

# **Royal Borough of Greenwich**

## **Local Plan**

### **Site Allocations**

#### **Issues and Options Consultation Statement**

**February 2019**

## **I Purpose and Background**

- 1.1 This statement has been prepared in accordance with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which sets out the requirements for public participation and for preparing a consultation statement. It accompanies the Site Allocations Preferred Approach document, a draft Local Plan document that sets out site specific policy for the main sites where development or other change is expected.
- 1.2 The Royal Borough consulted on the Site Allocations Issues and Options document in February 2016, to inform people about the Local Plan document the Royal Borough proposed to prepare and invite them to make representations on what the Site Allocations Local Plan ought to contain.
- 1.3 This consultation statement sets out details of this preliminary consultation that has taken place, which has informed the Site Allocations Preferred Approach document. This statement provides details of who was invited to make representations at the Issues and Options stage; how they were invited to make representations; the main issues raised by respondents; and how the issues raised so far have been addressed in the Site Allocations Preferred Approach document.

## **2 Consultation**

- 2.1 A six week formal public consultation was carried out on the Site Allocations Issues and Options from 15 February to 29 March 2016, in accordance with Regulation 18 and the procedures set out in the Statement of Community Involvement (SCI). This consultation formed the first stage in the preparation of the Site Allocations Local Plan. It included a long list of sites, generally above 0.25ha, with options for future uses.
- 2.2 Sites included in the Issues and Options document were taken from a variety of sources:
  - saved UDP Site Proposals Schedule (addendum to the Core Strategy)
  - sites identified through the evidence base for the Local Plan (Housing Trajectory, London SHLAA 2013, Employment Land Review 2012 and Open Space Study 2008)
  - sites identified in area-based masterplans and site-specific SPDs
  - RBG regeneration and disposals strategies
  - sites with known development interest (sites with planning permission and/or in the planning pipeline)
  - on-going engagement with landowners and developers
- 2.3 This consultation provided six weeks for interested parties to make representations on the content of the Site Allocations Issues and Options. The consultation also included a call for sites, which invited individuals and organisations to put forward

potential sites for redevelopment for the Council to consider for inclusion within the Site Allocations Local Plan.

### **How we consulted**

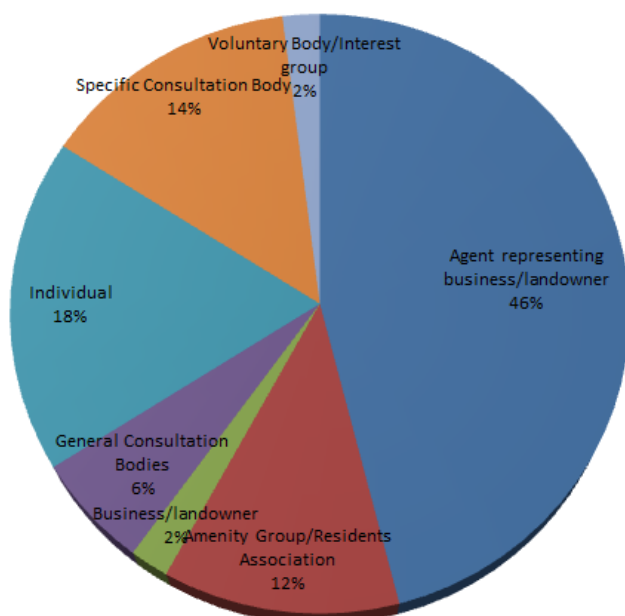
- 2.4 Direct consultees included specific consultation bodies and other statutory bodies, local amenity/residents' groups, businesses, landowners, developers and individual residents. The Royal Borough also sought wider engagement through a variety of methods.
- 2.5 The following consultation activities were undertaken for the Site Allocations Issues and Options, in accordance with the Regulations and the SCI:
- The document was published on the Royal Borough's website, including survey response forms, and hard copies of the document was placed for reference in all borough libraries, and posters were provided to each library to advertise the consultation.
  - Notifications were sent to all those on the Planning Policy Consultation Database (over 1000 entries including specific and general consultation bodies, local residents, businesses, residents/amenity societies, other interest groups, landowners, developers and other interested parties), inviting them make representations and advising them of the timeframe within which representations had to be received.
  - Advertised the consultation by statutory notice in Greenwich Time (Issue 385), via a press release to local papers and on the Royal Borough's social media accounts.
  - Display banners and posters were placed in the three council service centres at Woolwich, Eltham and Greenwich and leaflets were distributed to local community centres.
  - Four consultation drop-in sessions were held, spread across the borough and across the consultation period (Woolwich Library 15 February and 13 March 2016; Eltham Centre 17 February 2016; Greenwich Centre 27 February 2016)
  - Local groups/networks were also able to request that officers attend one of their meetings to discuss the document.
- 2.6 Copies of all consultation material are included in Appendix A.

## **3 Who responded**

- 3.1 Excluding purely call for sites responses, in all there were 285 comments made by 50 respondents. Responses have been broken down into individual comments, to ensure thorough analysis, so an individual respondent may have several comments registered to them if they commented on more than one thing. The full list of representations received and the council's response to these is included in Appendix B.
- 3.2 The majority of responses were from individuals and businesses/landowners. A number of residents/amenity groups also responded to the consultation. While some residents/ amenity groups made general comments about the overall document, many

focused their comments on sites proposed within their local area and some also proposed additional sites.

*Figure 1 Responses by type*



### Call for sites responses

- 3.3 The Issues and Options consultation also included a call for sites exercise. Sites were submitted by landowners, developers, individuals and community organisations. A mixture of uses was proposed for the additional sites put forward, with the majority proposed for residential or mixed uses.
- 3.4 In total 54 individual sites were put forward for consideration. Two of those sites, Saxon Wharf and Pettman Crescent/Gyratory, have been taken forward into the Preferred Approach document. The remaining sites were excluded for one/a combination of the following reasons:
- No clear link to the delivery of Core Strategy objectives/policies
  - The size of the site is insufficient (generally less than 0.25ha) to make a significant contribution to the delivery of the Core Strategy.
  - The principle of the proposed use has been previously established on the site.
  - The site has planning permission for the proposed use and a significant proportion of the permitted development has been delivered.
  - The existing use(s) on the site are protected by the Development Plan.
  - The proposed use is contrary to the Core Strategy, London Plan, and/or existing policy designations.

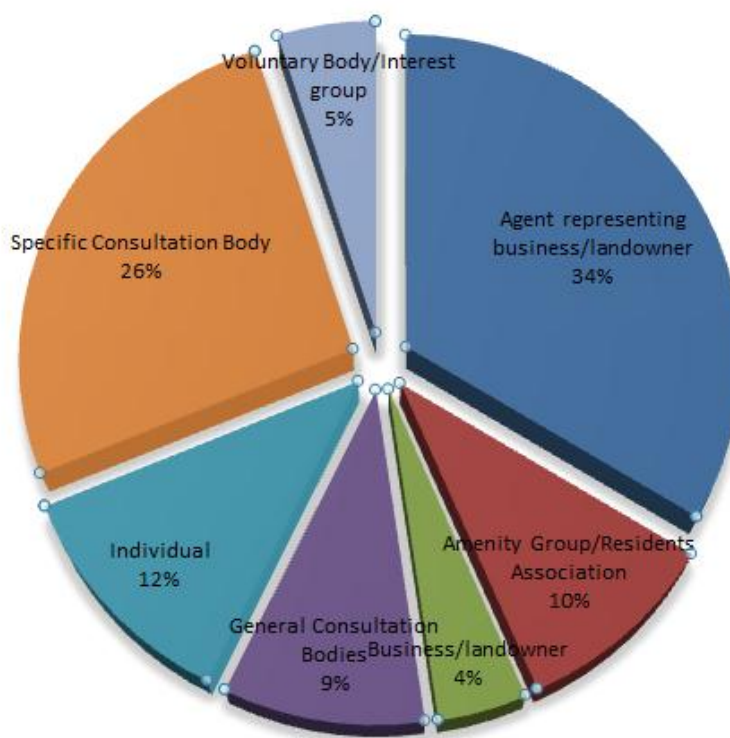
- The indicative delivery timeframe is beyond the plan period, as determined by the London SHLAA.

3.5 Refer to Appendix B of the Site Allocations Preferred Approach document for details of the sites submitted as part of the call for sites exercise.

## 4 Analysis of responses

4.1 The majority of comments were from landowners/their agents (38%), then specific consultation bodies (26%). Comments by residents/amenity groups and individuals formed 22% of the total.

