

## Appendix 27: Statement of Representations; Proposed Submission Version Proposals Map Changes Consultation Responses Report

Title	Number	Person ID	Full Name	Is the DPD legally compliant?	Is the DPD sound?	Reasons for compliance and soundness	Changes necessary for legal compliance and soundness	Person ID	Full Name	Organisation Details	Comment ID
Design and Heritage Designations	2.4	757292	Mr John Parmiter	Yes	No	<p>Manor Way /The Willows sites, Blackheath Park, London SE3</p> <p>The sites comprise two privately-owned former sports grounds, with no public access, on the edge of Blackheath Park – Manor Way and The Willows:</p> <p>The Manor Way site takes access through the Cator Estate, a gated private estate; it has 3 crossovers. The site is laid to grass and was once a sports ground .</p> <p>The Willows has been affected by the Environment Agency's flood alleviation works to the Quaggy River, which it borders. The site, which is still subject to flooding has a vehicular access off Weighall Road.</p> <p>Together, the sites comprise some 16 acres; though about an 1 acre has been lost to the Environment Agency's new flood alleviation works in the western corner of the Willows, south of the Quaggy River.</p> <p>There are two further sports grounds to the south: The Council own the Weighall Road playing fields (S048), which are subject to flooding (and have no changing facilities). To the west is the Sunray Sports Ground (S071). The EA retains much of the playing fields (some 7½ acres), which have been enclosed with a new retaining structure, following the flood alleviation works.</p> <p>The Manor Way/Willows sites have been disused as playing facilities since 1999/2001 respectively and their premises remained seriously vandalised until demolished; they have no facilities; remain liable to flooding and are too small to be viable by current standards. In all the circumstances re-use is not a viable proposition</p> <p>A permanent long-term solution is needed and one that gives them a positive future that can contribute to the well-being of the local community. A small enabling residential development is seen as the way forward, funding a new public park (and possibly a</p>	The MOL boundary needs to be reviewed as part of a long-term solution to these sites, allowing a modest enabling housing development.	757289	Mr John Parmiter		<a href="#">1</a>

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						<p>maintenance depot) for the Cator Estate. Given the site's designation as Metropolitan Open Land (MOL) and part of London's Green Chain, a permanent solution to future boundaries is needed. This kind of re-ordering was very much part of the way the future planning of Kidbrooke was secured.</p>					
Open Space Designations	2.5	757292	Mr John Parmiter	Yes	No	<p>Manor Way /The Willows sites, Blackheath Park, London SE3</p> <p>The sites comprise two privately-owned former sports grounds, with no public access, on the edge of Blackheath Park – Manor Way and The Willows:</p> <p>The Manor Way site takes access through the Cator Estate, a gated private estate; it has 3 crossovers. The site is laid to grass and was once a sports ground .</p> <p>The Willows has been affected by the Environment Agency's flood alleviation works to the Quaggy River, which it borders. The site, which is still subject to flooding has a vehicular access off Weighall Road. Together, the sites comprise some 16 acres; though about an 1 acre has been lost to the Environment Agency's new flood alleviation works in the western corner of the Willows, south of the Quaggy River.</p> <p>There are two further sports grounds to the south: The Council own the Weighall Road playing fields (S048), which are subject to flooding (and have no changing facilities). To the west is the Sunray Sports Ground (S071). The EA retains much of the playing fields (some 7½ acres), which have been enclosed with a new retaining structure, following the flood alleviation works.</p> <p>The Manor Way/Willows sites have been disused as playing facilities since 1999/2001 respectively and their premises remained seriously vandalised until demolished; they have no facilities; remain liable to flooding and are too small to be viable by current standards. In all the circumstances re-use is not a viable proposition.</p> <p>A permanent long-term solution is needed and one</p>	The MOL boundary should be reviewed, to allow some modest enabling housing to fund the creation of a new public park.	757289	Mr John Parmiter		<a href="#">2</a>

