

Greener Greenwich SPD Statement of Consultation – August 2014

Introduction

- 1.1 This statement provides an overview of the consultation undertaken during the production of Greener Greenwich, which will be adopted by Royal Greenwich as a Supplementary Planning Document.
- 1.2 Consultation was carried out for a six week period, in line with the measures set out in the Borough's Statement of Community Involvement. It has played an important role in informing the content of the SPD.
- 1.3 15 formal responses were received in total to the consultation. These were received from a range of individuals, local amenity groups, organisations and businesses.

Details of the Consultation

2 Summary

- 2.1 The formal consultation on Greener Greenwich took place between Tuesday 4th March and Tuesday 15 April 2014. The following took place as part of this consultation:
 - Approximately 870 individuals, local groups, businesses, landowners and organisations were notified by either email or letter, including specific and general consultation bodies. 253 letters and 617 emails were sent.
 - Consultation Draft Greener Greenwich documents were prepared for reference. These were sent out to all libraries in the Borough together with a copy of the Sustainability Screening Assessment and Statutory Notice.
 - Both the Royal Greenwich website and the Objective consultation portal were updated to advise people of the consultation and the document was made available to view here.
 - Advertisement placed in Greenwich Time on Tuesday 4th March, indicating the start and end date of the consultation and when and where the documents could be inspected.

Responses and Key Changes Proposed

- 2.2 Twelve organisations and two individuals responded to the consultation. In overall terms there was considerable support for the proposals. Many of the consultation responses were focussed on improving the effectiveness of the SPD. The table in Appendix A shows how each of these comments have been taken into account to strengthen the SPD in a number of areas.
- 2.3 Key changes to the document following consultation are:
 - In the Materials and Energy chapters there are references to the importance of preserving the integrity of Conservation Areas and Listed Buildings.
 - The Biodiversity chapter now includes a section on protecting trees. Another section incorporates guidance on protecting water courses from pollution by sewage.
 - The use of artificial nesting and roosting sites and bat boxes are encouraged.
 - It is stated that an ecological appraisal should be carried out for all development sites.
 - In the Energy chapter the importance of Green Infrastructure is included in the section on Adapting to Climate Change.
 - Text has been amended in the Pollution chapter to more closely follow Environment Agency guidance on contaminated land.
 - A new section on local food growing has been added to the Biodiversity chapter.
- 2.4 A full list of the responses received and the Council's subsequent response and changes made to the SPD are detailed below in Appendix A.

Appendix I

3 Full Responses

3.1 The following pages provide a list of formal comments received on the Greener Greenwich SPD during the consultation. The Council's subsequent responses are also listed.

Database No.	Ref	Full Name	Company / Organisation	Chapter	Consultee comment	Royal Borough response	Modification to document
167255	26	Mr Patrick Blake	Highways Agency		The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. We have reviewed the documents and do not have any comments at this time.	Noted	No changes to document.
830261	5	Miss Claire Pritchard	GCD A	Biodiversity	Can there be a specific reference to food growing. Accommodating and considering outdoor growing with raised beds and access to the rainwater.	Agreed. Local Plan policy CH2 and London Plan policy 7.22 support this and therefore a section should be added.	A section on local food growing has been added to the document under 5.2.
831496	9	Mr John Ettridge	Greenwich Community College	Biodiversity	Living roofs is something the college would activity investigate when considering a new development.	Noted	No change to document.
832862	17	Katharine Fletcher	English Heritage - London Region	Biodiversity	Measures to enhance Biodiversity are often compatible with conserving and enhancing the historic environment. However, this is not always the case, and proposals should be assessed at an early stage for any adverse impacts. For instance, proposals for living roofs may not be supported, or appropriate, in the case of historic structures, depending on their characteristics and significance; similarly, proposals involving excavation for water features may require assessment of archaeological potential.	Agreed. Proposals involving heritage assets will be referred to Conservation Officers at an early stage.	No change to document.
474192	24	Environment Agency	Environment Agency	Biodiversity	We are very supportive of the level of detail in the guidance for protecting biodiversity. However, one area where there could be slightly more guidance is for developments in the vicinity of the waterside. Land adjacent to watercourses is particularly valuable for wildlife and it is essential this is protected. Article 10 of the Habitats Directive also stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity. Construction Management Plans/Method Statements and Landscape Management Plans should incorporate principles of guidance documents such as 'Estuary Edges' and the 'Check-Clean Dry' campaign. The London Rivers Action Plan is a useful tool, and case studies are available on the RESTORE website.	Noted. The chapter on biodiversity will be strengthened to reflect the Environment Agency's comments.	The Biodiversity chapter has been strengthened by incorporating the importance of protecting watercourses and the river corridor and mitigation of water pollution. Reference to the Estuary Edges guidance has been provided.
758828	27	Angela Atkinson	Marine Management Organisation	Biodiversity	As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. Until such time as a marine plan is in place for south east inshore plan area we advise local councils to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. The MMO is a Statutory Consultee to the Planning Inspectorate for	Noted. A reference will be included in the SPD.	In Biodiversity chapter Paragraph 5.1.11 insert: "A marine licence may be needed for activities involving a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Any works may also require consideration under The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended). Early consultation with the Marine Management Organisation is advised. More information is available at

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					relevant Planning Act developments (Nationally Significant Infrastructure Projects). A marine licence may be needed for activities involving a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Any works may also require consideration under The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) and early consultation with the MMO is advised. We would suggest that reference to this be made within planning documents to ensure that necessary regulatory requirements are covered. We would encourage applicants to engage early with the MMO alongside any application for planning consent to ensure that the consenting process is as efficient as possible.		www.marinemanagement.org.uk ."
147468	30	Mr David Hammond	Natural England, London Region	Biodiversity	This SPD should encourage the taking of opportunities to incorporate features which are beneficial to wildlife into final proposals for development. The Council may wish to consider whether it is appropriate to provide guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD.	Noted.	Include in the Biodiversity Chapter reference to the Bat Conservation Trust's bat box information pack, which has been provided as guidance on the type and number of boxes that development proposals should consider and how and where to install them.
147468	30	Mr David Hammond	Natural England, London Region	Biodiversity	Provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment through landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments, which provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts. In addition, the impact of lighting on landscape and biodiversity is a topic that should be covered by any design related SPD.	Noted.	Include in the Biodiversity Chapter the requirement for development proposals to consider the impact of lighting on landscape and biodiversity.
147835	33	Linda Hodgson	Heathway Conservation Area Residents Association	Biodiversity	More striking is the total absence of discussion in the SPD of the vital importance of trees for the environment of the borough, even in Appendix A above. This absence should be addressed by a thorough analysis of the role played by trees towards the aim of the SPD and the steps proposed to achieve this.	RBG requires development proposals to undertake the identification and consideration of all existing trees on site at an early stage to ensure the successful retention, protection and survival of trees as stated within the Core Strategy Local Plan. The Biodiversity chapter has been strengthened to reflect this requirement and the importance of protecting trees.	Strengthen the Biodiversity chapter to reflect comments and include the role of trees in climate change adaptation.
267373	39	Rachel Ness	London City Airport Limited	Biodiversity	LCY is a statutory consultee on all planning applications that might influence any of its safeguarded surfaces, its safeguarding environment or risks from increased bird strike as a result of any scheme or change in land use encouraging increased numbers of birds within the vicinity (13km) of the Airport. Therefore we advise developers and applicants to consider carefully if their proposal has any likelihood of improving land for birds or of increasing flying movements by birds in the vicinity of the Airport. In particular schemes such	Noted. It is not considered appropriate to include these changes in SPD which is designed to encourage biodiversity and sustainable development. However, planning constraints are set out in the Royal Greenwich Local Plan policy IM(d) London City Airport.	No change to document.

