses. We consider this scenario to be presumptuous and not founded on any reliable evidence, nor does it reflect the provisions of Policy TC1 and paragraph 4.3.3. We therefore ask that greater flexibility is incorporated into the wording of the policy to recognise the inherent variations in market demand and, in particular, the important role that A3 uses can make to improving the offer of the town as a visitor destination and in serving the needs of the local community.	<p>In the light of the need for greater flexibility to be incorporated into the policy, we request that the text from TC18 is replicated within the Core Strategy Policy TC(b).</p> <p>We also request that reference is made to the high profile of Greenwich town centre in relation to London's list of tourist attractions and the related need for leisure related uses. Greenwich town centre sits within the World Heritage Site Buffer Zone and is, therefore, not like other town centres within RBG. An example of the great value that is placed upon the area by Central Government is the E55 million investment into the restoration of the Cutty Sark and the surrounding area.</p> <p>We believe that it is inappropriate to apply such tight restrictions to the proportion of A1 and A3 uses within the context of the town centre's statutory designation and its high profile as a tourist destination, due to the inherently different retail requirements of the local demographic. There will continue to be greater demand for A3 uses in this location than in other town centres and this should be recognised through incorporation of greater flexibility.</p> <p>Incorporation of greater flexibility in relation to Greenwich town centre will help the retail provision to meet the needs of visitors as well as local residents and students alike, as the diversity of retail offer will still provide a suitable proportion of Use Class A1. Enabling greater flexibility within Policy TC(b) would help to deliver sustainable commercial development to support both day time and the night time economy.</p>				
	Policy TC(c) Hot Food Take-aways	167326	Mayor of London	Not specified	Not specified	There is reference in para 4.3.55 (page 82) to a 'policy' to restrict the establishment of hot food takeaways within 400m of schools, but there is no mention of this in the policy TC(c ). This should be addressed for consistency					<a href="#">171</a>
	Policy TC(c) Hot Food Take-aways	537756	Mr Richard Lee	Not specified	No	Policy TC c) on hot food takeaways should provide positive support for healthy food shops.	Policy TC c) on hot food takeaways should provide positive support for healthy food shops.				<a href="#">242</a>
	Policy TC1	634722	Crossrail	Not specified	Not specified	As above, we support the promotion of sustainable development in appropriate locations,		634723	Stephen	GVA Grimley	<a href="#">94</a>

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	Town Centres					<p>which includes Woolwich town centre. The inclusion of residential development in town centres</p> <p>is also welcomed due to the increased footfall it provides and the added vibrancy and</p> <p>expenditure that results. This approach is in accordance with paragraph 23 of the NPPF, which</p> <p>states that “residential use can play an important role in ensuring the vitality of centres”.</p>			Harrington		
	Policy TC1 Town Centres	147775	Mr Brian Regan	Yes	Yes	<p>• Policy TC1 envisages additional retail development (4,700 m2 convenience floorspace and up to 41,700 m2 comparison floorspace) within existing and planned town centres up till 2028. Policies EA1 and TC2 seek to improve the quality and positioning of Woolwich town centre, in order to re-classify it as a Metropolitan Centre and claw back trade from neighbouring boroughs. With this level of retail growth, will there be sufficient retail capacity in all town centres in neighbouring boroughs in South East London and West Kent to meet all of their retail aspirations?</p>					<a href="#">109</a>
	Policy TC1 Town Centres	148451	Tilfen	No	No	<p>We note that Policy TCI has been revised so as to expressly support residential development in Town Centres. We assume that this support includes all centres within the Council's hierarchy of own Centres including major, district and local centres. For clarity, we would recommend that Policy TC1 or the explanatory text confirm that all types of housing would be supported including for those with special needs (e.g. care homes, assisted living, etc).</p>	<p>For clarity, we would recommend that Policy TC1 or the explanatory text confirm that all types of housing would be supported including for those with special needs (e.g. care homes, assisted living, etc).</p>	382433	Mr Craig Blatchford	Blue Sky Planning	<a href="#">296</a>