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						that gives them a positive future that can contribute to the well-being of the local community. A small enabling residential development is seen as the way forward, funding a new public park (and possibly a maintenance depot) for the Cator Estate. Given the site's designation as Metropolitan Open Land (MOL) and part of London's Green Chain, a permanent solution to future boundaries is needed. This kind of re-ordering was very much part of the way the future planning of Kidbrooke was secured.					
Map 18 - Blackheath Hill Local Centre Frontage	3.18	757325	Jagruti Joshi	Yes	No	<p>The DPD is unsound as it is not positively prepared and is not consistent with national policy contained in the NPPF. The DPD seeks to amend the frontages of several centres within the Borough, including the retail frontage of Blackheath Hill Local Centre. The DPD does not comply with paragraph 23 of the NPPF as the policy is not positive and it does not set out a policy for management and growth of the centre. The principal issue with the proposed changes is that they do not go far enough in identifying the extent of the centre and the role that this centre can play in terms of growth in both retail and other uses (such as residential). The centre has obviously grown since the last iteration of the development plan (as evidenced by the need to include additional frontages within the centre), however, the changes proposed were based on a survey that took place in 2011 (ie. pre the publication of the NPPF) and this survey is now out-of-date. Since 2001 there has been a shift in emphasis in national policy that obliges the council to promote the growth of centres and recognise the individuality of the centres and the roles that each centre plays.</p> <p>The 2006 UDP noted that Blackheath Hill Local Centre was in prolonged decline and that little of its retail function remained (para 8.13). However, this trend has now been reversed and the centre is growing and becoming more attractive to occupiers. The Policy should have used the evidence base to consider the role that the centre can play and whether even further expansion is possible. In this regard, the site at 100 Blackheath Road should have been considered for its potential to accommodate more intensive development that might allow the centre to</p>	The boundary proposed for Blackheath Hill Local Centre should be extended to include the retail units at 100 Blackheath Road. These units are physically connected to the centre and form part of the centre. They are in position to be developed so that the centre continues its reversal of fortunes and offer sufficient sites for the centre to continue growing in accordance with national policy.	757321	Mr Stephen Rose	Associate Indigo Planning	<a href="#">5</a>

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						<p>grow.</p> <p>However, the draft policy fails to do this. There are several reasons why this may be the case, however, the main reason appears to be the lack of any evidence base on the role and function of the centre. The retail evidence base dated October 2008 is extremely out-of-date and cannot be used as a basis for any future retail projections in terms of quality and quality of future allocations. The report itself states that any projections after 2012 should be treated with caution and that further assessment should be carried out after that date. Therefore, the evidence base underpinning the retail strategy does not comply with the requirements of paragraph 23 of the NPPF which states that "LPAs should undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites". A further significant criticism of the retail evidence base is that it does not assess all town centres within the Borough. Town centres (as set out in the NPPF) include "city centres, town centres, district centres and local centres". The evidence base does not include any information on Blackheath Hill Local Centre, no assessment of its role, no indication of its success or any other measures that would allow the policy to consider the expansion of the centre in order for this to comply with national policy. The only thing that appears to have happened in relation to this centre (and we assume that this applies to all local centres) is that a visual survey has been undertaken of the active frontages and these have been added to the centre. This approach goes nowhere near the requirements of the NPPF and is clearly unsound.</p> <p>The Council requires an up-to-date retail assessment that considers the role of every town centre within it. Once this has been procured, then the Council will need to objectively consider the exact boundaries of each centre, having regard to the role that each centre will have to play in the future and to any sites, such as 100 Blackheath Road, which might contribute to its growth.</p>					
Open Space	2.5	757514	RAGED	No	No	The documentation of Open Space usage and	The DPD is not compliant because it is				<a href="#">3</a>