*Figure 2 Individual comments by respondent type*



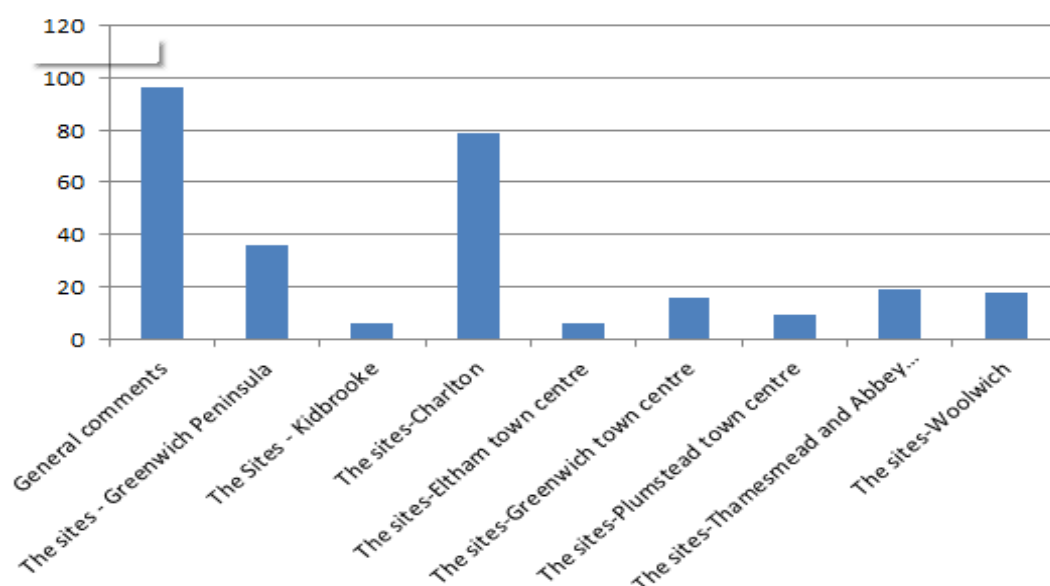
4.2 Of the 285 individual comments received, 68 percent of these resulted, directly or indirectly, in a positive action being taken in the preparation of the Preferred Approach document. These actions are categorised as:

- Alter site boundary
- Amend text for clarity
- Amend plans
- Amend maps for clarity
- Amend allocation

- Exclude site from allocation
- Strengthen evidence base
- Note
- None required

4.3 Figure 3 below breaks down the comments in relation to each of the areas within which sites fall. Responses by local residents/amenity societies were largely contained to sites to the east and south of the borough. Two individual responses were received regarding sites in Plumstead. However, sites in Woolwich, Thamesmead and Abbey Wood did not receive any comments by individuals or residents/amenity societies.

*Figure 3 Number of comments by area*



### **Charlton Riverside**

- 4.4 This was by far the most commented on area within the Issues and Options consultation. This likely reflects both the scale of the development potential in the area and that consultation on the Issues and Options Document took place prior to the adoption of the new Charlton Riverside SPD (July 2017), which sets a clear direction of travel for the development of the area.
- 4.5 Significant concerns were raised regarding potential impact of the proposed allocations in the Charlton Riverside area on the safeguarded wharves and aggregates zone. As a result, the wording of proposed allocations which potentially impact wharf operations is explicit that new development must ensure the continued, unfettered operation of these sites.
- 4.6 A number of comments also questioned the viability of some of the Strategic Industrial Land (SIL) located within some of the allocated sites in this area. A significant area of

SIL was released when the Core Strategy adoption, and the majority of the SIL located in these areas is currently in active use. Greenwich is identified as a retain capacity borough by the 2017 London Industrial Land Demand Study for the purposes of industrial land management, therefore the current evidence base does not support the release of SIL.

### **Eltham**

- 4.7 Responses for sites proposed in Eltham were limited to a landowner and a local amenity society. Information from the landowner has led to the exclusion of one site from allocation as there is reasonable doubt over the prospect of the site being brought forward for development within the plan period. The amenity society also proposed removal of this allocation. Comments from the amenity society have been considered and various alterations to allocations have been made. These include detail within allocations and the alteration of a site boundary.
- 4.8 Further to the Eltham proposals, numerous letters and a petition were received in relation to a site in the south-eastern part of Eltham, known as the Gaelic Athletic site, requesting that the current designation of the site be retained. The strength of feeling in relation to that site was clear. However, it would have been inappropriate to include that site Preferred Approach document as there were no alterations proposed to the designation that already existed for the site. Nonetheless, since the Issues and Options document was consulted on this site has been granted planning permission for development on appeal to the Planning Inspectorate.

### **Greenwich Peninsula**

- 4.9 There was significant concern that the Greenwich Peninsula sites, which were largely covered by the Peninsula Masterplan, were shown as separate sites. It was felt that this may lead to development that was piecemeal in nature and contrary to the masterplan itself. As a result of this, moving forward, all of the individual sites within the Peninsula Masterplan have been amalgamated into one allocation.
- 4.10 A concern of landowners/developers in this area was the use of Strategic Industrial Land (SIL). The Issues and Options document suggested that there may be potential to review SIL boundaries as part of the Site Allocations Local Plan. However, further work and examination of the evidence base show that there is no justification for the revision of SIL boundaries through the Site Allocations Local Plan. The London Industrial Land demand Study (2017), identifies Greenwich as a retain capacity borough for the purposes of industrial land management.

### **Greenwich Town Centre**

- 4.11 Comments were generally supportive of the proposed allocations in Greenwich Town Centre. However, all but one of the proposed allocations in the area have been removed from the Site Allocations Preferred Approach document. This is because the sites have either already been developed or existing local plan policies provide sufficient guidance regarding their future development. The remaining site has been redefined as being within Greenwich Creekside for the purposes of clarity and to better reflect the location of the site within the borough.

### **Kidbrooke**

- 4.12 There were few comments on the sites within this area. Those received were from one agent on behalf of a developer, one individual and one amenity society. All respondents showed support for the allocation of sites in this area. Comments from the local amenity society were generally supportive of the proposed allocations but had concerns over the evidence base and some detail. Further detail has been provided in the Preferred Approach document to overcome these concerns.

### **Plumstead**

- 4.13 Comments were generally supportive of the allocation of sites in Plumstead. However there was concern about the loss of leisure facilities and parking. Since the Issues and Options Document was produced some of the sites have come forward for development, for example Plumstead Library (P2). The intensification of uses on this site and the provision of leisure facilities has gone some way to address the concerns raised on this point but has resulted in site P2 being removed from the next draft of the Site Allocations.
- 4.14 In addition the car park site Located in Aberly Street has been removed from the next draft of the plan as it is too small to be of strategic importance. Its removal does however address the parking concerns raised by residents. The Council has since confirmed it does not intend to dispose of this site nor change its use. Generally comments received were in favour of supporting small business and the provision of community facilities. This has been taken forward in the Preferred Approach document.

### **Thamesmead and Abbey Wood**

- 4.15 Responses on these sites were received from landowners and consultation bodies only. Overwhelmingly there was support for the allocation of various sites for development. However, it was thought that the breakdown of the sites led to a piecemeal approach and would not reflect the comprehensive development potential of the area. As a result five of the sites have been amalgamated into two much larger sites and another site has had its boundary extended. The responses sought further detail/clarity for a number of the allocations, and these matters have been addressed in the Preferred Approach document.

### **Woolwich**

- 4.16 Support for mixed use and residential-led development was a common theme through the comments on these sites. However allocations for open space and industrial uses were less supported, particularly by landowners/developers. The allocations have been clarified regarding these matters. It is notable that there were no comments directly from individuals or local amenity societies in relation to sites within Woolwich.

### **General comments**

- 4.17 Several of the responses commented that they felt there were gaps in the evidence base that had informed the Issues and Options. Since the Issues and Options document was consulted on the following new/updated evidence base documents have been published and have informed the Preferred Approach document:



- RBG Retail and Leisure Study, 2018
  - RBG Strategic Flood Risk Assessment (SFRA), Level 1 (2017) and Level 2 (2018)
  - RBG Towards Greener Royal Greenwich: Green Infrastructure Study, 2017
  - RBG Gypsy and Traveller Accommodation Assessment (GTAA), 2016
  - South East London Joint Waste Technical Paper, 2017
  - London Strategic Housing Land Availability Assessment (SHLAA), 2017
  - London Strategic Housing Market Assessment (SHMA), 2017
  - London Industrial Land Demand Study, 2017
  - London Industrial Intensification Primer, 2017
  - London Office Policy Review, 2017
  - Projections of demand and supply for visitor accommodation in London, 2017
  - Mayor's Transport Strategy 2018
  - Mayor of London Safeguarded Wharves review, 2018
- 4.18 The Mayor has also published a draft New London Plan, which has informed the Preferred Approach (the draft New London Plan is undergoing Examination in Public between January and May 2019). Refer to Appendix D of the Preferred Approach document for a full list of the evidence base documents that have information the draft Plan.

## 5 Summary

- 5.1 The preparation of a Site Allocations Local Plan is generally supported. However, it was generally felt that the Issues and Options document lacked detail and evidential support. These matters have been addressed both on a site by site basis and generally throughout the Preferred Approach document in the following ways: the evidence base has been significantly strengthened; a number of sites have been removed from the draft Plan; various sites have been subject to boundary changes; sites have been amalgamated where this would result in a more comprehensive approach; two new sites have been added as a result of the call for site exercise; and a greater level of detail has been provided within individual allocations.