	Policy TC1 Town Centres	148486	Ms Wendy Shelton	Not specified	Not specified	<p>Policy TC1 Town Centres - either in the wording of the policy itself or in one of the support paragraphs, there should be some indication that major centres and district centres are made up of core frontages and fringe frontages, as exemplified on the various maps in the Proposals Map Changes document.</p>					<a href="#">216</a>
	Policy TC1 Town Centres	537756	Mr Richard Lee	Not specified	No	<p>The policies are unsound because:-</p> <ul style="list-style-type: none"> <li>• They do not provide neighbourhood based investment and locally sensitive action to address social deprivation in the 20% most deprived areas</li> <li>• There is an over-emphasis on high density development in the major and district centres. More attention needs to be given to the local centres and neighbourhood parades, to support a more dispersed pattern of economic activity, including local sourcing and local procurement.</li> </ul>	<p>The following changes are needed:-</p> <p>i) All categories of town centre need to be protected as employment centres, putting jobs closer to homes and supporting sustainable communities.</p> <p>ii) Policy support for sustaining and enhancing the diversity of town centre retail, including support for improvements that will strengthen the attractiveness and competitiveness of local centres</p>				<a href="#">237</a>

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						<ul style="list-style-type: none"> <li>• There is a failure to recognise accessibility as a key concern</li> <li>• The absence of town centre health checks means there is no evidence of how far the existing town centres meet the requirements of sustainable communities and lifetime neighbourhoods.</li> </ul>	<p>iii) A requirement to improve the quality of the public realm and conditions for pedestrians and cyclists</p> <p>iv) A condition that residential development must not compromise local green space, heritage assets and the accessibility and affordability of local services.</p> <p>v) To be consistent with lifetime neighbourhoods there should be a local needs index of the shops, social and community facilities which are accessible to everyone e.g. within easy walking distance and measures to ensure access to older and disabled residents.</p> <p>vi) The definition of community uses needs to be more inclusive, including heritage and design as well as a range of community facilities. Deficiencies of health facilities, play areas, youth centres, sports, places of worship should be mapped spatially and responded to. It should be easier to change use from retail to community use.</p>				
	Policy TC1 Town Centres	760183	Cllr Spencer Drury	Not specified	Not specified	We do not consider that a blanket statement that “Residential development in Town Centres is supported.” as made in TC1 is necessary. Each development should be treated on its own merits and more residential development could undermine the integrity and survival of our High Street unless it is done in an appropriate manner.					<a href="#">314</a>
	Policy TC1 Town Centres	167239		Not specified	Not specified	The policy is broadly supported by GH. The policy recognises the diverse mixture of uses required in a town centre. The policy also states that residential development in Town Centres is supported, which aligns with GH's strategy of taking back control of currently disused upper floors and reinstating them as residential units in accordance with their originally intended use. Reinstating the residential uses in the town centre will help contribute towards its long term vitality. In this respect, we would also like to strongly support paragraph 4.3.3 that recognises the enhancement of town centres is vital to resist and reduce loss of market share to neighbouring boroughs and to attract businesses and shoppers from outside the borough. In turn, this will make a valuable contribution to their sustained economic growth.		760672	Ed Britton	Deloitte Real Estate	<a href="#">389</a>
	Policy TC1 Town Centres	760660	Sally Miles	Not specified	Not specified	CgMs welcomes the active approach taken to promoting substantial redevelopment throughout the Borough and agree that there are significant opportunities for further residential and commercial development including traditional employment, retail and leisure provision. Indeed,					<a href="#">373</a>