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Designations			Residents RAGED RAGED			<p>allocation of the DPD based on Map 5.5 Local Park Deficiency Area is wrong and has been confirmed with the Parks Department. (There is also other areas elsewhere that should be reconsidered).</p> <p>Land adjacent to Greenwich University Avery Hill Campus is marked as Public open Space.</p> <p>These areas are not Open To Public Use!</p> <p>The boundary for Local Park deficiency is therefore too wide and a number of Residential Properties in the Avery Hill and adjacent Bexley borough Do Have Local Park Deficiency!</p> <p>This in itself is grounds for faulting the document Map 5.5.</p> <p>However, the correct deficiency boundary once properly drawn puts the Gaelic Athletic Sports Ground - 132 Avery Hill Road SE9 into the Deficiency of Local Parks Area.</p> <p>We therefore propose that the Local Community wish to have the Gaelic Athletic Sports Ground designated as Metropolitan Open Land to further protect its Open Space Status.</p> <p>The Gaelic Athletic Sports Ground has been under threat of development for 50 years and its protection has been supported by Greenwich Council, The Local MP and the Secretary of State. All the way to the High Court.</p> <p>The Land Owner has been belligerent and neglectful of the Gaelic Athletic Sports Ground. They have their own rules to prevent its use for anything but Gaelic Sports. They also wish to capitalise on a proven needed Open Space Park resource shown clearly in Map 5.5 by obtaining planning permission.</p> <p>We therefore expect that the status of this Gaelic Athletic Sports Ground will be upgraded in line with Policy 4.5 of the DPD and statement in the DPD and NPPF to "Metropolitan Open Land", as Green Belt Land, to prevent further expensive attempts to get</p>	<p>supported by maps which are out of date and incorrect. Therefore the documentation of Open Space usage and allocation of the DPD based on Map 5.5 Local Park Deficiency Area should be corrected.</p> <p>Land adjacent to Greenwich University Avery Hill Campus is marked as Public open Space and should be removed from the plan and the Local Park Deficiency Area corrected.</p> <p>This should define the area of Local Park deficiency to include a number of Residential Properties in the Avery Hill and adjacent Bexley borough.</p> <p><b>MOST IMPORTANTLY:-</b></p> <p>The Local Park Deficiency boundary puts the Gaelic Athletic Sports Ground - 132 Avery Hill Road SE9 into the Deficiency of Local Parks Area.</p> <p>Therefore the Gaelic Athletic Sports Ground should receive upgraded designation to "Metropolitan Open Land" to further protect its Open Space Status.</p> <p>This would also remove the area of Local Park Deficiency and produce a Valuable New Open Space at the Gaelic Athletic Sports Ground</p> <p>in line with Policy 4.5 of the DPD and statement in the DPD and NPPF to "Metropolitan Open Land", as Green Belt Land.</p>				

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						Planning Approval. Also to ensure opening up of this valuable and needed resource to the public in the spirit and letter of the DPP.					
Open Space Designations	2.5	757514	RAGED Residents RAGED RAGED	No	No	<p>The documentation of Open Space usage and allocation of the DPD based on Map 5.5 Local Park Deficiency Area is wrong and has been confirmed with the Parks Department. (There is also other areas elsewhere that should be reconsidered).</p> <p>Land adjacent to Greenwich University Avery Hill Campus is marked as Public open Space.</p> <p>These areas are not Open To Public Use!</p> <p>The boundary for Local Park deficiency is therefore too wide and a number of Residential Properties in the Avery Hill and adjacent Bexley borough Do Have Local Park Deficiency!</p> <p>This in itself is grounds for faulting the document Map 5.5.</p> <p>However, the correct deficiency boundary once properly drawn puts the Gaelic Athletic Sports Ground - 132 Avery Hill Road SE9 into the Deficiency of Local Parks Area.</p> <p>We therefore propose that the Local Community wish to have the Gaelic Athletic Sports Ground designated as Metropolitan Open Land to further protect its Open Space Status.</p> <p>The Gaelic Athletic Sports Ground has been under threat of development for 50 years and its protection has been supported by Greenwich Council, The Local MP and the Secretary of State. All the way to the High Court.</p> <p>The Land Owner has been belligerent and neglectful of the Gaelic Athletic Sports Ground. They have their own rules to prevent its use for anything but Gaelic Sports. They also wish to capitalise on a proven needed Open Space Park resource shown clearly in Map 5.5 by obtaining planning permission.</p>	<p>The DPD is not compliant because it is supported by maps which are out of date and incorrect. Therefore the documentation of Open Space usage and allocation of the DPD based on Map 5.5 Local Park Deficiency Area should be corrected.</p> <p>Land adjacent to Greenwich University Avery Hill Campus is marked as Public open Space and should be removed from the plan and the Local Park Deficiency Area corrected.</p> <p>This should define the area of Local Park deficiency to include a number of Residential Properties in the Avery Hill and adjacent Bexley borough.</p> <p><b>MOST IMPORTANTLY:-</b></p> <p>The Local Park Deficiency boundary puts the Gaelic Athletic Sports Ground - 132 Avery Hill Road SE9 into the Deficiency of Local Parks Area.</p> <p>Therefore the Gaelic Athletic Sports Ground should receive upgraded designation to "Metropolitan Open Land" to further protect its Open Space Status.</p> <p>This would also remove the area of Local Park Deficiency and produce a Valuable New Open Space at the Gaelic Athletic Sports Ground</p> <p>in line with Policy 4.5 of the DPD and statement in the DPD and NPPF to "Metropolitan Open Land", as Green Belt Land.</p>				<a href="#">4</a>