## Appendix A Notification and publicity material for Issues and Options consultation

**Royal Greenwich Local Plan: Site Allocations**

### Help us to plan the future of Royal Greenwich

Is there a site near you that might be suitable for development or that needs protecting?  
What uses would be appropriate on these sites?



The Council is preparing a new planning policy document called Site Allocations. This document will support the existing Core Strategy policies and provide additional detail on specific sites that will help to deliver the Core Strategy's priorities.

We are currently at an early stage in the preparation of the document. We have put forward some ideas of sites that may be appropriate to be included, and are now asking for your views on these sites and any others that you think we should consider.

If you want to speak to us in person or would like more information, then come along to one of our drop in sessions.

**How can I get involved?**

Go onto our website [www.greenwich.gov.uk/siteallocations](http://www.greenwich.gov.uk/siteallocations) where you will find an interactive map of all the sites we have proposed so far. You can also read the document here and make your comments online.

If you prefer, there are hard copies to read and questionnaires to fill in at any library in the Borough.

We need your comments by **Tuesday 29th March 2016**, so make sure you respond before then.

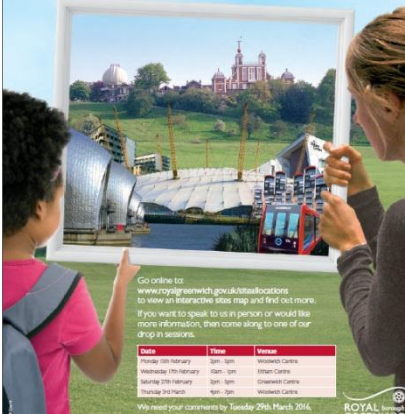
| Date              | Time       | Venue            |
|-------------------|------------|------------------|
| Mon 15th February | 2pm - 5pm  | Woolwich Centre  |
| Wed 17th February | 10am - 1pm | Eltham Centre    |
| Sat 27th February | 2pm - 5pm  | Greenwich Centre |
| Thu 3rd March     | 4pm - 7pm  | Woolwich Centre  |

ROYAL borough of GREENWICH

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ROYAL borough of GREENWICH

**Royal Greenwich Local Plan: Site Allocations**

### Help us to plan the future of Royal Greenwich

Visit a drop in session...

If you want to speak to us in person or would like more information, then come along to one of our drop in sessions coming up across the Borough.

| Date                    | Time       | Venue            |
|-------------------------|------------|------------------|
| Monday 15th February    | 2pm - 5pm  | Woolwich Centre  |
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Contact us by email: [planning.policy@royalgreenwich.gov.uk](mailto:planning.policy@royalgreenwich.gov.uk)  
or call on 020 8921 6235  
or go to [www.royalgreenwich.gov.uk/siteallocations](http://www.royalgreenwich.gov.uk/siteallocations)

We need your comments by **Tuesday 29th March 2016**, so make sure you respond before then.

[www.royalgreenwich.gov.uk/siteallocations](http://www.royalgreenwich.gov.uk/siteallocations)

ROYAL borough of GREENWICH

Messenger 4G 10:57 81%

Royal Borough of Greenwich  
25 February 2016

As part of planning policy, we're identifying particular sites in Royal Greenwich for specific uses. We'd like you to tell us what you think about the sites, suggest new sites or comment on the plan. This consultation ends at 5pm on 29 March 2016.  
[www.royalgreenwich.gov.uk/siteallocations](http://www.royalgreenwich.gov.uk/siteallocations)

ROYALGREENWICH.GOV.UK  
Site Specific Allocations - Local Development Framework - Greenwich

Like Comment Share

Be the first to like this

Write a comment...

Royal Greenwich (@Royal\_Greenwich) tweeted at 0:38 pm on Thu, Feb 25, 2016:  
We're identifying sites in Royal Greenwich for specific uses. Comment on the site allocations or suggest new sites: <https://t.co/vAVIZALj8n>  
([https://twitter.com/Royal\\_Greenwich/status/702835097100292096?s=03](https://twitter.com/Royal_Greenwich/status/702835097100292096?s=03))

Get the official Twitter app at <https://twitter.com/download?s=13>

Royal Greenwich (@Royal\_Greenwich) tweeted at 2:44 pm on Thu, Mar 24, 2016:  
Our site allocations consultation looking a identifying new sites for specific uses closes on Tuesday. Take part now <https://t.co/jLzsvbGUTP>  
([https://twitter.com/Royal\\_Greenwich/status/713013511320944641?s=03](https://twitter.com/Royal_Greenwich/status/713013511320944641?s=03))

Get the official Twitter app at <https://twitter.com/download?s=13>

**Public Notice**  
**NOTICE OF SITE ALLOCATIONS (ISSUES AND OPTIONS) LOCAL PLAN**  
**Planning and Compulsory Purchase Act 2004**  
**Town and Country Planning (Local Planning) (England) Regulations 2012**  
**Notice of Intention to Consult on the Site Allocations Local Plan**

Royal Borough of Greenwich is inviting public representations on the Site Allocations Local Plan. This document will support the existing Core Strategy policies and provide additional detail on specific sites that will help to deliver the Core Strategy's priorities. The Issues and Options for the Site Allocations Plan sets out initial ideas for site allocations for housing, employment, retail and community open space. It asks questions to seek the public's views on the approach taken in the document including the site suggestions, or whether other sites and proposals should be considered.

Representations on the Site Allocations Local Plan can be made between 15th February and 29th March 2016. The document can be viewed online using the interactive map at [www.royalgreenwich.gov.uk/siteallocations](http://www.royalgreenwich.gov.uk/siteallocations). Hard copies are available for public inspection at the Woolwich Centre, 35 Wellington Street, Woolwich, London SE18 6HQ Monday – Friday between 9am and 4.30pm, as well as in Royal Greenwich libraries.

|   |  |  |   |  |  |
|---|--|--|---|--|--|
| <b>Abbey Wood Library</b><br>Mon: 2pm to 7pm<br>Tues: 9am to 5.30pm<br>Wed: Closed<br>Thurs: 2pm to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: Closed<br>Closed for lunch 1pm to 2pm        | <b>Blackheath Library</b><br>Mon: 10am to 7pm<br>Tues: 9am to 5.30pm<br>Wed: 9am to 5.30pm<br>Thurs: 9am to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: Closed        | <b>Charlton Library</b><br>Mon: 2pm to 7pm<br>Tues: 9am to 5.30pm<br>Wed: Closed<br>Thurs: 2pm to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: Closed<br>Closed for lunch 1pm to 2pm | <b>Thamesmere Library</b><br>Mon: 7am to 9.30pm<br>Tues: 7am to 9.30pm<br>Wed: 7am to 9.30pm<br>Thurs: 7am to 9.30pm<br>Fri: 7am to 9.30pm<br>Sat: 8am to 5.30pm<br>Sun: 8am to 5pm<br>Unstaffed for lunch 1 to 2pm | <b>Plumstead Library</b><br>Mon: 9am to 7pm<br>Tues: 9am to 5.30pm<br>Wed: Closed<br>Thurs: 9am to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9.30am to 5pm<br>Sun: Closed                                | <b>West Greenwich Library</b><br>Mon: 2pm to 7pm<br>Tues: 9am to 5.30pm<br>Wed: Closed<br>Thurs: 9am to 7pm<br>Fri: 2pm to 5.30pm<br>Sat: 9am to 5pm<br>Sun: Closed            |
| <b>Coldharbour Library</b><br>Mon: 2pm to 5.30pm<br>Tues: 9am to 5.30pm<br>Wed: Closed<br>Thurs: 2pm to 5.30pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: Closed<br>Closed for lunch 1pm to 2pm | <b>Greenwich Centre Library</b><br>Mon: 10am to 6pm<br>Tues: 10am to 6pm<br>Wed: 10am to 8pm<br>Thurs: 10am to 6pm<br>Fri: 10am to 6pm<br>Sat: 10am to 5pm<br>Sun: 12pm to 4pm | <b>Eltham Centre Library</b><br>Mon: 9am to 7pm<br>Tues: 9am to 5.30pm<br>Wed: 9am to 5.30pm<br>Thurs: 9am to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: 10am to 4pm               | <b>New Eltham Library</b><br>Mon: 2pm to 7pm<br>Tues: 9am to 5.30pm<br>Wed: Closed<br>Thurs: 2pm to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: Closed   | <b>Slade Centre Library</b><br>Mon: 2pm to 7pm<br>Tues: 9am to 5.30pm<br>Wed: Closed<br>Thurs: 2pm to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: Closed<br>Closed for lunch 1pm to 2pm | <b>Woolwich Centre Library</b><br>Mon: 9am to 7pm<br>Tues: 9am to 5.30pm<br>Wed: 9am to 5.30pm<br>Thurs: 9am to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: 12 to 4pm |

The three main libraries- Woolwich Centre, Greenwich Centre and Eltham Centre- will also host an exhibition with a banner. The exhibitions will run throughout the consultation period. In addition to the on-going exhibition in these libraries, there are four drop-in sessions where a member of staff will be able to give further information. These are:

| Date                    | Time   | Venue            |
|-------------------------|--------|------------------|
| Monday 15th February    | 2-5pm  | Woolwich Centre  |
| Wednesday 17th February | 10-1pm | Eltham Centre    |
| Saturday 27th February  | 2-5pm  | Greenwich Centre |
| Thursday 3rd March      | 4-7pm  | Woolwich Centre  |

Representations in respect of the draft Site Allocations Local Plan can be submitted via the interactive map at [www.royalgreenwich.gov.uk/siteallocations](http://www.royalgreenwich.gov.uk/siteallocations) or sent by email to [planning.policy@royalgreenwich.gov.uk](mailto:planning.policy@royalgreenwich.gov.uk); or by post to The Royal Borough of Greenwich Planning Policy Team, 5th Floor, The Woolwich Centre, 35 Wellington Street, Woolwich, London, SE18 6HQ by 5pm Tuesday 29th March 2016.