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						<p>the strategy recognises the significant role leisure and retail facilities play within the Greenwich area.</p> <p>It is acknowledged that the authority should seek to support town centres and to promote new district centres to provide facilities for local residents.</p> <p>However, the policy framework should also enable individual proposals that may come forward during the lifetime of the Core Strategy to be determined on their own merits. It is not possible to envisage all potential retail and commercial opportunities that may come forward during the plan period. Some specific retail operators may identify specific requirements for the area which can provide valuable services to residents and can also provide significant employment opportunities more than comparable to traditional employment uses. The Plan should incorporate a criteria based policy reflecting the standard criteria contained within the NPPF to enable proposals to be considered on their own merits.</p> <p>In addition, there are a number of existing retail parks which serve the needs of the area. Existing retail parks should be identified and allocated and policy should support proposals to redevelop or enhance the facilities provided within these established retail locations.</p>					
	Policy TC2 Woolwich Town Centre	634722	Crossrail	Not specified	Not specified	<p>As stated above, the inclusion of residential development in town centres can result in added</p> <p>vibrancy and greater local expenditure. In accordance with this and to align with Policy TC1, a</p> <p>reference should be made to the appropriateness of residential use in Woolwich town centre.</p>		634723	Stephen Harrington	GVA Grimley	<a href="#">95</a>
	Policy TC2 Woolwich Town Centre	147465	Graham Saunders	Not specified	Not specified	<p>Woolwich town centre has a rich heritage recognised through designation, such as the Royal</p> <p>Arsenal conservation area and associated listed buildings; and to the south Woolwich</p> <p>Common conservation area and a range of listed buildings. However there is also a number</p> <p>of important other buildings and townscape features that are not formally recognised but</p> <p>which do have heritage interest. The Woolwich Town Centre Masterplan SPD provides</p> <p>useful evidence of these features including the potential to</p>					<a href="#">190</a>

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						<p>designate a new conservation area centred on Powis Street, Hare Street and the group of buildings that form the Bathway.</p> <p>We would urge you to recognise the heritage values identified in the Masterplan in this plan</p> <p>and to include a general reference in the policy of the heritage significance of the town centre</p> <p>and its potential to deliver positive change.</p>					
	Policy TC2 Woolwich Town Centre	166965	Berkeley Homes	Not specified	Not specified	Residential development within Woolwich Town Centre is vital to creating a sustainable, viable and vibrant town centre. Therefore we feel that a bullet point regarding residential development should be added to Policy TC2. This amendment would help to align Policy TC2 with paragraph 23 (bullet point 9) in the NPPF which seeks to encourage residential development on appropriate town centre sites so town centres are active places throughout the day/night.		188419	Mr Bob McCurry	Senior Planner Barton Willmore	<a href="#">405</a>
	Policy TC2 Woolwich Town Centre	537756	Mr Richard Lee	Not specified	No	Woolwich is turning its back on its past and it is hard to knit the town centre together, Woolwich has good rail connections, but they may not have the money for Crossrail, which will affect the ability for the town centre to grow. There is a lot of unused public space in Woolwich, but no interim uses strategy.					<a href="#">239</a>
	Policy TC3 Eltham Town Centre	630863	Transport for London	Not specified	Not specified	<p>TfL supports proposals to implement bus priority measures to reduce traffic</p> <p>congestion and improve pedestrians safety in Eltham Town Centre. However,</p> <p>given that these measures are not part of any TfL funded programme, RB</p> <p>Greenwich would be required to secure funding towards these schemes</p> <p>through alternative mechanisms such as the Local Implementation Plan (LIP).</p>					<a href="#">68</a>
	Policy TC3 Eltham Town Centre	147465	Graham Saunders	Not specified	Not specified	<p>As with Woolwich, Eltham town centre includes a variety of listed buildings and is to the</p> <p>south bordered by Eltham Palace conservation area. These heritage assets all contribute to</p> <p>the function, attractiveness and future growth of the town centre. This should be recognised</p>					<a href="#">191</a>

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						in the policy and supporting text.					