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					as green/brown roofs which are intended to increase the bird population in that area would not be favourable, predominantly on larger sites and those closer to the south of the borough, as these would significantly increase the risk of bird strikes at LCY. Therefore, we encourage the continued involvement of LCY in the planning process when it comes to bird management and are always happy to give advice on this matter to both developers and the council's planning team.		
502194	43	Waite		Biodiversity	Having experienced problems in our street when a developer of a nearby site ignored planning conditions relating to biodiversity we firmly believe that there should be a very clear statement about who monitors this in Greenwich and strong structures to enforce monitoring and take action as appropriate. Paras 5.1.1 and 5.1.2 are not clear and seem contradictory. In Para 5.1.3, developers should be "obliged" rather than merely "recommended" to allow appropriate lead in times for surveys. Paras 5.1.4 and 5.1.5 need clarification, as it looks as if payment of a fee to access GiGL may be necessary. Para 5.1.6 should include a reference to the Environment Agency's control, eradication and disposal advice. Para 5.1.14 does not take adequate account of the difference between small and large sites. Para 5.1.15 should if possible use the word 'stipulates' instead of 'expects.' Para 5.1.23 should include the requirement for major housing developments to include a wildlife garden. It is not clear in para 5.1.24 whether all developments or only major developments need a Construction Management Plan. Para 5.1.25: Who exactly will monitor "sensitive receptors" throughout construction? Para 5.1.26: species do not always want to be relocated and the community from which they have been moved inevitably faces a loss in bio-diversity. There are no details as to how monitoring will take place.	Noted. Ecological considerations should be taken account of in all development and clarity should be given as to what different types of development need to provide in regards to surveys and assessments.	The Biodiversity chapter has been updated to state that an ecological appraisal should be carried out for all development sites. A link to Defra's guidance on dealing with invasive plants and how to remove them has been provided. Development proposals are required to undertake the identification and consideration of all existing trees on site at an early stage to ensure the successful retention, protection and survival of trees. The Biodiversity chapter has been strengthened to reflect this requirement and the importance of protecting wildlife and trees. The SPD has been updated to reflect the other comments where appropriate.
833001	51	Anne Waite	Charlton Central Residents Association	Biodiversity	Who monitors Bio-Diversity in RBG? Paras 5.1.1 and 5.1.2 give cause for concern. Although an ecological survey is required for all development sites, an Ecological statement is only required for "major developments". No account is being taken of the fact that a small site (under 10 homes) may be part of a larger eco-system; and development of the former without the need to look at the wider picture and submit an Ecological statement may be harmful. Under current wording there is also scope for a small developer to cut corners and ignore No-diversity requirement and laws. Para 5.1.3 Developers should be obliged rather than merely recommended to allow appropriate lead in times for surveys. Paras 5.1.4 and 5.1.5. The mention of "subscription" is unclear. Are interested parties required to pay a fee to access GiGL? Or do they simply create an account and log in via a password? Para 5.1.6 Japanese knotweed is such a problem that it would be desirable to include here a reference to the Environment Agency's control, eradication and disposal advice on its website. Para 5.1.14 The measures outlined here may work on large sites but there must be a concern that vegetation on small sites will not be retained as it will	Noted. Ecological considerations should be taken account of in all development and clarity should be given as to what different types of development need to provide in regards to surveys and assessments.	The Biodiversity chapter has been updated to state that an ecological appraisal should be carried out for all development sites. A link to Defra's guidance on dealing with invasive plants and how to remove them has been provided. Development proposals are required to undertake the identification and consideration of all existing trees on site at an early stage to ensure the successful retention, protection and survival of trees. The Biodiversity chapter has been strengthened to reflect this requirement and the importance of protecting wildlife and trees. The SPD has been updated to reflect the other comments where appropriate.

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					"interfere" with the design and construction. Para 5.1.15 Developers are adept at side-stepping "requirements" (often viewed as "recommendations"), so it would be desirable to include the word "stipulates" instead of "expects". Para 5.1.23 It should be obligatory for major housing developments to include a wildlife garden. These can often be small scale and there is no reason not to include them. Para 5.1.24. It is not clear whether all developments or only major developments need a Construction Management Plan. Para 5.1.25 Who exactly will monitor "sensitive receptors" throughout construction? Only "large and complex" developments are required to have a qualified ecologist in an advisory and support role and there is scope for abuse of the whole process in a small scale development. Para 5.1.26 Translocation of species. Species do not always want to be relocated and the community from which they have been moved inevitably faces a loss in bio-diversity. There are no details as to how monitoring will take place.		
831496	7	Mr John Ettridge	Greenwich Community College	Checklist	Greenwich College supports that a development design should make efficient use of energy, renewable energy technology and water efficiency in its design. It also welcomes the use of local suppliers. The college have investigated Biomass and Biofuel and have concerns because of the location of the college to its residence as to fuel deliveries and transfer arrangements and this would need to be carefully considered in any future developments that the college wished to consider. The college would support facilities for bicycles and changing facilities.	Noted.	No change to document.
832862	15	Katharine Fletcher	English Heritage - London Region	Checklist	In the case of developments where heritage assets are affected, directly by changes to their fabric, or indirectly through changes to their setting, it is critical that schemes are appropriately tailored to avoid harm. Often heritage assets can accommodate change, but early assessment of the asset's significance will ensure that the best solution is found. For this reason, we regard it as essential that the checklist at the front of this document includes references to early assessment in relation to any heritage assets affected, or potentially affected.	Agreed. It is also important also to note that heritage assets are exempt from Part L of the Building Regulations through legislation.	The following statement: "changes to the fabric of heritage assets or their setting should only be considered following assessment of the significance of the heritage asset" has been added as a footnote to the checklist along with a link to the following English Heritage webpage where further guidance is available: http://www.climatechangeandyourhome.org.uk/live/
265434	35	Carmelle Bell	Savills for Thames Water Plc	Checklist	Thames Water recommends that all new dwellings should meet the water usage targets set out in the Code for Sustainable Homes code 3 rating as a minimum.	Agree. All new dwellings should meet the minimum water consumption targets set for Code for Sustainable Homes Levels 3 and 4 of 105 litres/head/day.	The following text has been added to Chapter 4: "New residential developments are expected to have a predicted water consumption that meets the specifications required to achieve Code For Sustainable Homes Level 4 of less than 105 litres/head/day using the Government's national calculation methodology for assessing water efficiency in new dwellings outlined in the <i>Water Efficiency Calculator for New Dwellings</i> ."
324126	1	Mr Keith Billingham	Progress Residents Association	Energy	Whilst paragraph 3.1.15 deals with listed buildings, we do not see any reference anywhere in this document to conservation areas such as the Progress Estate Conservation Area. The area's Article 4 Direction provides the Royal Borough with additional powers to preserve its character. Because we are always concerned with what might be described as 'regulatory creep,' we ask that the following is added to the Greener Greenwich Supplementary Planning Document (Consultation	Noted. Article 4 Direction guidance notes and character appraisals and management strategies (CAMS) are supplementary planning documents. One SPD does not take precedence over the other, as is the case with development plan documents (where a policy conflict arises, then the more	This section within the Energy chapter has been amended to include more information and guidance, including that on the Royal Borough's conservation area appraisals, Article 4 Directions, and associated guidance.