**Adoption of the Site Allocations Local Plan**

This is the first consultation stage in the preparation of the Site Allocations Plan. The Plan has to go through various stages of preparation and will be subject to examination in public by an independent Inspector before it can be adopted by the Council.

Dear [insert name]

## **Royal Greenwich Site Allocations - help us to plan the future of Greenwich**

The Council is preparing a new planning policy document called Site Allocations. This document will support the existing Core Strategy policies and provide additional detail on specific sites that will help to deliver the Core Strategy's priorities. We are currently at an early stage in the preparation of the document. We have put forward some ideas of sites that may be appropriate to be included, and are now asking for views on these sites and any others that we should consider.

### **How can you get involved?**

If you would like to get involved in the consultation, then please take a look at the enclosed leaflet for details on how to view the document, exhibitions you can attend and how you can let us know your views.

### **Ask us to come to you...**

If you are part of a larger group or network, then we may also be able to come along to one of your meetings and give you a bit more information about how the Site Allocations document might affect you. We can also provide you with a few more leaflets to distribute. Please get in touch if you would like to discuss this further.

The consultation starts on Monday 15<sup>th</sup> February. Please make sure you let us have your comments by 5pm, **Tuesday 29<sup>th</sup> March 2016**. The information you provide will help to formulate the next version of the document, which should be out for consultation later in the year. We welcome your comments on Site Allocations. However, if you do not wish to be consulted further in the future, then please let us know so we can remove you from our database.

Yours sincerely,

Clare Loops  
**Planning Policy Manager**

# STATEMENT OF REPRESENTATIONS PROCEDURE

Under Regulation 17 of the Town and Country Planning (Local Planning) (England) Regulations 2012 The Royal Borough of Greenwich gives notice that the Site Allocations Local Plan Issues and Options has been published for consultation.

The Royal Borough of Greenwich is inviting representations on this document over a period of six weeks from 15<sup>th</sup> February to 29<sup>th</sup> March 2016. Hard copies of the Site Allocations Local Plan will be available to view during this time, at the Woolwich Centre, The Woolwich Centre, 35 Wellington Street, Woolwich, SE18 6HQ.

## How can you respond?

- You submit your comments using the interactive map at [www.royalgreenwich.gov.uk/siteallocations](http://www.royalgreenwich.gov.uk/siteallocations). The full document is also available here.
- Alternatively, you can email: [Planning.policy@royalgreenwich.gov.uk](mailto:Planning.policy@royalgreenwich.gov.uk)
- If you would prefer you can view a hard copy of the Site Allocations Local Plan at the Woolwich Centre, 35 Wellington Street, Woolwich, London SE18 6HQ.
- The Site Allocations Local Plan will also be available in Royal Greenwich Libraries. Please see below for days and times of opening.
- You can also respond by post to:

**Royal Borough of Greenwich**  
**Planning Policy Team**  
**5<sup>th</sup> Floor, The Woolwich Centre**  
**35 Wellington Street**  
**London SE18 6HQ**

Please ensure you submit your comments by 5pm, Tuesday 29<sup>th</sup> March 2016.

|  |  |  |  |   |   |
|--|--|--|--|---|---|
| <b>Abbey Wood Library</b><br>Mon: 2pm to 7pm<br>Tues: 9am to 5.30pm<br>Wed: Closed<br>Thurs: 2pm to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: Closed<br>Closed for lunch 1pm-2pm.       | <b>Blackheath Library</b><br>Mon: 10am to 7pm<br>Tues: 9am to 5.30pm<br>Wed: 9am to 5.30pm<br>Thurs: 9am to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: Closed        | <b>Charlton Library</b><br>Mon: 2pm to 7pm<br>Tues: 9am to 5.30pm<br>Wed: Closed<br>Thurs: 2pm to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: Closed<br><br>Closed for lunch 1pm-2pm. | <b>Thamesmere Library</b><br>Mon: 7am to 9.30pm<br>Tues: 7am to 9.30pm<br>Wed: 7am to 9.30pm<br>Thurs: 7am to 9.30pm<br>Fri: 7am to 9.30pm<br>Sat: 8am to 5.30pm<br>Sun: 8am to 5pm<br>Unstaffed for lunch 1-2pm | <b>Plumstead Library</b><br>Mon: 9am to 7pm<br>Tues: 9am to 5.30pm<br>Wed: Closed<br>Thurs: 9am to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9.30am to 5pm<br>Sun: Closed                                 | <b>West Greenwich Library</b><br>Mon: 2pm to 7pm<br>Tues: 9am to 5.30pm<br>Wed: Closed<br>Thurs: 9am to 7pm<br>Fri: 2pm to 5.30pm<br>Sat: 9am to 5pm<br>Sun: Closed         |
| <b>Coldharbour Library</b><br>Mon: 2pm to 5.30pm<br>Tues: 9am to 5.30pm<br>Wed: Closed<br>Thurs: 2pm to 5.30pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: Closed<br>Closed for lunch 1pm-2pm | <b>Greenwich Centre Library</b><br>Mon: 10am to 6pm<br>Tues: 10am to 6pm<br>Wed: 10am to 8pm<br>Thurs: 10am to 6pm<br>Fri: 10am to 6pm<br>Sat: 10am to 5pm<br>Sun: 12pm to 4pm | <b>Eltham Centre Library</b><br>Mon: 9am to 7pm<br>Tues: 9am to 5.30pm<br>Wed: 9am to 5.30pm<br>Thurs: 9am to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: 10am to 4pm                 | <b>New Eltham Library</b><br>Mon: 2pm to 7pm<br>Tues: 9am to 5.30pm<br>Wed: Closed<br>Thurs: 2pm to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: Closed  | <b>Slade Centre Library</b><br>Mon: 2pm to 7pm<br>Tues: 9am to 5.30pm<br>Wed: Closed<br>Thurs: 2pm to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: Closed<br>Closed for lunch 1pm to 2pm. | <b>Woolwich Centre Library</b><br>Mon: 9am to 7pm<br>Tues: 9am to 5.30pm<br>Wed: 9am to 5.30pm<br>Thurs: 9am to 7pm<br>Fri: 9am to 5.30pm<br>Sat: 9am to 5pm<br>Sun: 12-4pm |

Representations may be accompanied by a request to be notified of any of the submission of the Plan for independent examination, the publication of the recommendations of the person appointed to carry out an independent examination, and the adoption of this Plan.

## Appendix B Representations received and RBG response

| ID | Type of organisation                   | Name                               | Section             | Site Ref | Summary of comments  | RBG response  |
|----|--|------------------------------------|---------------------|----------|--|---|
| I  | Agent representing business/ landowner | Berkeley Homes c/o Barton Willmore | The sites- Woolwich | W12      | <p>We have reviewed the Issues and Options Consultation Document and we would like to remind Officers of the following:</p> <ul style="list-style-type: none"> <li>• Where uses for sites are being suggested it is important to remember that these uses will need to be consistent with planning policies set out in the Development Plan (para 1.9 of the Issues and Options Consultation).</li> <li>• The consultation is not an opportunity to challenge adopted local plan policies within the Core Strategy, including those boundaries that have already been set through policies within the Core Strategy (para 1.10).</li> <li>• The purpose of the Site Allocations is to reflect the Core Strategy, ensuring that we get the right development in the right place and at the right time (para 1.17)</li> <li>• All sites submitted will be rigorously assessed to ensure that they will contribute to the delivery of the spatial strategy and objectives of the Core Strategy (para 1.18).</li> </ul>  | All sites included in the Issues and Options will be reassessed against consistent criteria, including compliance with the Development Plan, prior to inclusion in the Preferred Approach   |
| I  | Agent representing business/ landowner | Berkeley Homes c/o Barton Willmore | The sites- Woolwich | W12      | <p>The delivery of the Woolwich SDL vision – Section 3.3 of the Core Strategy sets out the aspirations of the Woolwich SDL and it does not make any reference to the allocation of a Strategic Industrial Business Park (IBP), further demonstrating that the proposed allocation is not consistent with the principles of the adopted Core Strategy. The vision for Woolwich is to capitalise on its strengths as well as the centre's heritage and riverside location. Its strengths are increasing transport connections and the potential to be a metropolitan centre. Seeking to ensure that we get the right development in the right place and in line with the aspiration, it is not comprehensible to allocate this location for SIL. This is one of the most accessible parts of the borough with increasing population which has already seen significant growth of residential and retail, but has scope for much more. Therefore to seek to protect this Site as a designated SIL is not in accordance with this vision or capitalising on its strengths.</p> | It is agreed that it is not appropriate to seek to alter SIL boundaries through the Site Allocations process and that while the vision for Woolwich set out in the Core Strategy does seek significant employment growth in the area, this is not envisaged to be delivered via the identification of a new area of SIL. The site is identified in the 2012 Employment Land Review as an important local industrial site, and recommended for designation as such. The next version of the Site Allocations will ensure that the proposed allocation is consistent with both the existing development plan and the most up-to-date evidence regarding employment land/industrial land demand. |