	Policy TC3 Eltham Town Centre	147698	Laurie Baker	Not specified	Not specified	<p>Policy TC3 on Eltham Town Centre sets out how it will be enhanced through redevelopment within the existing boundary by additional and improved retail floor space and improving the range of restaurants and leisure facilities. However, town centres are about more than retailing, restaurants and leisure: town centres should also be places where development for other forms of working and living are encouraged. Thus there is a strong case for attracting workshops, offices, and residential developments, mixed with the activities already stated in TC3.</p> <p>Additionally, the policy states two transport measures to improve Eltham (bus priority to reduce congestion and improve public and pedestrian safety and comfort, and improving north/south links). These should not be the only considerations. The Society finds it difficult to understand how bus priority on its own improves public and pedestrian safety and comfort.</p>	<p>To make the town centre work, good access for all users on foot, cycle, bus, and car, including car parking provision for visitors and workers needs to be provided and/or enhanced. This is addressed to some extent in the Masterplan but a stronger policy in the Core Strategy is needed to reinforce the Masterplan.</p> <p>The supporting text to policy TC3 repeats the same questionable statements as in the 2010 draft of the Core Strategy. Paragraph 4.3.19 states “Eltham has an above average comparison goods representation...” with “...limited capacity for further comparison goods shopping ... as the Centre already has a good comparison offer” and paragraph 4.3.20 “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 Society questions these statements as they are based on an out-of-date 2008 study conducted before the financial crisis that exacerbated the problems of town centres. The Society was involved in the survey of town centre users conducted by the Eltham Town Centre Partnership in 2012, which indicated the views of people actually using the Eltham town centre.</p>				<a href="#">153</a>
	Policy TC3 Eltham Town Centre	760183	Cllr Spencer Drury	Not specified	Not specified	With regard to TC3, can we suggest once again that with the development of additional population at the Kidbrooke Village, longer trains are absolutely essential to ensure that commuting from Eltham or Kidbrooke is not over-crowded. We would also like to see a clearer commitment to cycling as part of the plan and the way it can be supported and developed in our town centre.					<a href="#">315</a>
	Policy TC4 Greenwich Town Centre	147465	Graham Saunders	Not specified	Not specified	<p>We welcome the explicit reference to the protection and enhancement of the historic environment that informs the character of Greenwich town centre, and the cross referencing of this policy with policies DH3 and DH4. This approach should be applied to policies TC2 and TC3.</p>					<a href="#">192</a>
	Policy TC4 Greenwich	501408	Mr John	Not specified	No	The policy states: “The Council will protect and enhance the historic character of Greenwich Town Centre whilst also .....” In our response to the Draft Core Strategy, we said	Explanation should be given as to a) why the Council has watered down its policy and, b) explanation given as positive ways the Council				<a href="#">137</a>

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	h Town Centre		Franklin			that the Society supports this policy, but the issue of “enhancing” the TC is long-standing: we would welcome further explanation of how this aspiration is to be achieved. The Council’s response to this (Who Said What? Consultation Portal) was just to draw attention to existing design guidance which “may be updated in the future if appropriate.” Meanwhile the policy has been watered down from saying, “This will be achieved by...” to, “The Council will support – with no justification for this change. The policy is not ‘effective’ in that it fails to set out positive ways in which it will ‘enhance’ the historic character of Greenwich Town Centre.	“will protect and enhance the historic character of Greenwich Town Centre” (our italics) - we do not consider that the Council’s response to our earlier criticism meets the situation, and consider the Council should be more pro-active.				