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					Draft v2) without any provisos: 'In the event of their [sic] being a conflict between this document and other adopted documents that seek to preserve the character of the Progress Estate Conservation Area, the latter shall always take precedence over the former.'	recently adopted document takes precedence). In addition, listed buildings and buildings in conservation areas are exempt by legislation from Part L of the building regulations, if works would unacceptably alter the character of the building. Further to this, six conservation areas, including the Progress Estate, have Article 4 Directions in place, which remove most householder permitted development rights. Therefore, it would not be appropriate to include the requested statement in the document.	
830261	3	Miss Claire Pritchard	GCDA	Energy	Where possible can developers be referred to community energy providers? If and when they exist to be a provider. For example South East Solar.	The Royal Borough is committed to supporting local communities and businesses. However in order to promote equality of opportunity the Royal Borough is unable to endorse commercial companies, outside a procurement contract, including those that provide community energy. . Paragraph 6.1.5 of the Greener Greenwich SPD states that developers are encouraged to always seek local suppliers and sources in the first instance.	No change to document.
830261	4	Miss Claire Pritchard	GCDA	Energy	Can there be wider reference to active transport and encouraging walking and cycling. Not just good storage but how streets within development encourage outdoor play, children's cycling, walking and how these routes effectively connect to adjoining roads to ensure safe walking & cycling.	Agreed. Core Strategy policy IM4 encourages sustainable modes of travel, policy IM(b) addresses walking and cycling, and IM(c) covers parking.	No change to document.
832862	16	Katharine Fletcher	English Heritage - London Region	Energy	Alterations to provide insulation in historic buildings, or restrict ventilation can result in, for instance, condensation and building decay, or visually intrusive alterations. However, well considered adaptation can avoid these problems, and we strongly advise that the SPD identifies the need for care to be exercised in relation to traditional buildings, and expert advice sought at the beginning of the design process. The advice at para 3.1.15 is very helpful, but we would recommend that it should include this important message.	Agreed.	Paragraph 3.1.15 will be amended to include the following sentence: "Poorly designed insulation can result in problems of condensation or damage to building fabric. Well considered adaptation can avoid this."
474192	22	Charles Muriithi	Environment Agency	Energy	The Council should require development proposals to take account of the expected changes in local climate conditions throughout development's lifetime. Information must be submitted with an application. In addition, New development should seek to ensure the quantity of open space is sufficient to meet local need and designed to anticipate future climate change.	Agreed.	The section on adaptation to climate change will be strengthened to reflect comments.
265434	36	Carmelle Bell	Savills for Thames Water Plc	Energy	Climate change is a vitally important issue to the water industry. Not only is climate change expected to have an impact on the availability of raw water for treatment but also	Noted.	No change to document.

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					the demand from customers for potable (drinking) water. Therefore, Thames Water supports the inclusion within the SPD of policies in respect of water conservation and the efficient use of water.		
502194	41	Waite		Energy	The differences between major developments (over 10 homes) and smaller scale developments are not being addressed adequately. It is difficult to see how Paras 3.2.1, 3.2.2 and 3.2.4 relating to C(C)HP networks could be achieved by a small developer of, for example, three or four homes more than 1k away from one of these networks. As a family, we are also concerned about Para 34.2. The requirement to offset carbon emissions where certain on-site measures are not feasible is likely to impact adversely on small-scale developments rather than large ones. By its very nature, carbon offsetting benefits sites other than the development site, so the people living at/near the development site will be the losers. This is unfair. Para 3.5.3 mentions certain climate scenarios which do not mirror what has happened most recently. Is RBG using the most up-to-date information on climate change?	Noted. The energy considerations of the SPD are applicable to major development and not all development. Therefore, non-major developments would not be expected to meet the requirements for CHP. Major development proposals are required to meet national and local carbon reduction requirements and targets. However, where this is not feasible, any shortfall would be required to be met through a local carbon off-set fund. The adaptation to climate change paragraph will be reviewed following the recent publication of the Mayor's sustainable design and construction SPG and text strengthened where possible to reflect more recent weather conditions.	The section on adapting to climate change has been strengthened to reflect the GLA's recently published Design and Construction SPG (April 2014), taking into account more recent information on climate change.
833001	49	Anne Waite	Charlton Central Residents Association	Energy	Most of the provisions are highly-commendable but CCRA is concerned that insufficient attention is being given to the differences between major developments (over 10 homes) and smaller scale developments. It is difficult to see how Paras 12.1, 3.2.2 and 3.2.4 relating to C(C)HP networks could be achieved by a small developer of, for example, three or four homes more than 1k away from one of these networks. Para 3.4.2 is also of concern as the requirement to offset carbon emissions where certain on-site measures are not feasible has the potential to affect small-scale developments rather than large. If carbon offsetting is going to benefit sites elsewhere in the borough, this means that the original host community (often already built up) will get all the pain and no gain. Para 3.5.3 speaks of hot, dry summers and mild wet winters, but in recent years some very wet summers have occurred. Is this study based on the most up-to-date information on climate change? There are models which suggest very different scenarios.	Noted. The energy considerations of the SPD are applicable to major development and not all development. Therefore, non-major developments would not be expected to meet the requirements for CHP. Major development proposals are required to meet national and local carbon reduction requirements and targets. However, where this is not feasible, any shortfall would be required to be met through a local carbon off-set fund. Clarity should be provided as to the different requirements for major and minor development, where appropriate, within the SPD. The adaptation to climate change paragraph will be reviewed following the recent publication of the Mayor's sustainable design and construction SPG and text strengthened where possible to reflect more recent weather conditions.	The section on adapting to climate change will be strengthened to reflect the GLA's recently published Design and Construction SPG (April 2014), taking into account more recent information on climate change.
474192	21	Charles Muriithi	Environment Agency	Flood Risk	The Environment Agency Thames Estuary 2100 (TE2100) Plan was approved by DEFRA in November 2012. The Thames estuary is divided into 23 policy units to help us look at tidal flood risk issues locally. There are twelve TE2100 Plan policy units in London and the Royal Greenwich falls under the Greenwich policy unit. The selected policy for Greenwich is policy P5 - 'take further action to reduce flood risk beyond that	Noted. The Royal Borough as the Lead Local Flood Authority has incorporated the TE2100 plan in its draft Local Flood Risk Management Strategy (LFRMS) and the TE2100 outcomes for Action Zones 3 and 4 within the TE2100 plan will be incorporated into both the supporting	The chapter on flood risk has been amended to encourage developers to consult key documents on flood risk which include reference to TE21.