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						We therefore expect that the status of this Gaelic Athletic Sports Ground will be upgraded in line with Policy 4.5 of the DPD and statement in the DPD and NPPF to "Metropolitan Open Land", as Green Belt Land, to prevent further expensive attempts to get Planning Approval. Also to ensure opening up of this valuable and needed resource to the public in the spirit and letter of the DPP.					
Open Space Designations	2.5	757514	RAGED Residents RAGED RAGED	No	No	<p>This Open Space designations is based on the Greenwich Open Space Study, which was published in 2008.</p> <p>That document is therefore over 5 years old and was out of date when it was published.</p> <p>It is therefore not sound to Base the DPD supporting documentation on such an old document.</p> <p>It has been proved and agreed by the Parks department that the Open Spaces designations on Map 5.5 supporting the Greenwich Open Space Study is incorrect. There are more than just the 2 areas in the Avery Hill area, marked 245, not being correctly designated.</p> <p>These are deficiencies which spawn lack of effectiveness of this Open Space Designations and therefore the DPD which it feeds.</p> <p>As decisions and actions are likely to be taken as the DPD is formalized, with these out of date evidences supporting it, It should be required that any part of the DPD that can be shown to be undermined by these deficient documents should be required to have updates made before any action or other change takes place under the guidance of the DPD.</p> <p>Further, these supporting documents contain Policy and recommendations which are similarly out of date. These documents were also not tested in the community before publication. So adoption of these documents as support to the DPD is likewise unsafe and ineffective.</p> <p>All supporting documents used as evidence to</p>	<p>The following requirements should be written into the DPD.</p> <p>Greenwich Open Space Study, should be given public community scrutiny before being permitted to be used to support decisions or actions under the auspices of the DPD.</p> <p>All supporting documents used as evidence to support future actions after formalization of the DPD should be given public community scrutiny before being permitted to be used to support decisions or actions under the auspices of the DPD.</p>			<a href="#">6</a>	

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						support future actions after formalization of the DPD should be given public community scrutiny before being permitted to be used to support decisions or actions under the auspices of the DPD.					
Proposals Map - Proposed Changes Submission Version		757514	RAGED Residents RAGED RAGED	No	No	<p>The Proposals Map is based on documents including the Greenwich Open Space Study, which was published in 2008.</p> <p>The reasoning shown here for the Open Space Study being unsound should be applied to other supporting documents.</p> <p>That document is over 5 years old and was out of date when it was published.</p> <p>It is therefore not sound to Base the DPD supporting documentation on old documents.</p> <p>It has been proved and agreed by the Parks department that the Open Spaces designations on Map 5.5 supporting the Greenwich Open Space Study is incorrect.</p> <p>The supporting documents have deficiencies which spawn lack of effectiveness of Open Space Designations and therefore the DPD which it feeds.</p> <p>As decisions and actions are likely to be taken as the DPD is formalized, with these out of date evidences supporting it, It should be required that any part of the DPD that can be shown to be undermined by these deficient documents should be required to have updates made before any action or other change takes place under the guidance of the DPD.</p> <p>Further, these supporting documents contain Policy and Recommendations which are similarly out of date. These documents were also not tested in the community before publication. So adoption of these documents as support to the DPD is likewise unsafe and ineffective.</p> <p>All supporting documents used as evidence to support future actions after formalization of the DPD should be given public community scrutiny before</p>	<p>The following requirements should be written into the DPD.</p> <p>Greenwich Open Space Study, and other supporting documents, should be given public community scrutiny before being permitted to be used to support decisions or actions under the auspices of the DPD.</p> <p>All supporting documents used as evidence to support future actions after formalization of the DPD should be given public community scrutiny before being permitted to be used to support decisions or actions under the auspices of the DPD.</p>				<a href="#">7</a>