| ID | Type of organisation                   | Name                               | Section             | Site Ref | Summary of comments   | RBG response  |
|----|--|------------------------------------|---------------------|----------|---|---|
| I  | Agent representing business/ landowner | Berkeley Homes c/o Barton Willmore | The sites- Woolwich | W12      | The Woolwich Town Centre SPD, which is a material consideration, identifies this area for future mixed use development. The proposed allocation is not consistent with this and actually restricts the masterplan vision from becoming a reality.   | The site is identified in the 2012 Employment Land Review as an important local industrial site, and recommended for designation as such. The next version of the Site Allocations will ensure that the proposed allocation is consistent with both the existing development plan and the most up-to-date evidence regarding employment land/industrial land demand. As set out in the Local Development Scheme, the Woolwich Town Centre SPD will be updated in 2018/2019.               |
| I  | Agent representing business/ landowner | Berkeley Homes c/o Barton Willmore | The sites- Woolwich | W12      | For the fundamental reason above and the additional points, it is considered that the proposed allocation should be amended. In line with the SDL vision and the Woolwich Town Centre SPG, the option for future use should be identified for residential-led mixed use development (subject to overcoming policy EA(a)).   | The site is identified in the 2012 Employment Land Review as an important local industrial site, and recommended for designation as such. The next version of the Site Allocations will ensure that the proposed allocation is consistent with both the existing development plan and the most up-to-date evidence regarding employment land/industrial land demand. As set out in the Local Development Scheme, the Woolwich Town Centre SPD will be updated in 2018/2019.               |
| I  | Agent representing business/ landowner | Berkeley Homes c/o Barton Willmore | The sites- Woolwich | W12      | Furthermore, the allocation is not considered appropriate for the following reasons:<br>1. Lack of policy justification to allocate land for industrial use to compensate for loss of employment land in Charlton Riverside and elsewhere – Nowhere under Section 3.3 in the Core Strategy, in relation to Charlton SDL, is there any reference to Industrial Land having to be re-provided elsewhere within the borough to enable the SDL to come forward for development. Indeed, Policy EA2 – Charlton Riverside – in the Core Strategy talks about retained Strategic Industrial Land, and makes no reference to any further industrial land having to be re-provided elsewhere. More | It is agreed that it is not appropriate to seek to alter SIL boundaries through the Site Allocations process and that the release of SIL through the Core Strategy was not predicated on the designation of new areas of SIL through the Site Allocations. The site is identified in the 2012 Employment Land Review as an important local industrial site, and recommended for designation as such. The next version of the Site Allocations will ensure that the proposed allocation is |

| ID | Type of organisation                   | Name                               | Section             | Site Ref | Summary of comments   | RBG response  |
|----|--|------------------------------------|---------------------|----------|---|---|
|    |  |                                    |                     |          | specifically, paragraph 4.2.8 of the Core Strategy states: "Charlton Riverside is under-used and currently consists mainly of low density industrial units. There are some vacant units and the area is of poor environmental quality. There will be an intensification of use of remaining employment land resulting in no net loss of employment across Royal Greenwich." Furthermore, Policy EA4 in the Council's Core Strategy highlights that the two following areas in Charlton are to be retained as Strategic Industrial Locations: Charlton Riverside East, an Industrial Business Park (IBP); Charlton Riverside West (including Aggregates Zone), a Preferred Industrial Location (PIL); and In addition, the only other locations identified in Policy EA4 are Greenwich Peninsula and West Thamesmead / Plumstead. There are no locations in Woolwich identified for Strategic Industrial Locations (SIL). On this basis, there is no Core Strategy policy basis for justifying the allocation of Site W12 Arsenal Way as an Industrial Business Park (IBP). Whilst it is noted that Policy EA(a) seeks to protect local employment locations, as highlighted above, any allocation need to be consistent with planning policies set out in the Development Plan and we do not consider that there is sufficient consistency in this instance to justify an allocation for SIL. | consistent with both the existing development plan and the most up-to-date evidence regarding employment land/industrial land demand.   |
| 1  | Agent representing business/ landowner | Berkeley Homes c/o Barton Willmore | The sites- Woolwich | W12      | Site W12: As noted in Table 5.1 in the draft Site Allocations document, this site is located in the Woolwich Strategic Development Location (SDL). In addition to this allocation a large part of the Site is located in the Royal Arsenal Conservation Area and is identified as a risk of flooding. The Site is not however identified in the London Plan or Core Strategy (Figure 1 Key Diagram, Policy EA4 or Policies Map) as a Strategic Industrial Location (either (a) Industrial Business Park or (b) Preferred Industrial Location). The proposed use for 'Industrial Business Park (IBP), a type of strategic industrial land' is therefore not in accordance with the adopted London Plan and Core Strategy with Detailed Policies. This is a fundamental issue and it does not meet the necessary tests as highlighted above.  | It is agreed that the site is not identified as a Strategic Industrial Location in the Core Strategy or the London Plan. The site is identified in the 2012 Employment Land Review as an important local industrial site, and recommended for designation as such. The next version of the Site Allocations will ensure that the proposed allocation is consistent with both the existing development plan and the most up-to-date evidence regarding employment land/industrial land demand. |
| 2  | Amenity                                | Blackheath                         | General             |          | It is regrettable that there is, from page 36 on through to page  | Figures and maps will be clarified and  |



| ID | Type of organisation                 | Name               | Section               | Site Ref | Summary of comments  | RBG response   |
|----|--------------------------------------|--------------------|-----------------------|----------|--|--|
|    | Group/ Residents Association         | Society            | comments              |          | 104, a conflict whereby the maps do not maintain a constant orientation and dispense with the established tradition of north points being set towards the top of the page. This, in our view makes for uneasy viewing and understanding of the material.   | consistently orientated in subsequent versions of the Site Allocations.  |
| 2  | Amenity Group/ Residents Association | Blackheath Society | General comments      |          | Para 4.2: We note and support the statement that “new housing is expected to be provided in the identified strategic development locations ....., and in the London Plan opportunity areas .....” There is, however, no mention here of Areas of Intensification, the category into which the Kidbrooke area falls (See subsequent Para 5.41.) Areas of Intensification are under the control of the London Mayor. The Royal Borough should be constantly vigilant if, as may well be the case in the future, in ongoing developments, the number of housing units and the number of people living in them threaten the upper limits set in the London Plan.   | The Core Strategy sets out the spatial strategy for the borough, and the role of the Site Allocations is to set out further guidance on key sites to ensure that they come forward in a way that contributes to the achievement of the spatial strategy as well as delivering a scale and form of development that is appropriate to the local area.                 |
| 2  | Amenity Group/ Residents Association | Blackheath Society | The Sites - Kidbrooke |          | Para 4.34, Figure 4.1 (Land safeguarded for transport uses) indicates that there is a need for improvements to the transport infrastructure to better link the Kidbrooke area with the transport interchange at North Greenwich. We fully support this given that there will be, through the approval of planning applications 14/2607/F, 14/2611/F and 14/2554/O in March 2015, a greater number of units in the Kidbrooke Intensification Area than was envisaged at the time the Core Strategy was adopted. We also believe that the need for improvements to the road network southwards from the Kidbrooke Village Centre to Eltham and the more southerly parts of the borough should not be overlooked. | Support noted. Improvements to the wider road network from Kidbrooke to Eltham are beyond the scope of the Site Allocations.   |
| 2  | Amenity Group/ Residents Association | Blackheath Society | The Sites - Kidbrooke | K1       | Para 4.7: We note that two sites within the Kidbrooke area have been identified as having the potential for town centre use - K1 (Kidbrooke Station Area) and K5 (Phase 3, Kidbrooke Village Centre). While welcoming the allocation, we question whether the K1 site is suitable for such use. The site is isolated from the K5 site by the railway line and unless there are some firm proposals for improving access between the two for both vehicular traffic and pedestrian movement, we are not convinced that the K1 site for additional shopping uses will be successful.   | In addition to shopping, town centre uses can include a range of employment, service, leisure and community uses. The draft allocation will provide further detail on the type of uses considered generally appropriate to K1 to ensure that the non-residential uses in this location complement the retail uses to the south of the railway in the village centre. |
| 2  | Amenity                              | Blackheath         | The Sites -           |          | Table 5.7: The schedules of the Kidbrooke sites set out on pages   | The Infrastructure Delivery Plan is being  |