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					<p><i>required to keep pace with climate change.</i>' The TE2100 Plan requires a wide range of works to be implemented on the estuary. All policy units will require land for inspection, maintenance and repair of existing defences, and additional land where defences are to be raised. Land is also required for habitat creation. There are extensive areas of redevelopment planned in this Policy Unit, which provide opportunity to improve flood risk management. Third party riverside developments should be compatible with the TE2100 Plan, which sets out specific requirement that should be taken into account in the design of flood risk management interventions in order to achieve local planning objectives for this Policy Unit. We are currently developing a Riverside Strategy for the tidal Thames appraising the environmental constraints and opportunities for each policy unit. This may provide opportunities to improve the ecological capacity and appearance of this frontage.</p>	<p>Action Plan of the LFRMS as well as the Royal Boroughs Local Flood Risk Management Plan (FRMP). These will both link directly to the national FRMP, the Thames and North Kent CMFP as well as the Thames RBMP and any outcomes of both the Thames and Southern RFCC's. The Royal Borough is also preparing flood risk guidance for developers. This document will outline the requirements of how FRAs should be carried out, how the Royal Borough will expect to receive and approve applications as the SuDS approval body, and also sets out how SuDS should be delivered within Royal Greenwich as a whole. Within this document there is also a chapter on how evacuation plans should be submitted with planning applications. This document sets out how Ordinary watercourses will be managed within the Royal borough and their significance in maintaining water quality as well as habitat. All these documents will be subject to consultation with the Environment Agency, however we note all comments and where practical we will incorporate them into the LFRMS, LFMP and the developer's guidance document.</p>	
474192	21	Charles Muriithi	Environment Agency	Flood Risk	<p>Where a Flood Risk Assessment is required, all sources of flooding including groundwater, surface water and sewer flooding, and historic flood mapping are required to be considered within the FRA to determine the risk of flooding from sources other than fluvial and/or tidal, and for appropriate mitigation measures to be proposed as necessary. The Flood Risk Assessment will be required to consider how the development will remain safe during a flood and how development would recover from a flood. Developers should be required to make occupants aware of the possible impact of flooding on the property, how to receive flood warnings and what action should be taken should a warning be received or a flood occur.</p>	Noted.	No change to document.
474192	21	Charles Muriithi	Environment Agency	Flood Risk	<p>Surface water flooding does not appear to be problematic in the majority of Royal Greenwich. However, surface water modelling highlight areas of Royal Greenwich that are potentially at risk from surface water flooding. These include areas of Eltham, Kidbrooke, Greenwich Peninsula, New Charlton, Royal Arsenal East, Plumstead and Abbey Wood. We welcome the prominent coverage of SUDs in the SPD. A Surface Water Management Plan is being prepared to address this through the Drain London project and developments</p>	Noted.	No change to document.

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					should demonstrate how the principles of this have been applied. The findings of this plan are expected to identify areas where surface water flooding is an issue and will provide further evidence for areas in need of SUDS, and specific criteria has been set, which development must have regard to. In addition, there are further requirements for waterfront and riverside development, and maintenance of flood defences.		
265434	38	Carmelle Bell	Savills for Thames Water Plc	Flood Risk	Thames Water supports the approach in the London Plan Section 5.13 (Sustainable Drainage) and the Mayor's sequential approach to surface water run-off and its management as close to source as possible. It is important to reduce the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage thus reducing the risk of sewer flooding.	Noted	No change to document.
502194	47	Waite		Flood Risk	Para 9.0.1 Our Thames defences are well-publicised but there are other types of flood risk (surface water; ground water) as shown in the Environment Agency's maps. Every planning application made in Greenwich should consider the full range of flood risk, rather than just the tidal and fluvial flooding areas identified in the SFRA. Para 9.0.2 The SFRA is dated 2011 so its findings and its recommendations do not take account of the prevailing weather conditions from the winter of 2013/2014. It has been well-publicised that areas well away from the Thames flooded. The SFA should be updated to take account of surface water flooding outside the already identified flood risk areas. Para 9.1.6 As well as determining responsibility for maintenance of SUDS, there should be a monitoring mechanism established. If not, SUDS upkeep may fail in to abeyance.	The SFRA includes maps which show areas of surface water flooding. It is recognised that the SFRA will need to be reviewed in the future.	No change to document.
833001	55	Anne Waite	Charlton Central Residents Association	Flood Risk	Para 9.0.1 Greenwich has robust flood defences along the Thames but Environment Agency maps show other parts of the borough as being of high risk of surface water flooding. It is vital that all planning applications borough-wide consider the full range of flood risk. It is not sufficient to focus solely on the tidal and fluvial flooding areas identified in the SFRA. Para 9.0.2 It is noted that the SFRA is dated 2011. Therefore its findings and its recommendations are not up to date, given the weather conditions experienced in the winter of 2013/2014 where areas well away from the Thames flooded. There should be an update to take account of surface water flooding outside the already identified flood risk areas. Para 9.1.6 It is vital that responsibility for maintenance of SUDS is not only determined but that a monitoring mechanism is established. Otherwise there is scope for lapses in upkeep of SUDS.	The SFRA includes maps which show areas of surface water flooding. It is recognised that the SFRA will need to be reviewed in the future.	No change to document.
827404	2	Ms Deborah O'Boyle		Introduction	I think that an additional clause should be added, regarding adaptability of new buildings, to allow for change of use. This comment springs from news that the Greenwich Sainsbury supermarket, hitherto lauded as sustainable, has proved the opposite after just 15 years' existence due to the inability to enlarge or, more importantly, adapt it for different use.	Agreed. However, it is important to be clear that change of use would only be acceptable where permitted by legislation or development plan policy.	The importance of the adaptive reuse of existing buildings and the need for developers to consider the reuse of buildings, where feasible, and where the original use is no longer required or appropriate, subject to planning policy constraints, will be added to the Materials chapter.
831496	6	Mr John	Greenwich	Introduction	Greenwich Community College welcomes the aspiration to	Noted.	No change to document.