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						being permitted to be used to support decisions or actions under the auspices of the DPD.					
Proposals Map - Proposed Changes Submission Version		148451	Tilfen	No	No	We support the Proposed Change to the Proposals Map to clarify the boundaries of the Thamesmead Strategic Development Location. We note that the Thamesmead and Abbeywood SPD is referred to in, inter alia, in the explanatory text (e.g. paragraph 3.3.44). However, we would stress that the SPD predates the Core Strategy and therefore whilst it will be a material consideration in the determination of planning applications it will not comprise part of the local development framework. Instead, we would expect the Site Allocations DPD to address site specific matters.		382433	Mr Craig Blatchford	Blue Sky Planning	<a href="#">9</a>
Proposals Map - Proposed Changes Submission Version		148451	Tilfen	No	No	<p>Gallions Reach</p> <p>Tilfen land supports the proposed changes to the designation of Gallions Reach from a Proposed Local Centre to a Local Centre. Notwithstanding, we note that the proposed changes to the Proposals Map identifies the existing frontages only as "Local Centre Frontages". For clarity, we would recommend that Gallions Reach as a whole, including that part of the site previously granted permission for a foodstore and drive thru restaurant, is clearly identified as the Local Centre. For convenience, we attach a plan indicating the extent of Gallions Reach.</p> <p>Tripcock Point/Tamesis</p> <p>The Proposals Map identifies Tripcock Point as Proposal Site mu40 and identifies the site for "residential led mixed use development with ancillary local retailing and services, community and commercial uses". The site and potential development proposals are undergoing detailed review by Tilfen Land and its development team. The exact form and content of the scheme are likely to be updated. Initial conclusions indicate a potential shift to lower density, family housing across parts of the site and a clear viability shortfall in part arising from the inclusion of commercial uses (e.g. B1, B2 and B8 uses, hotel and other commercial uses). Therefore, at this stage and in the context of the emerging Site Specific Allocations SPD, we confirm</p>		382433	Mr Craig Blatchford	Blue Sky Planning	<a href="#">10</a>

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						<p>that Tilfen Land foresees the need to review and update the proposed development in partnership with the Council over early stages of the Core Strategy reflecting changing commercial and other factors.</p> <p>Post the November 2010 Consultation version of the Core Strategy, we met with Lauren Gray/Steve Tyler of the Council to discuss the representations. Specifically, we discussed further our comments that "the exact boundaries of the site (particularly the western boundary) may need to be reconsidered having regard to, inter alia, the waste management plan for LF3, etc. Therefore, we would suggest that the Proposals Map and associated site allocation should reflect this." A Proposed Site Boundary Plan showing the existing and the proposed re-alignment was submitted in June 2011. A further copy is attached for your convenience. You will note that the proposed boundary would require a minor re-alignment of the Metropolitan Open Land (MOL) boundary with some additional land being included within MOL and some excluded.</p> <p>We would reiterate our view that the proposed re-alignment should be reflected in Proposed Changes to the Proposals Map.</p> <p>Canal System, Area 6</p> <p>Thamesmere Extension lake in Area 4 via Twin Tumps; providing a setting for a footpath and cycle way link and providing ecological areas.</p> <p>In relation to the November 2010 Consultation Version we commented, inter alia, that subject to detailed investigations, there is a significant possibility that there will not be a drainage need to link the two canal systems as proposed.</p> <p>We confirm that the detailed drainage investigations have been undertaken by URS Scott Wilson and these do conclude that there is no drainage need to link the two canal systems. . Given the additional infrastructure costs arising and the implications a canal link could have in terms of the planning and delivery of Thamesis/Tripcock Point (including in</p>					