| ID | Type of organisation                 | Name  | Section          | Site Ref | Summary of comments   | RBG response   |
|----|--------------------------------------|---|------------------|----------|---|--|
|    | Group/ Residents Association         | Society   | Kidbrooke        |          | 94 and 95 are a welcome summary of our understanding of the development potential for the Kidbrooke Development Area overall. As we understand matters, and as noted above in our comments on Para 4.2, we note that, from the example set by Berkeley Homes in the sites in their ownership, there is the potential for sites not in their ownership - such as K1 (Kidbrooke Station area - TfL), K2 (Huntsman site - private developer) and K6 (Former Thomas Tallis School - RBG) - there will be a potential for further intensification of housing development beyond that envisaged in the June 2008 Kidbrooke Development Area SPD and as currently recognised in the Core Strategy document. In this latter respect, we urge that, either in the current policy document or in a later associated policy document, updated figures are provided for approved developments, for those in the forward planning pipeline and, where available, forecasts even further ahead. | updated alongside the Site Allocations to ensure that providers are informed, insofar as possible, regarding the future development potential of the area and that appropriate on- and off-site mitigation measures are secured.   |
| 3  | Amenity Group/ Residents Association | Charlton Central Residents Association          | General comments |          | CCRA is likely to have views on the sites allocations (e.g. waste facility; school sites), but recognises that designations are at a very early stage and will be requesting a Workshop to provide further details and information.   | Noted  |
| 4  | Amenity Group/ Residents Association | Charlton Community Gardens Management Committee | General comments |          | Our chief concerns are to protect existing Open Space and to ensure additional Open Space is included in new developments, particularly Charlton Riverside which is currently an area of Open Space deficiency. Where there will be a managed release of employment land to create housing, we would expect an allocation of accessible Open Space that might go some way towards remedying the current deficiency. Our experience with Community Open Space provision suggests that merely having land designated as COS is no protection in the face of whatever may be the current priorities of the Council. Your documents acknowledge that Open Space is poorly distributed across the borough. Hence, the geographical distribution of Open Space should become a weighted factor in planning applications. For instance, insofar as Charlton has been identified as an area of open space deficiency, and given that the need for school places was the                   | An updated Green Infrastructure Study will inform the next version of the Site Allocations. Community Open Space and MOL designations will be considered as part of the Local Plan review. For large sites that justify the provision of new public open space, the site allocation will include requirements regarding the general form, function and scale of the open space, to a level of detail that is appropriate to a DPD. |

| ID | Type of organisation                   | Name   | Section             | Site Ref | Summary of comments  | RBG response   |
|----|--|--|---------------------|----------|--|--|
|    |  |  |                     |          | over-riding factor in the consideration of the development of the Highcombe Open Space, any subsequent planning application for the development of the upper Highcombe site bordering Charlton Road (where Our Lady of Grace school presently stands) should require creating a compensatory area of open space as was lost from the lower Highcombe site. Charlton Community Gardens would advocate that the whole of the top site become replacement Open Space.   |  |
| 4  | Amenity Group/ Residents Association   | Charlton Community Gardens Management Committee                        | General comments    |          | One of the key benefits of COS for health and well-being relates to the green lung it provides in heavily built-up areas. Appendix 2 Baseline Data of the Sustainability Appraisal Report specifies nine Air Quality Monitoring Sites across the borough. Why are these areas—Woolwich Road in particular—not prioritised for air quality improvement action? Why are we not collecting data on health outcomes for these postcode areas: how many new cases of asthma in children, how many diagnosed COPD conditions in older people, what proportion of deaths in various age brackets is attributable to respiratory conditions? To say that we have a borough-wide Air Quality Management Area is to suggest that the areas of high concentration can be buried in averaged out borough-wide figures. Similarly “life expectancy” is a result of a number of factors and gives only a broad brush sense of what is happening to whom. We will only know if policies and plans are working when we can see how they affect outcomes for residents. | Where appropriate, the next version of the Site Allocations will identify where mitigation measures are required in response to poor air quality, and also opportunities for new development to include measures that seek to improve air quality. |
| 5  | Agent representing business/ landowner | Cory Environmental Group including Riverside Resource Recovery Limited | The sites- Charlton | C1       | The allocation of site C1 for industrial use is in principle welcomed (see map below). It provides a degree of separation between the activities that take place at the Barge Yard and the proposed mixed use development identified for site C5.  | Noted. The Site Allocations will not alter SIL boundaries. Existing London and Local Plan policies provide sufficient guidance regarding development within SIL, and the site will not be included in the next version of the Site Allocations.    |
| 5  | Agent representing business/           | Cory Environmental Group   | The sites- Charlton | C5       | However, given the proximity of the Barge Yard to site C5, there remains a residual concern that the allocation site C5 could result in sensitive uses (residential and education) being situated in closer  | The next version of the Site Allocations will include the referenced requirements in relation to not prejudicing operation of the  |

| ID | Type of organisation                   | Name  | Section               | Site Ref | Summary of comments   | RBG response  |
|----|--|---|-----------------------|----------|---|---|
|    | landowner                              | including Riverside Resource Recovery Limited |                       |          | primary to the Barge Yard. We believe that site allocation C5 must include additional text under “Options for future use” which specifically identifies the specific locational issues that must be addressed and resolved. Early engagement with local operators and businesses should also be recommended.  | safeguarded wharves.  |
| 6  | Agent representing business/ landowner | Derreb Limited                                | The Sites - Kidbrooke | K2       | Site K2 is presently zoned for residential development. Derreb Limited wishes for the land to remain zoned for residential development.   | Support for residential use of site K2 noted.   |
| 7  | Agent representing business /landowner | Derreb Limited                                | The Sites - Kidbrooke | K2       | We note that the Core Strategy Map of Site Proposals records the Huntsman Site as falling within site H6 West Ferrier Precinct for housing and ancillary development. The Core Strategy’s - Site Proposals Schedules: Housing cross refers in the description to “... the pending Kidbrooke Area Development SPD and Policy H4 (Kidbrooke Development Area)”. This confirms the site is allocated for housing. In the draft Site Allocations Local Plan Issues and Options Paper the Huntsman Site is referred to under Site K2. The site is incorrect in that the size is 2.02 hectares. The “options for future use” are housing. The reference to affordable housing is not relevant as no other site within the Kidbrooke sites has an affordable housing reference. The demand for affordable housing is across the entire Kidbrooke Area. The reference under the Huntsman site suggests the demand for affordable housing is greater on this site than for other sites which is incorrect. The planning history under the “Brief Description of Site” should be deleted as it is not relevant. The London Plan was updated on 16 March 2016 and does not set any percentage for the delivery of affordable housing from any particular site. It requires the use of financial viability assessments to determine the amount that can be provided. This is supported by the National Planning Policy Framework. The Core Strategy seeks at least 35% affordable housing subject to viability and therefore there is no policy basis to support a requirement for 50% affordable housing from the Huntsman site. The Kidbrooke Development Area SPD is out-of-date and little weight can be accorded to the affordable housing | Site area will be corrected in Preferred Approach. The site is a greenfield site, formerly used as a playing field and designated as Metropolitan Open Land until 2006. As set out in the Kidbrooke SPD, a minimum of 50% affordable housing should be provided on greenfield sites. Core Strategy Policy H3 Affordable Housing states that development of 10 or more homes will be expected to provide at least 35% affordable housing, and the supporting text clarifies that on sites with low existing use values up to 60% affordable housing may be deliverable. As a greenfield site, it is appropriate to identify in the site allocation that a higher proportion of affordable housing should be provided. Appeal decision APP/E5330/W/16/3145602 (16 November 2016) confirmed that the development plan would seek 50% affordable housing from this site, and that there is appropriate flexibility in the development plan regarding consideration of viability when determining applications that may propose a lower level of affordable housing than sought by applicable policies/guidance. |