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		Ettridge	Community College		create buildings and space that meets the needs of the users and more importantly the wider community and that the Council Officers would support a development at the earliest stage of designing buildings. The college also recognises the importance of an Environmental Assessment Tool such as BREEAM to achieve a mid-point score.		
832862	14	Katharine Fletcher	English Heritage - London Region	Introduction	We note that the SPD addresses both new development, and the refurbishment of existing buildings. It also provides advice to homeowners seeking to improve the environmental performance of their property. The guidance is therefore pertinent to, for instance, proposals for adaptation of listed buildings, or developments that may result in a visual impact on heritage assets. We welcome the references in the document to heritage assets; however, we would encourage further consideration be given in the SPD to how heritage assets may be affected by the types of developments likely to come forward.	Noted. Conservation area appraisals and management strategies (CAMS) are supplementary planning documents and 14 of the 20 conservation areas already have adopted CAMS in place. Six conservation areas have Article 4 Directions in place and guidance for these is currently being reviewed. These SPDs provide guidance on development in Royal Greenwich conservation areas.	Amendments to the Materials and Energy chapters make reference to conservation area appraisals and Article 4 Directions and guidance, and that these provide detailed guidance on how refurbishment, repair and upgrading of the properties can be achieved whilst minimising loss of character.
147468	28	Mr David Hammond	Natural England, London Region	Introduction	This type of SPD should, where possible, provide a clear focus in relation to Green Infrastructure (GI) provision. Where possible such provision should be incorporated into new development. Natural England has developed a GI signposting document, which may be of assistance; it includes detail in relation to GI provision. We also suggest you may wish to draw upon The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity."	Noted. The SPD highlights the importance of green infrastructure in development proposals, but specific reference can be made to signposting documents to strengthen the document.	The section on adaptation to climate change has been strengthened to reflect the importance of green infrastructure in adapting to climate change. In addition, the need for development proposals to incorporate green infrastructure has been strengthened within the biodiversity chapter.
147835	31	Linda Hodgson	Heathway Conservation Area Residents Association	Introduction	Our review of the Greener Greenwich SPD and Main Modifications to the Core Strategy has considered the two documents both for their potential impact on the area of immediate concern to our association (Heathway and its environment within the Blackheath Conservation Area), and for their wider impact on Royal Greenwich, of which we are residents. The SPD is a formidable document and it is to be hoped that developers will be able to understand and apply its requirements.	Noted.	No change to document.
265434	34	Carmelle Bell	Savills for Thames Water Plc	Introduction	Thames Water is the statutory sewerage and water undertaker for Borough and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012.	Noted.	No change to document.
502194	40	Waite		Introduction	Para 1.0.7 and Para 1.0.13. In the past, developers have been able to obtain "sign-off" of a scheme by using private Building Control companies, and if this continues, our concern is that part of the system will be outside the control of the LPA and open to abuse. Is it the plan that all these assessments will be submitted to, monitored, assessed and signed off by RBG's Planning Department? If Post-Assessment is now to be brought within the control of the LPA, what are the implications for the staffing budget? We are also concerned that in recommending that developers aim to achieve a mid-point score of the relevant level to be achieved (BREEAM or Code for Sustainable	The Royal Borough adheres to the legal framework in the UK to assess and determine planning applications. Environmental assessments, such as BREEAM and Code for Sustainable Homes, are required to be independently assessed by certified assessors. As part of the Royal Borough's planning application process, major developments are required to submit to the local planning authority	No change to document.

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					Homes) in both the Pre-Assessment and Design stage, the slippage mentioned in Para 1.0.14 to allow for construction glitches will result in final scores being at the bottom end of the scale. The base line should be set higher than mid-point to ensure that desirable levels are achieved.	pre design and post construction assessments and a post construction certificate prior to occupation as evidence that the expected standards have been met. The standards set are in line with the expectation of the Mayor's London Plan (2011). The requirements to reach BREEAM "Excellent" and Code for Sustainable Homes Level 4 are contained within policies H5 and DH1 of the Core Strategy. Any post construction score below this would be contrary to the development plan.	
833001	48	Anne Waite	Charlton Central Residents Association	Introduction	CCRA supports the over-arching concept of this document, which should improve life for all residents of the borough, but has reservations about achievability. Large scale projects by well-known developers with large budgets and a brand name to protect are likely to comply with the vision of Greener Greenwich. However, smaller scale developers are often more anonymous and more inclined to maximise profits at the expense of the well-being of the existing host community and new residents. CCRA believes that more robust wording and procedures are required to ensure conformity with Greener Greenwich, along with equally robust monitoring and enforcement where required by council officers. CCRA supports the concept of sustainability in design and construction but has concerns about the wording used, which may allow scope for some to circumvent the best practice outlined in the document. CCRA requests stronger and tighter wording where indicated under the individual Section comments. CCRA is also concerned about the practical operation of the SPD's provisions. Staff numbers at RBG would also have to increase to monitor the requirements of "Greener Greenwich" and although the document is laudable in content, there must be reservations about practical implementation. Para 1.0.7 states that the SPD is a material consideration when determining planning applications and will be implemented primarily through the development control purpose. Para 1.0.13 states that developers will be expected to submit a Pre-Assessment for all planning applications. The Council will then impose conditions in the planning approval to submit a design stage assessment prior to implementation and a Post-Construction Assessment prior to the first occupation of the development. CCRA's concern is: Are all these assessments to be submitted to RBG's Planning Department? In the past, developers have been able to obtain "sign-off" of a scheme by using private Building Control companies, and it is a concern that this system is outside the control of the LPA and open to abuse. If Post-Assessment is to be within the LPA, what are the implications for staffing? Does RBG have the budget to increase staff numbers within Planning? Para 1.0.14 recommends that developers aim to achieve a mid-point score	The Royal Borough adheres to the legal framework in the UK to assess and determine planning applications. Environmental assessments, such as BREEAM and Code for Sustainable Homes, are required to be independently assessed by certified assessors. As part of the Royal Borough's planning application process, major developments are required to submit to the local planning authority pre design and post construction assessments and a post construction certificate prior to occupation as evidence that the expected standards have been met. The standards set are in line with the expectation of the Mayor's London Plan (2011). The requirements to reach BREEAM "Excellent" and Code for Sustainable Homes Level 4 are contained within policies H5 and DH1 of the Core Strategy. Any post construction score below this would be contrary to the development plan.	