	Policy TC4 Greenwich Town Centre	537756	Mr Richard Lee	Not specified	No	In Greenwich town centre, small shops are starting to be displaced to be converted to townhouses . During the Olympics, the town centre was pedestrianized which felt great for the town centre but the traffic was rerouted through social housing areas, causing problems with air quality. The town centre is lacking facilities – not adequate toilets in the area despite tourist attractions being present					<a href="#">240</a>
	Policy TC4 Greenwich Town Centre	167239		Not specified	Not specified	The policy is broadly supported by GH, but we consider that there is an opportunity to identify a wider range of proposals that the Council will support, to help deliver strategic improvements across the town centre. This will provide RBG with a clearer policy framework which can be considered when determining future development.	<p>In this respect, we ask for the following two bullets to be included in the list of Developments the Council will support;</p> <ul style="list-style-type: none"> <li>• Change of Use to provide residential accommodation on upper floors within the core retail frontage, or at ground and basement floors outside the core retail frontage.</li> <li>• Improvements to Greenwich Market, to maintain its historic character, secure its long term viable use and meet the needs of all visitors.</li> </ul> <p>Furthermore, we consider that there is a need for Policy TC4 to explicitly align itself with the provisions of paragraph 3.1.2, by amending the text as follows:</p> <p>"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, a centre for tertiary education and meeting the needs of local business."</p> <p>Inclusion of this additional sentence within the policy will aid both decision makers and applicants and help to ensure a consistent approach is adopted over the life of the Core Strategy.</p> <p>Within this context, we also request that reference</p>	760672	Ed Britton	Deloitte Real Estate	<a href="#">390</a>

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							to 'providing a diverse and healthy local economy' is added to paragraph 3.3.29, to sit alongside the other roles listed. GH recognises that such an approach is identified within the provisions of Policy TC1 and consider that the addition of these suggested elements to other parts of the Core Strategy will help to ensure a more consistent aspiration for Greenwich Town Centre.				
	Policy TC5 North Greenwich District Centre	248000	Mrs Clare Loops	Yes	No	The proposed district centre at North Greenwich only shows a boundary around the area, but no primary or secondary retail frontages have been set out. This appears incongruous to the approach taken with other town centres, where frontages are set out, and it is recommended that retail frontages be set out for the proposed North Greenwich district centre. Policy TC5 and supporting paragraphs 4.3.34 and 4.3.35 set out that this district centre will be leisure led, and that the total retail floorspace ‘should not exceed the typical upper floorspace figure for a District Centre of 50,000m² as set out in the London Plan. If the retail frontages are not set out on Map 9 or in Table 4.1, then it is not possible to estimate if this proposed district centre is in general conformity with the London Plan.					<a href="#">79</a>
	Policy TC5 North Greenwich District Centre	166972	Cathedral Group	Yes	No	<p>Cathedral Group supports the proposal for a new leisure led District Centre at Greenwich Peninsula to complement the o2 Arena. This will encourage greater activity on the Peninsula, particularly on non event days at the o2.</p> <p>This approach is consistent with the adopted Greenwich Peninsula West Masterplan.</p> <p>We do question, however, whether there will be a sufficient retail provision on the Peninsula. Whilst retail outlets are proposed in the vicinity of the o2, there needs to be consideration of whether this level will be enough to serve the needs of the large number of new visitors and residents proposed for the whole Peninsula.</p>		188810		Nathaniel Lichfield and Partners	<a href="#">513</a>
	Policy TC5 North Greenwich District Centre	762451	Laura Williams	Yes	No	<p>The Core Strategy clearly states in several policies (including TC1 Town Centres, CH1 Cohesive Communities, EA1 Economic Development) and supporting statements, the importance of arts and cultural community facilities and open spaces in sustainable development and the regeneration of the Borough’s Town Centres; their vitality and viability, their contribution to the local economy, as well as the creation of cohesive and healthy communities.</p> <p>However, Policy TC5 North Greenwich District Centre clearly does not include for this diversity in its cultural and social/community infrastructure; it is solely based around</p>	<p>Policy TC5 North Greenwich District Centre</p> <p>A new leisure-led District Centre will be created at Greenwich Peninsula to complement The O2 Arena. The Centre will perform a specialist role by catering for the entertainment and leisure needs of national and international visitors, as well as providing for workers and residents of the Borough. The Centre will comprise:</p> <p>The 26,000 capacity The O2 Arena entertainment venue; Sports, leisure and retail outlets in the vicinity of The O2; public arts, cultural and other</p>				<a href="#">483</a>