| ID | Type of organisation        | Name                     | Section          | Site Ref | Summary of comments   | RBG response   |
|----|-----------------------------|--------------------------|------------------|----------|---|--|
|    |                             |                          |                  |          | objectives in the SPD.  |  |
| 8  | General Consultation Bodies | Education Funding Agency | General comments |          | The EFA welcomes the support given in paragraph 1.2 of the Issues and Options Paper to schools as necessary infrastructure required to deliver sustainable growth in Royal Greenwich set out in the Core Strategy. Significant growth in housing stock is expected in Royal Greenwich. This will place significant pressure on social infrastructure such as education facilities. The Local Plan must therefore ensure that sufficient land is allocated for school use to meet the needs of this significant growth with robust forecasts to identify the medium to long-term capacity requirements. The EFA therefore encourages local authorities to work closely with us during the early stages of planning policy development to help guide the development of new school infrastructure (as per paragraph 3.2.21 of the Core Strategy) and to meet the predicted demand for primary and secondary schools. The EFA also endorses your commitment to providing high quality education for all children to help them realise their full potential (paragraph 4.7.14). | The Infrastructure Delivery Plan is being updated alongside the Site Allocations to ensure that providers are informed, insofar as possible, regarding the future development potential of the area and that appropriate on- and off-site mitigation measures are secured. Providers will be engaged as part of this process. Where possible and appropriate, medium-long term capacity requirements for new education provision will be identified and sites allocated. |
| 8  | General Consultation Bodies | Education Funding Agency | General comments | W8       | It is also noted that Woolwich falls within the 'area of search' for new schools in the north of Royal Greenwich and that Site Ref: W8 – Former Public Baths, Bathway is identified for reuse for appropriate town centre activity including educational and other community uses. The 0.2ha site is unsuitable for conversion to a primary or secondary school. However, there is merit in exploring potential 'alternative provision' (AP) or 'special educational needs' (SEN) type uses for the site.   | As a small site of 0.20ha comprising a single locally listed building, it is considered that existing policies provide sufficient guidance should proposals be forthcoming.  |
| 8  | General Consultation Bodies | Education Funding Agency | General comments |          | Paragraphs 4.37- 4.39 of the Issues and Options Paper sets out the requirements for new schools over the next five years. The EFA welcomes RB Greenwich's approach to planning for new school places. Ensuring there is a good supply of sites for schools will ensure that RB Greenwich can swiftly and flexibly respond to existing and future need for school places to meet the needs of the Royal Borough for the plan period. The EFA supports the predicted education requirements up to 2019/20 for the identified sites/areas listed in this section, and would welcome the  | The Infrastructure Delivery Plan is being updated alongside the Site Allocations to ensure that providers are informed, insofar as possible, regarding the future development potential of the area and that appropriate on- and off-site mitigation measures are secured. Providers will be engaged as part of this process. Where possible and appropriate, medium-long term   |

| ID | Type of organisation                 | Name                     | Section                       | Site Ref | Summary of comments  | RBG response   |
|----|--------------------------------------|--------------------------|-------------------------------|----------|--|--|
|    |                                      |                          |                               |          | opportunity to investigate the feasibility of opening a free school(s) on these sites/in these areas.  | capacity requirements for new education provision will be identified and sites allocated.  |
| 8  | General Consultation Bodies          | Education Funding Agency | General comments              |          | The EFA also notes that there is need for some additional sites to be identified for schools, particularly in Eltham and in the wider Thamesmead area to the north of Greenwich. We would also welcome the opportunity to work closely with the Royal Borough to investigate opportunities for opening new free schools in these areas.          | The Infrastructure Delivery Plan is being updated alongside the Site Allocations to ensure that providers are informed, insofar as possible, regarding the future development potential of the area and that appropriate on- and off-site mitigation measures are secured. Providers will be engaged as part of this process. Where possible and appropriate, medium-long term capacity requirements for new education provision will be identified and sites allocated. |
| 8  | General Consultation Bodies          | Education Funding Agency | General comments              |          | You will have no doubt taken account on the key strategic policies in preparing the Issues and Options Paper, but it would be helpful if they were explicitly reference. In particular paragraph 72 of the NPPF, the Joint Policy Statement from the Secretaries of State for CLG and Educations, and policies 3.16 and 3.18 of the London Plan. | It is unnecessary to restate national and regional policy in the Local Plan.   |
| 9  | Amenity Group/ Residents Association | Eltham Society           | The sites- Eltham town centre | E4       | Residential is proposed for Site E4 but it is felt that Mecca bingo hall would be better for mixed use with community/cultural space, some residential and business units.   | The site is outside the boundary of Eltham Major Town Centre. Therefore solely residential use is appropriate for the site.  |
| 9  | Amenity Group/ Residents Association | Eltham Society           | The sites- Eltham town centre | E1       | Site E1 would offer a green route, but there is already a route south of the railway that connects to the east at New Eltham so not entirely convinced by the route across the golf course.  | Comments regarding existing route in proximity noted. The Royal Blackheath Golf Course is already designated as part of the Green Chain on the Policies Map. There are no current proposals that would enable a public route through the golf course, and therefore no evidence proposing revisions to Green Chain Walk on the Policies Map. The site will not be included in the next version of the Site Allocations.  |

| ID | Type of organisation                 | Name               | Section                          | Site Ref | Summary of comments  | RBG response  |
|----|--------------------------------------|--------------------|----------------------------------|----------|--|---|
| 9  | Amenity Group/ Residents Association | Eltham Society     | The sites- Eltham town centre    | E2       | Site E2 Some of this site is underused but also contains important off-street parking areas (for M&S and council-operated but not the Lidl car park) and the renovated/extended Orangery Studios. The parking is important for the viability of the High Street and M&S, in particular. Shopping and high streets are undergoing major changes largely due to online shopping and, therefore, nothing should be done that reduces the viability of those shops. The Orangery provides business units and importantly employment opportunities. We think this area should provide these uses to complement the shopping on the High Street. Orangery Lane is the only access to service major shops and other uses, which must be taken into account when designing any development in the area. Shopping and high streets are undergoing major changes largely due to online shopping and therefore nothing should be done that reduces the viability of those shops. Orangery Lane is the only access to service major shops and other uses, which must be taken into account when designing any development in the area. | The next version of the allocation will excluded The Orangery and the council-owned car park as there is not redevelopment potential associated with either of these sites/uses. The next version of the allocation will clarify how the redevelopment of the site can contribute to supporting the vitality and viability of the town centre, including by identifying suitable ground floor uses. |
| 9  | Amenity Group/ Residents Association | Eltham Society     | The sites- Eltham town centre    | E3       | Site E3 not sure whether the reservoir would be surplus if the number of residents increases in the area. If it surplus, there could be the possibility for an underground car park below open space/residential.  | Thames Water has confirmed that the reservoir is operational and they have no current plans to decommission. The site will not be included in the next version of the Site Allocations.   |
| 9  | Amenity Group/ Residents Association | Eltham Society     | The sites- Eltham town centre    | E5       | The access from Whitewoods (site E5) is right onto the junction, which works at present because there are very few movements in and out of the site. The proposed use of residential would increase this movement and it would extinguish a local business and the employment it provides.   | The next version of the site allocation will provide further detail on access arrangements, including that residential access should be from the rear of the site, and the appropriate mix of residential/business uses to be provided as part of any redevelopment proposals.  |
| 10 | Specific Consultation Body           | Environment Agency | The sites- Plumstead town centre | P3       | Add following text to site allocation: An historic well was drilled on the original public baths site. Confirmation should be sought by any developer that the well has been appropriately decommissioned to ensure there are no structural, health and safety or environmental risks presented.   | Requirement noted. P2 will not be taken forward in the next version of the Site Allocations; this will be included in the next version of allocation P3   |
| 10 | Specific                             | Environment        | The sites-                       | P2       | An historic well was drilled on the original public baths site.  | Requirement noted. P2 will not be taken   |

| ID | Type of organisation       | Name               | Section                          | Site Ref | Summary of comments  | RBG response   |
|----|----------------------------|--------------------|----------------------------------|----------|--|--|
|    | Consultation Body          | Agency             | Plumstead town centre            |          | Confirmation should be sought by any developer of T2 and/or T3 that the well has been appropriately decommissioned to ensure there are no structural, health and safety or environmental risks presented.  | forward in the next version of the Site Allocations; this will be included in the next version of allocation P3  |
| 10 | Specific Consultation Body | Environment Agency | General comments                 |          | Managing flood risk requires a sequential approach and new development should be directed towards the lowest flood risk areas wherever possible. This approach is to avoid, compensate and mitigate flood risk. We understand existing town centres and regeneration zones such as Greenwich and Woolwich town centres are located in high risk flood risk areas. The local plan process offers opportunities for the ongoing regeneration of these riverside areas to contribute towards managing flood risk through careful infrastructure and environmental capacity planning, resilient design, incorporating green infrastructure to improve the riverside habitats and corridors for people and wildlife. New and existing infrastructure across the borough such as bridges, roads, railways, tunnels and electricity sub stations should be carefully designed, located and maintained to remain safe and operational during a major flood event or drought. | The Core Strategy sets out the spatial strategy for the borough, based on the sequential approach. It also contains borough-wide policies applicable to all new developments that ensure flood risk is appropriately managed and mitigated, including in relation to essential infrastructure. |
| 10 | Specific Consultation Body | Environment Agency | The sites- Greenwich town centre | G5       | Must consider TE2100 Plan requirements. Consider improving public access to the Thames. Consider changing text to 'enhance' rather than 'not compromise' Deptford Creek ecology.   | Requirement noted. This site will not be taken forward in the next version of the Site Allocations.  |
| 10 | Specific Consultation Body | Environment Agency | The sites- Greenwich town centre | G7       | Must consider TE2100 Plan requirements. Consider improving public access to the Thames. Consider changing text to 'enhance' rather than 'not compromise' Deptford Creek ecology.   | Requirement and suggestion noted. This will be included in next version of the allocation.   |
| 10 | Specific Consultation Body | Environment Agency | The sites- Greenwich town centre | G2       | Must consider TE2100 Plan requirements. Consider maintaining consistency of ground levels alongside Deptford Creek.  | Requirement noted. This site will not be taken forward in the next version of the Site Allocations.  |
| 10 | Specific Consultation Body | Environment Agency | The sites- Woolwich              | W3       | River Thames and Thames Tidal Defences relevant to site. Add 'must consider TE2100 Plan requirements' to allocation.   | The next version of the site allocation will include reference to the TE2100 Plan requirements   |
| 10 | Specific Consultation Body | Environment Agency | The sites- Charlton              | C3       | Sensitive in terms of security for the operation of the Thames Barrier. We have requested this area be safeguarded for storage of equipment under the TE2100 Plan. Please note: We don't require this area be safeguarded for flood storage.   | Requirement noted. This site will not be taken forward in the next version of the Site Allocations.  |