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					of the relevant level to be achieved (BREEAM or Code for Sustainable Homes) in both the Pre-Assessment and Design stage to ensure that any points lost through the construction phase of a development do not result in a lower rating being achieved than was intended. CCRA must ask: Why is the base line set at mid-point? It is appreciated that this allows for some slippage during the construction phase, but this carries the danger of the final score being at the bottom end of the scale. If the base line were set at the three quarter point, there would be a better prospect of high quality delivery.		
831496	10	Mr John Ettridge	Greenwich Community College	Materials	It is important when seeking to use sustainable materials that they, are and will over the life of the building, continue to be fit for purpose.	Agreed. This is covered in paragraph 6.1.1.	No change to document.
832862	18	Katharine Fletcher	English Heritage - London Region	Materials	We welcome the reference to listed buildings in this section on materials, and would suggest that this is broadened to refer to conservation areas as well. In addition, there would be benefit in including a reference to conservation area appraisals here since these will include some analysis of the locally distinctive materials that are characteristic of each area.	Agreed.	This section within the Materials chapter, renamed Statutory Listed Buildings and Conservation Areas, has been strengthened to include more information and guidance, including that on the Royal Borough's conservation area appraisals, Article 4 Directions, and associated guidance.
502194	44	Waite		Materials	Para 6.1.5 Is it not possible to use a stronger form of wording so that local suppliers and sources do get the trade from development in Greenwich? This is vital for local employment and the local economy. Paras 6.2.1 and 6.2.3. The word "expects" carries insufficient weight and it would be desirable to use something stronger.	Noted. Paragraph 6.1.5 of the Greener Greenwich SPD states that developers are encouraged to always seek local suppliers and sources in the first instance.	No change to document.
833001	52	Anne Waite	Charlton Central Residents Association	Materials	Para 6.1.5 CCRA would like to see a stronger form of wording used to ensure that local suppliers and sources do get the trade from development in Greenwich. This is vital for local employment and the local economy. Paras 6.2.1 and 6.2.3. The word "expects" carries insufficient weight and it would be desirable to use something stronger.	Paragraph 6.1.5 of the Greener Greenwich SPD states that developers are encouraged to always seek local suppliers and sources in the first instance.	No change to document.
831496	12	Mr John Ettridge	Greenwich Community College	Policy Context	B.0.75 - As mentioned before, the college would always encourage the use of alternative forms of transport for one to access the facilities / services of the college other than using a car but would also wish the council understand the requirements of the college and that a development by the college could not be 'car free' as this would not meet the needs of the 'Wider Community'.	Noted. Parking requirements are set out in London Plan and Local Plan policies. The Greener Greenwich SPD provides detailed guidance to support these policies, but cannot change them.	No change to document.
832862	19	Katharine Fletcher	English Heritage - London Region	Policy Context	An appendix should be included, referring to relevant sources of information and guidance relating to the historic environment, in particular English Heritage publications and contact details for up-to-date advice. We would recommend that the advice of your conservation staff is sought with regard to incorporating the relevant information concerning the historic environment in the SPD.	Agreed. Direct links have been added to relevant sections. Conservation officers at the Royal Borough were involved in the review of the Greener Greenwich SPD.	The sections on developments to listed buildings, heritage assets or in conservation areas will be strengthened, and reference made to the English Heritage relevant sources of information and guidance.
833001	56	Anne Waite	Charlton Central Residents Association	Policy Context	B.0.75 It would make matters much simpler if a register were to be kept of those addresses not entitled to parking permits.	It would not be an appropriate to include this detail in a sustainable design and construction SPD.	No change to document.

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831496	11	Mr John Ettridge	Greenwich Community College	Pollution	Although the college supports the importance to improve air quality it has concerns as to what the implication would have on the college as mentioned in 8.3.5 which mentions 'securing low levels of car parking for new developments' and would therefore welcome the advice, support and understanding of the council if it were to consider a new development as it continues to cater for the training needs of the wider community. The college would seek further clarification under the construction phase 8.3.62 as to what could be implied by 'restricting certain types of vehicles and 'making a standard one-off financial contribution to an air quality action fund.'	Noted. The Planning Obligations SPD provides clarification on restricting certain vehicle types and financial contributions to an air quality action fund, and this document has already been referenced in paragraph 8.3.61.	No change to document.
831711	20	Mr Laurence Caird		Pollution	8.3.11: Condition d is rather vague. I suggest this relates to development which will do one of three things: 1) Significantly increase traffic volumes; 2) Significantly alter traffic composition (e.g. increase %HGV on network); or 3) Involve construction of new road, junction alterations or changes in carriageway alignment. It would be beneficial to be able to quantify or define significant changes, but I understand this is not necessarily straightforward and may still need to be reviewed on a case by case basis.	Noted.	No change to document.
831711	20	Mr Laurence Caird		Pollution	8.3.18: With respect to dust from construction and demolition, I endorse the view that dust emissions from construction and demolition should never (or at least almost never) present a material justification to refuse a planning permission, but construction dust emissions should be considered to at least some degree for ALL proposed development. It may be most suitable to address this with planning conditions although it would be considered at planning stage for some developments including, but not limited to all EIA developments.	Noted.	No change to document.
831711	20	Mr Laurence Caird		Pollution	8.3.20: The Institute of Air Quality Management also provides useful guidance on the assessment and mitigation of dust during construction and demolition. http://iaqm.co.uk/guidance/	Noted.	A reference will be provided in section 8.3.
831711	20	Mr Laurence Caird		Pollution	8.3.21-8.3.28: In principal, I support this position, particularly due to the local variability of pollutant concentrations close to roadsides (especially NOx). However, I fear the stance to demand a minimum of 6 months site monitoring PRIOR to application submission will be too restrictive in planning terms, especially for small development. I would therefore suggest that these conditions are relaxed to allow for a desk based air quality assessment to be submitted in order to validate the application, with a 6-12 month period of monitoring required to be undertaken, and the air quality assessment updated prior to commencement of works (subject also to production of a mitigation strategy as required). OR It should be made clear that air quality monitoring will only be required for development within the AQMAs.	Noted. References to monitoring will be applied more flexibly.	Text has been amended to reflect more flexibility in the use of site monitoring.
831711	20	Mr Laurence Caird		Pollution	8.3.31: It should be noted that modelling the impacts of congested traffic emissions close to junctions is fraught with uncertainty. Defra emission factors are based on constant vehicle speeds and therefore modelling an average vehicle	Noted.	No change to document.

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					speed does not necessarily represent the reality of a queue of cars which decelerate, stop, idle, and accelerate again as they would in a big queue for a busy junction. Although queue times, lengths and variable average speeds may be included in the model, it would be useful to seek consultation with a transport consultant regarding how easily and robustly these parameters may be estimated, so as not to unnecessarily introduce additional uncertainty into the air quality modelling.		
831711	20	Mr Laurence Caird		Pollution	8.3.48 In terms of mitigation, the suggestion of measures which may be employed is welcomed. I would though add that car-free development (i.e. disabled parking provision only) should be recommended. This does tie in with the London Mayor sustainable design SPD transport emissions benchmarks.	Agreed. There are London Plan and Local Plan policies that support this.	Paragraph 8.3.48 will be amended to include a recommendation for car-free development.
831711	20	Mr Laurence Caird		Pollution	8.3.56 This is welcomed as the best method of helping to minimise the 'background creep' caused by a large number of centralised boiler and CHP emissions in the borough.	Noted.	No change to document.
831711	20	Mr Laurence Caird		Pollution	8.3.71-8.3.73: Modelling of odours can be incredibly uncertain and therefore it is recommended that this is not a stipulated assessment method for all significant odour discharges. Nonetheless, odour modelling definitely has its place, but should be applied carefully and only when it is well justified to do so. It is therefore recommended that this section is simplified to state that for large processes or processes with potentially significant odour releases, a detailed odour assessment is undertaken, which may include one or more of dispersion modelling, source-pathway-receptor risk assessment, odour sampling, and sensory sniff testing. The assessment should follow the guidance set out by the EA (H4 for permitted processes) and Defra (odour guidance for local authorities 2010). You could also add that where modelling is undertaken that odour benchmarks are agreed with the council. There is also new draft odour guidance for planning out for consultation from the IAQM - http://iaqm.co.uk/text/guidance/odour-guidance-2014.pdf .	Noted.	The text has been amended to reflect more flexibility in the use of odour modelling.
474192	25	Environment Agency	Environment Agency	Pollution	Less use should be made of the phrase 'Contaminated Land' as this has a specific legal definition under Part 2A of the Environmental Protection Act 1991, and therefore excludes other areas of land affected by contamination. It is not clear from the section whether any best practice guidance and advice will be appended to this section, but should include the framework from CLR11: Model Procedures for the Management of Land Contamination, and Environment Agency principles.	Noted.	Section 8.1 has been amended to more closely follow the guidance provided by the Environment Agency. Specific reference is now made to the documents cited, including CLR11 and Environment Agency Guiding Principles.
147835	32	Linda Hodgson	Heathway Conservation Area Residents Association	Pollution	The immediate impact of traffic arising from new development is treated in the Air Quality Assessment Report (Appendix A). Such new traffic will also impact on traffic and congestion for the main roads within the borough. This aspect receives somewhat cursory treatment in paragraph A.0.5.	Appendix A sets out the requirements for the preparation of an Air Quality Assessment, which would model a proposed development's potential increase in traffic on the existing road network and the resulting impact on air quality. It is not necessary for wording	No change to document.