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						<p>the commercial leisure/entertainment offered by The O2.</p> <p>Given the level of proposed housing development in North Greenwich, and the Borough’s ambition to expand and diversify its tourism industry by securing the position of the waterfront area including the Maritime Greenwich World Heritage Site, the Peninsula and the Royal Arsenal as a major tourism centre for the Thames Gateway (Policy EA5); Policy TC5 is therefore unsound as it does not reflect the other policies.</p> <p>The NPPF explicitly recognises that cultural facilities contribute to the overall wellbeing of communities (see for example paragraphs 23 and 70 of the NPPF).</p> <p>The London Plan also supports the development of cultural facilities such as new projects like Aluna:</p> <p>“LP Policy 4.6 The Mayor will and boroughs and other stakeholders should support the continued success of London’s diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors...</p> <p>Boroughs should...</p> <p>(d) promote and develop existing and new cultural and visitor attractions especially in outer London and where they can contribute to regeneration and town centre renewal...”</p>	<p>community facilities sympathetic to the cultural needs and heritage of the Peninsula (such as the Aluna moon clock) and New high quality office space.</p> <p>Support</p> <p>4.3.34 Greenwich Peninsula is identified in the London Plan 2011 as an Opportunity Area. The Plan recognises that the Peninsula has the land capacity for a significant amount of development. The Peninsula will be a strategic housing and employment location for the Borough and with the Jubilee Line connections there is an opportunity to develop a new leisure-led District Centre which not only provides for the retail, cultural and social/community needs of workers and the local population but attracts people from a wider catchment area for leisure purposes, focused around The O2 Arena, the most popular indoor entertainment venue in the world,</p>				
	Policy TC5 North Greenwich District Centre	762451	Laura Williams	Yes	No	<p>The Core Strategy clearly states in several policies (including TC1 Town Centres, CH1 Cohesive Communities, EA1 Economic Development) and supporting statements, the importance of arts and cultural community facilities and open spaces in sustainable development and the regeneration of the Borough’s Town Centres; their vitality and viability, their contribution to the local economy, as well as the creation of cohesive and healthy communities.</p> <p>However, Policy TC5 North Greenwich District Centre clearly does not include for this diversity in its cultural and social/community infrastructure; it is solely based around the commercial leisure/entertainment offered by The O2.</p> <p>Given the level of proposed housing development in North Greenwich, and the Borough’s ambition to expand and diversify its tourism industry by securing the position of the waterfront area including the Maritime Greenwich World</p>	<p>Policy TC5 North Greenwich District Centre</p> <p>A new leisure-led District Centre will be created at Greenwich Peninsula to complement The O2 Arena. The Centre will perform a specialist role by catering for the entertainment and leisure needs of national and international visitors, as well as providing for workers and residents of the Borough. The Centre will comprise:</p> <p>The 26,000 capacity The O2 Arena entertainment venue; Sports, leisure and retail outlets in the vicinity of The O2; public arts, cultural and other community facilities sympathetic to the cultural needs and heritage of the Peninsula (such as the Aluna moon clock) and New high quality office space.</p> <p>Support</p>				<a href="#">484</a>

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						<p>Heritage Site, the Peninsula and the Royal Arsenal as a major tourism centre for the Thames Gateway (Policy EA5); Policy TC5 is therefore unsound as it does not reflect the other policies.</p> <p>The NPPF explicitly recognises that cultural facilities contribute to the overall wellbeing of communities (see for example paragraphs 23 and 70 of the NPPF).</p> <p>The London Plan also supports the development of cultural facilities such as new projects like Aluna:</p> <p>“LP Policy 4.6 The Mayor will and boroughs and other stakeholders should support the continued success of London’s diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors...</p> <p>Boroughs should...</p> <p>(d) promote and develop existing and new cultural and visitor attractions especially in outer London and where they can contribute to regeneration and town centre renewal...”</p>	<p>4.3.34 Greenwich Peninsula is identified in the London Plan 2011 as an Opportunity Area. The Plan recognises that the Peninsula has the land capacity for a significant amount of development. The Peninsula will be a strategic housing and employment location for the Borough and with the Jubilee Line connections there is an opportunity to develop a new leisure-led District Centre which not only provides for the retail, cultural and social/community needs of workers and the local population but attracts people from a wider catchment area for leisure purposes, focused around The O2 Arena, the most popular indoor entertainment venue in the world,</p>				