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						<p>terms of viability and programme), we would reiterate our representations that the Proposals Map be amended to allow greater flexibility in relation to o19.</p> <p>NC21</p> <p>NC21 refers to an area of 2.5 ha described as Thamesmead Historic Area and Wetlands. It is identified on the Proposals Map as a Site of Importance for Nature Conservation-Site of Borough Importance, Grade 1. In our opinion, the area as a whole does not display characteristics which would warrant such a designation. Therefore, we reserve the right at the Site Specific Allocations stage to present detailed information so as to agree a more appropriate site boundary. At this stage, we reserve our position regarding the implications for the MOL boundary.</p>					
Proposals Map - Proposed Changes Submission Version		148451	Tilfen	No	No	Tilfen land supports the proposed changes to the designation of Gallions Reach from a Proposed Local Centre to a Local Centre. Notwithstanding, we note that the proposed changes to the Proposals Map identifies the existing frontages only as "Local Centre Frontages". For clarity, we would recommend that Gallions Reach as a whole, including that part of the site previously granted permission for a foodstore and drive thru restaurant, is clearly identified as the Local Centre. For convenience, we attach a plan indicating the extent of Gallions Reach.		382433	Mr Craig Blatchford	Blue Sky Planning	<a href="#">11</a>
Proposals Map - Proposed Changes Submission Version		148451	Tilfen	No	No	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 (see also Policy DH2). Notwithstanding, for clarity we would recommend that the Figure is amended to explicitly include the area of ThamesisiTripcock Point comprising the river frontage.		382433	Mr Craig Blatchford	Blue Sky Planning	<a href="#">12</a>
Proposals Map - Proposed Changes Submission Version		148451	Tilfen	No	No	The Figure on Page 119 identifies "open space deficiency areas" in relation to Policy OS (c). We note that Thamesis/Tripcock Point falls within a District Park deficiency area and the northern part of Tripcock Point (fronting the river) is a Local Park deficiency area. We would ask that the Council		382433	Mr Craig Blatchford	Blue Sky Planning	<a href="#">13</a>

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						confirm that these designations have taken into account Gallions Reach Urban Park (circa 9.5 ha) and if not, the areas designations be reviewed. Notwithstanding, a "local park deficiency area" appears to cover that part of ThamesisiTripcock Point which is subject to the extant outline planning permission for residential development. We request the Council confirms that the designation does not require this area to be set aside for a local park.					
Map 7 - Charlton Riverside Strategic Industrial Location	3.7	762062	Mr Nicholas Elson	No	No	<p>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.</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> <p>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>				<a href="#">14</a>	
Map 11 - Eltham Town Centre Retail Frontage	3.11	756674		Yes	No	BENGROVE INVESTMENTS LTD SUPPORT THE REMOVAL OF GROVE MARKET PLACE FROM THE FRINGE RETAIL FRONTAGE OF ELTHAM TOWN CENTRE (AS SHOWN ON PROPOSAL MAP 11), HOWEVER, CONCERNS	THE FRINGE RETAIL FRONTAGE NEEDS TO BE AMENDED. THE PROPOSED BOUNDARY ACCOMPANIES THIS REPRESENTATION.	756671	Mrs Sarah Moorhouse	Associate Director Nathaniel Lichfield &	<a href="#">15</a>

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						<p>ARE RAISED REGARDING THE REVISED FRONTAGE.</p> <p>THERE ARE NO EXISTING RETAIL UNITS AT THE FORMER ENTRANCE TO GROVE MARKET PLACE AND THERE IS THEREFORE NO REASON TO JUSTIFY THE PROPOSED NEW FRINGE FRONTAGE BOUNDARY. THE FRINGE RETAIL FRONTAGE TO THE WEST SIDE OF COURT YARD SHOULD STOP TO THE NORTH OF GROVE MARKET PLACE (AT ROBINSON JACKSON ESTATE AGENTS) WHERE THE EXISTING RETAIL FRONTAGE ENDS.</p>				Partners	