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						to be included in paragraph A.0.5 as this is covered within Appendix A.	
502194	46	Waite		Pollution	<p>Para 8.1.4 If RBG does not support excavation and disposal of contaminated waste to landfill, why cannot the practice be banned in this borough? It is not sufficient to say that RBG actively discourages the practice, without specifying what action is actually taken to stop it. With regards to noise pollution, many parts of Greenwich have suffered an increase in aircraft. How can/will RBG or anyone else assess what the future impact of aircraft noise for both existing and future residents will be? Para 8.2.3 (bullet points 1 & 4) is asking the impossible. Air pollution in Greenwich is well-documented, but although some action has been taken it is not enough. Para 8.3.46 states clearly that most new developments are likely to contribute to the already elevated levels of pollution in the borough. Para 8.3.64 also recognises the cumulative effects of development on air quality. RBG lists strategies for improving air quality in this section, but in many cases the requirements only apply to large scale developments, and small scale developments are not being given sufficient attention. Para 8.3.11 needs to take account of small scale developments which cumulatively and incrementally will have an impact. Para 8.3.14 Use of the word "normally" allows room for evasion. Why is it that a development which requires an Environmental Impact Assessment would not automatically include a detailed AQ study? Para 8.3.22 This needs clarification. Use of the word "similar" carries with it the possibility that a monitoring site need not be at the actual development site. "Similar" can be open to varying interpretations resulting in arbitrary decisions and inaccuracy. Para 8.3.23 This is confusing as it states that only if RBG's own monitoring data is used does there need to be a full justification of site comparability. Why? Surely full justification needs to be provided whatever the data monitoring source. Para 8.3.37 Mitigation must always be required where a development is directly adjacent to a busy main road, junction or industrial process. Para 8.1.67 The word "expects" carries little weight and there needs to be stronger wording. Para 8.3.69 The Code of Considerate Constructors is not all it seems. It is funded from registration fees from the construction industry and membership is voluntary. Of course it is desirable that all contractors belong to the scheme (aimed at improving the image of construction), but it is known that there is a difference between what is done at corporate level and what happens on the ground. The employees of some companies which have signed up have not abided by the scheme's principles when working in the borough, and residents who have queried or challenged activities have received verbal abuse from them. This is unacceptable.</p>	Text has been amended to encourage the use of sustainable remediation of all types together with reference to an Environment Agency approved code of practice for sustainable remediation to which developers should have regard. The Council responds to public consultations about changes to London airports like the proposed expansion at Heathrow and has recently submitted comments to Newham Council for its consideration of the London City Airport expansion application. In national planning guidance, where noise levels are above a prescribed level, affected residents are entitled to have noise mitigation paid for by the airport and any planning applications for new development within those zones would need to be designed to mitigate against aircraft noise. Para 8.3.11 does not specify the size of site that is covered by an air quality assessment. Policy E(c) of the Core Strategy gives a design mitigation hierarchy for developments in areas exposed to air pollution exceeding NAQS objectives.	No change to document.
833001	54	Anne Waite	Charlton Central Residents	Pollution	Section 8.1 Contaminated Land. Para 8.1.4 If excavation and disposal of contaminated waste to landfill is not supported by RBG, is it not possible to ban it outright? Merely saying that	The Council responds to public consultations about changes to London airports like the proposed expansion at	No change to document.

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			Association		<p>RBG actively discourages the practice, without specifying what action is actually taken to stop developers/contractors is not enough. Section 8.2 Noise Pollution. Nothing in this section takes adequate account of the aircraft noise problem which has plagued parts of Greenwich since November 2012. There have been many press articles and meetings, but no real alleviation. The situation is especially had in respect of early morning arrivals to Heathrow which start around 04.00hrs. Flight paths have been trialled, get changed without notice and it is hard to see how the noise can be monitored unless there is a roving night-time monitoring team. Also, no-one knows where future airport expansion will be or what the impact on Greenwich will be. Thus it is very difficult for RBG or anyone else to assess what the future impact for existing or future residents will be. Para 8.2.3 (bullet points 1 & 4) is asking the impossible. Section 8.3 Air Pollution Air pollution in Greenwich is a long-standing and emotive issue. Some action has been taken but for many residents it is not enough, especially as para 8.3.46 states that most new developments are likely to contribute to the already elevated levels of pollution in the borough. Para 8.3.64 also recognises the cumulative effects of development on air quality. It is commendable and wise of RBG to list strategies for improving air quality in this section but in many cases the requirements only apply to large scale developments. Small scale developments are not given the same attention. Para 8.3.11 This outlines circumstances in which an Air Quality Assessment is required but it does not go far enough. Small scale developments cumulatively and incrementally will have an impact and these should be taken in to account when determining the need for AQ assessment. Para 8.3.14 Why allow a get-out by using the word "normally"? It is hard to see why a development which requires an Environmental Impact Assessment would not include per se a detailed AQ study. Para 8.3.22 Use of the word "similar" raises concerns that a monitoring site need not be at the actual development site. There is scope for differing interpretations of "similar" and thus for inaccuracy. Para 8.3.23 This is confusing as it states that only if RBG's own monitoring data is used does there need to be a full justification of site comparability. Logic suggests that full justification needs to be provided whoever's data is used. Para 8.3.37 Mitigation should always be required where a development is directly adjacent to a busy main road, junction or industrial process. Para 8.3.67 The word "expects" carries little weight and there needs to be stronger wording. Para 83.69 The Code of Considerate Constructors is voluntary and not legally binding. It is funded entirely by registration fees from the construction industry. Whilst it is desirable that all contractors belong to the scheme (aimed at improving the image of construction), there is scope for abuse as it is already known that some who signed up did not abide by the schemes principles when working in the borough.</p>	<p>Heathrow and has recently submitted comments to Newham Council for its consideration of the London City Airport expansion application. In national planning guidance, where noise levels are above a prescribed level, affected residents are entitled to have noise mitigation paid for by the airport and any planning applications for new development within those zones would need to be designed to mitigate against aircraft noise. Para 8.3.11 does not specify the size of site that is covered by an air quality assessment. Policy E(c) of the Core Strategy gives a design mitigation hierarchy for developments in areas exposed to air pollution exceeding NAQS objectives.</p>	