	Policy TC6 Other District Centres	147465	Graham Saunders	Not specified	Not specified	<p>Many of the other Royal Borough centres contain a range of heritage assets that contribute</p> <p>to and that can be used to help generate future growth. For example Blackheath contains a</p> <p>rich historic environment of which large parts are designated which is neither recognised in</p> <p>the policy or discussed it the supporting text. We would therefore encourage both policies</p> <p>and their supporting text to recognise known and potential heritage interests found in District</p> <p>and Local centres; and Neighbourhood Parades</p>					<a href="#">193</a>
	Policy TC6 Other District Centres	148486	Ms Wendy Shelton	Not specified	Not specified	<p>Policy TC6 Other District Centres - either in the wording of the policy itself or in one of the support paragraphs, there is a need to highlight that the majority of the Blackheath (Village) district centre lies within the Lewisham borough on similar lines to the entry at paragraph 4.3.39, relating to the Lee Green district centre.</p>					<a href="#">217</a>
	Policy TC7	757325	Jagruti	Yes	No	<p>We support the objectives of draft Policy TC7 and in particular the enhancement of retail and other services.</p>	<p>The Council will support the enhancement of Local Centres and Neighbourhood Parade, and encourage</p>	757321	Mr	Associate	<a href="#">28</a>

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	Local Centres and Neighbourhood Parades		Joshi			However, we question how this objective will be delivered without a positive policy intervention and an understanding of the function of each of the local centres, the role that it plays in the area and the capacity of the centre for change. For example, the policy seeks to increase the size of Blackheath Hill Local Centre by including several frontages that were not included in the UDP policy. However, these additions do not go far enough and there is no assessment on how other sites (such as the retail units at 100 Blackheath Road) could assist in meeting the objectives set out. These units should be included in the boundary of the local centre and should be promoted for intensification of uses including retail, other town centre uses and residential.	retail and services that are appropriately scaled to serve the needs of their local catchment. The boundaries of these centres will be reviewed having regard to their function and ability to meet local identified needs.		Stephen Rose	Indigo Planning	
	Policy TC7 Local Centres and Neighbourhood Parades	148464	Mr Lawrence Smith	Yes	No	The policy is inadequate because there is no reference to rental costs in influencing the vitality of neighbourhood parades, and to the role of the Council in setting rents.	Add the following sentence to the first paragraph: "Where the Council is in a position to influence rents, it will take full account of the social benefits of local centres and neighbourhood parades."				<a href="#">36</a>
	Policy TC7 Local Centres and Neighbourhood Parades	757596	The Charlton Society	Yes	No	Planning applications for change of use are treated unreliably because issues are reduced to purely quantitative ones.	Because they can affect the needs and wishes of hundreds of local people, change-of-use application approvals or rejections must be subject to consultation with local people and community groups.				<a href="#">49</a>
	Policy TC7 Local Centres and Neighbourhood Parades	537756	Mr Richard Lee	Not specified	No	There should be a policy to support small shops and a definition of neighbourhood parades (how many shops does this include?)	There should be a policy to support small shops and a definition of neighbourhood parades (how many shops does this include?)				<a href="#">238</a>
Local Centre Shopping Frontages	Table 4.2	248000	Mrs Clare Loops	Not specified	Not specified	Whilst not an issue regarding the soundness of the documents, It is noted that Abbey Wood is designated a local centre in table 4.2. However, this centre becomes larger once the Bexley neighbourhood parade is added into the mix, and with the advent of the CrossRail station at Abbey Wood, there may be scope, working jointly with London Borough of Bexley, to increase the importance of this local shopping area.					<a href="#">78</a>