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147468	28	Mr David Hammond	Natural England, London Region	Strategic Environmental Assessment Screening Document	There is no issue with the conclusions drawn in the screening document. The approach and methodology are acceptable and the conclusion reached should be in line with the relevant legislation.	Noted.	No changes to document.
502194	45	Waite		Waste	Para 7.1.5 In view of the amount of domestic building taking place in Greenwich (loft conversions, extensions etc.) would it not be possible to include these in waste disposal requirements? There have been domestic projects in our area which have resulted in a lot of unsightly and possibly dangerous (e.g. fire risk) waste which has lain around for months in front gardens. To ensure public safety, there should be some requirement for domestic and small expenditure schemes to clear materials within a set time scale. Para 7.1.7 It is puzzling that the SWMP is not mandatory.	A Site Waste Management Plan is no longer required by law however most major developers are still likely to use one. Site waste following construction is controlled by Section 215 of the Town and Country Planning Act 1990 (as amended). The Council is considering the adoption of a standard informative on planning permissions which would warn of enforcement action in the future.	Paragraph 7.1.5 has been amended: "All construction projects are strongly recommended to have a site waste management plan (SWMP)."
833001	53	Anne Waite	Charlton Central Residents Association	Waste	Para 7.1.5 It is appreciated that the financial limit here (£300,000) is designed to exclude domestic schemes but some of these generate a great deal of waste which is left in situ (stacked in front gardens and alleyways and impinging on neighbours land for months). In the interests of public safety, there should be some requirement for domestic and small expenditure schemes to clear materials within a set time scale. Para 7.1.7 It is regrettable that the SWMP is not mandatory.	A Site Waste Management Plan is no longer required by law however most major developers are still likely to use one. Site waste following construction is controlled by Section 215 of the Town and Country Planning Act 1990 (as amended). The Council is considering the adoption of a standard informative on planning permissions which would warn of enforcement action in the future.	Paragraph 7.1.5 has been amended: "All construction projects are strongly recommended to have a site waste management plan (SWMP)."
831496	8	Mr John Ettridge	Greenwich Community College	Water	The college would support the importance to reduce the use of water such as re-use of the water used in a new development as well as considering rainwater harvesting for the use in toilet flushing	Noted	No change to document.
474192	23	Charles Muriithi	Environment Agency	Water	The Flood and Water Management Act 2010 introduces new sewer standards and there is need to identify locations where there is a risk that sewage treatment works will be unable to treat the sewage from the proposed sites for new housing to the standards required to protect water quality, and therefore new infrastructure will need to be brought forward in these areas.	Noted. Locations for significant new development are set out in the London Plan and the Local Plan, which is accompanied by an infrastructure delivery plan. These growth areas have been found sound by an independent inspector through public examination. As an SPD, the Greener Greenwich document provides guidance on development plan policies	Updated Chapter 4 to include a reference to the Flood and Water Management Act.
474192	23	Charles Muriithi	Environment Agency	Water	A reduction in water consumption in new homes has been addressed by CLG through a review of Part G of the Building Regulations (that came into effect in April 2010) and the Code for Sustainable Homes. The Government also allows the planning system to go beyond regulations and mandate water efficiency targets in excess of the Building Regulations, provided there is local need. In addition Part G requirements apply to all domestic refurbishment projects where there is a material change of use and it is compulsory to install a water meter in new homes. New homes built to a 120 litres per head	Agreed.	The following text has been added to Chapter 4: In the Royal Borough new residential developments are expected to have a predicted water consumption that meets the specifications required to achieve Code For Sustainable Homes Level 4 of less than 105 litres/head/day using the Government's national calculation methodology for assessing water efficiency in new dwellings outlined in the <i>Water Efficiency Calculator for New Dwellings</i> .

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					per day, or better, water efficiency standard will have a large positive impact on the supply-demand balance. To successfully proceed with housing growth then water efficiency initiatives are vital to reduce people's daily water use and maintain a supply-demand balance.		
474192	23	Charles Muriithi	Environment Agency	Water	The Environment Agency and stakeholders will work with the Council to ensure that all relevant actions from the Thames River Basin Management Plan are identified, prioritised, resourced and implemented. The document should demonstrate how positively it will contribute to the aspirations of Water Framework Directive, and demonstrate how they will also prevent deterioration.	Noted. The Thames River Basin Management Plan is identified as a key strategic document within the Royal Borough's development plan.	No change to document.
265434	37	Carmelle Bell	Savills for Thames Water Plc	Water	Any new developments should reflect the need for water conservation. The reason for this is that demand for water has been steadily increasing and with factors such as increasing population, wider use of water consuming appliances and climate change, demand is expected to increase further. The promotion and adoption of water efficient practice in new developments will help to manage water resources and work towards sustainable development.	Noted. This is set out in Chapter 4 of the SPD.	No change to document.
502194	42	Waite		Water	Recent weather conditions suggest far more variation and extremes in water supply than have been considered until now. To cover drought as well as flood, wording should be strengthened to ensure that certain measures are obligatory. Para 4.1.8 Rain water harvesting should be obligatory. Para 4.1.9. Installation of rain water butts should be obligatory. Para 4.1.11 Grey water systems should be obligatory.	Noted. The SPD is consistent with the standards set out in the Mayor of London's Sustainable Design and Construction Supplementary Planning Guidance. The Greener Greenwich Supplementary Planning Document (SPD) provides guidance on how new development in Greenwich should be designed and built. It has been prepared to supplement the policies and proposals within the London Plan and the Core Strategy with Detailed Policies, which together form the Development Plan for Royal Greenwich. The SPD notes that planning applications must demonstrate consideration for flood risk, which includes the incorporation of sustainable drainage systems (SUDS) which often incorporate rainwater harvesting. Additionally, the SPD states the requirement for development proposals to incorporate green roofs, where feasible. It is not the intention of this document to cover those aspects of design and construction that are mandatory through the building regulations.	No change to document.
833001	50	Anne Waite	Charlton Central Residents Association	Water	CCRA commends the aims, but if London is as water-stressed as stated, wording should be strengthened to ensure that certain measures are obligatory rather than aspirational. Para 4.1.8 The phrase "rain water should be harvested" needs to be	Noted. The SPD is consistent with the standards set out in the Mayor of London's Sustainable Design and Construction Supplementary Planning	No change to document.

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					replaced by "must be harvested". Para 4.1.9. Installation of rain water butts should be compulsory Para 4.1.11 Grey water systems should be compulsory.	Guidance. The Greener Greenwich Supplementary Planning Document (SPD) provides guidance on how new development in Greenwich should be designed and built. It has been prepared to supplement the policies and proposals within the London Plan and the Core Strategy with Detailed Policies, which together form the Development Plan for Royal Greenwich. The SPD notes that planning applications must demonstrate consideration for flood risk, which includes the incorporation of sustainable drainage systems (SUDS) which often incorporate rainwater harvesting. Additionally, the SPD states the requirement for development proposals to incorporate green roofs, where feasible. It is not the intention of this document to cover those aspects of design and construction that are mandatory through the building regulations.	