| ID | Type of organisation       | Name               | Section                             | Site Ref | Summary of comments  | RBG response   |
|----|----------------------------|--------------------|-------------------------------------|----------|--|--|
| 10 | Specific Consultation Body | Environment Agency | The sites-Charlton                  | C4       | Sensitive in terms of security for the operation of the Thames Barrier. We have requested this area be safeguarded for storage of equipment under the TE2100 Plan. Please note: We don't require this area be safeguarded for flood storage.   | Requirement noted. This site will not be taken forward in the next version of the Site Allocations.  |
| 10 | Specific Consultation Body | Environment Agency | The sites-Woolwich                  | W15      | Suitable for open space.   | Open space designations are not proposed to be changed by the Site Allocations and as a result this site will not move forward to the next document. |
| 10 | Specific Consultation Body | Environment Agency | The sites-Thamesmead and Abbey Wood | T3       | T3, T5 and T6 are all within/peripheral to the footprint of the Tripcock hazardous waste landfill site. Though the site is nearing closure the nature of the wastes disposed here, and the containment systems that surround them, will inevitably restrict the range of uses that this land may be employed in the medium to long term. In particular the residential and associated amenity uses planned will need to account for the fact that the landfill will need to be accessible by the current site permit holder for many years to come to allow them to carry out the necessary aftercare and monitoring works to demonstrate the site is not a risk to the wider environment. | Requirement noted. This will be included in next version of the allocation.  |
| 10 | Specific Consultation Body | Environment Agency | The sites-Plumstead town centre     | P6       | The former electrical station site may reasonably be expected to be affected by heavy contamination from its historic use. Owing to the buildings historic status, couple with the site's proximity to the Crossrail works the logistical aspects for investigating the soil and groundwater conditions at the site may be challenging which will need to be considered by any developer taking this forward.  | The potential contamination of the site will be included in the next version of the allocation   |
| 10 | Specific Consultation Body | Environment Agency | The sites-Charlton                  | C5       | There is an Environment Agency groundwater level observation borehole present within this area. Developers need to correspond with Environment Agency at an early stage to preserve this important source of monitoring wherever possible.   | Requirement noted. This will be included in next version of the allocation.  |
| 10 | Specific Consultation Body | Environment Agency | The sites-Thamesmead and Abbey Wood | T1       | This site falls within the drawn footprint of an historic landfill site. Particular attention to this detail should be made when the site comes forward for development as there may be some potential information available from Crossrail investigation works in the area.   | This site is within Strategic Industrial Land and will not be taken forward in the next version of the Site Allocations.                             |
| 10 | Specific                   | Environment        | General                             |          | All developments adjacent to the flood defences should be  | The requirement to carry out a FRA that  |

| ID | Type of organisation       | Name               | Section             | Site Ref | Summary of comments   | RBG response  |
|----|----------------------------|--------------------|---------------------|----------|---|---|
|    | Consultation Body          | Agency             | comments            |          | supported with Flood Risk Assessments (FRAs) demonstrating how they have taken TE2100 plan and actions into account.  | demonstrates how the TE2100 plan and actions have been taken into account is set out in Core Strategy Policy E2 Flood Risk,   |
| 10 | Specific Consultation Body | Environment Agency | General comments    |          | All the proposed Site Allocations offer opportunities to improve surface water by incorporating Sustainable Drainage Systems. Development at these sites should be informed by the latest environmental good practice and deliver high standards of sustainable design and construction. All sites over 1 hectare should demonstrate how surface water will be managed in a Flood Risk Assessment in discussion with your drainage team as the Lead Local Flood Authority.  | Where appropriate, the next version of individual allocations will make reference to SUDs.  |
| 10 | Specific Consultation Body | Environment Agency | General comments    |          | Cost estimates - The approximate costs of maintaining and improving the flood defence system for Greenwich are as follows for the period to 2050: Flood defences - maintenance and repair: £12 million; Flood defences - major repairs and replacements: £60 million; Thames barrier - operation and maintenance (contribution): £20 million; Thames barrier - refurbishment and replacements (contribution): £7 million. Thus the overall cost of the flood defence system for Greenwich for the period to 2050 is about £100 million. The date 2050 was selected as it is before the major improvement to the flood defence system is likely to be carried out. The tidal flood defences in this area are covered by the 'Thames River (Prevention of Floods) Acts 1879 to 1962'. This places liability for maintenance and ultimate replacement of tidal flood defences on the Riparian Owner (freeholder of the land under or adjacent to the tidal defence). The council should be aware of these costs because contributions may be needed where the council is the Riparian owner, a Riparian Owner cannot be found, or the Riparian Owner is unable to finance works. | Where Site Allocations adjoin the Thames, the draft allocation will make reference to the need to engage with the EA regarding the maintenance, repair and replacement of relevant flood defences   |
| 10 | Specific Consultation Body | Environment Agency | The sites- Charlton |          | Due to the riverside location of the majority of the sites proposed in Charlton Riverside, coupled with the potential for historic contamination from the areas industrial heritage, it should be noted that the scope for infiltration drainage as a sustainable option for surface water drainage is limited. A high-level look at potential alternative options would therefore be desirable.  | The next version of the Site Allocations will note the limitation on surface water drainage options for sites in Charlton Riverside. The 2017 Charlton Riverside SPD considered how the area could be managed holistically in relation to water and its |

| ID | Type of organisation       | Name               | Section          | Site Ref | Summary of comments  | RBG response   |
|----|----------------------------|--------------------|------------------|----------|--|--|
|    |                            |                    |                  |          | Consider how any new residential land uses near our regulated sites can be carefully managed.  | recommendations will be included in the draft allocations, as appropriate to a DPD.  |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | Figure 2 below shows the flood defence line, where land should be safeguarded. REFER TO FIGURE - west of Peninsula shown as potential new or realigned flood defences  | The requirements for safeguarding will be incorporated into relevant allocations.  |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | <p>Given the scale of on-going regeneration in Greenwich, the level of flood risk and long River Thames frontage we recommend updating section 4.2 Key issues and options to include "Flood risk, climate change and environmental infrastructure" as a key issue. This could be combined with the "waste" and "green infrastructure" issues to deliver an integrated approach to managing these key environmental issues and opportunities. We support 4.29 to ensure riverside development protects and incorporates Thames Path. This could be extended to include new development also seeks opportunities for improving flood defences for example tidal terracing in line with the Thames Estuary (TE2100) Plan to deliver quality flood defences and an improved environment for people and wildlife. The Sustainability Appraisal should be updated to include the TE2100 plan and actions and Borough Factsheet.</p> <p><a href="https://www.gov.uk/government/collections/thames-estuary-2100">https://www.gov.uk/government/collections/thames-estuary-2100</a></p> | The next version of the Site Allocations will ensure that opportunities for the improvements mentioned are incorporated into all relevant allocations. The Sustainability Appraisal Scoping Report will be updated to include the TE2100 Plan. |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | <p>Please note that some of the proposed allocations may be impacted by recently published new increased climate change allowances for assessing flood risk, available at <a href="https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances">https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</a>. This may include new proposals in Greenwich town centre and Kidbrooke. The Environment Agency does not currently have flood extents mapped for these new allowances. However, as an indicator, work undertaken previously for the Lewisham and Catford flood alleviation scheme identified that there is a potential in more extreme flood incident scenarios for floodwater from the Ravensbourne to reach Greenwich town centre, flowing alongside Deptford Creek. It may be that the increased climate change allowances may result in similar circumstances. Consideration of the impact of the new climate</p>   | The SFRA (Level 1 and 2) has been updated to take account of updated climate change allowances and its conclusions will be reflected in the next version of the Site Allocations.  |

| ID | Type of organisation       | Name               | Section          | Site Ref | Summary of comments   | RBG response   |
|----|----------------------------|--------------------|------------------|----------|---|--|
|    |                            |                    |                  |          | change allowances will need to be undertaken within the update to your SFRA to inform the sustainability appraisal.   |  |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | Requirements for defences downriver of the Thames Barrier are: An ongoing programme of inspection, maintenance, repair and replacement of defences; Minor raising of some crest levels in about 2040 to achieve a level of 7.2 m AOD (Above Ordnance Datum); Raising of all defences in about 2070 if it is decided to improve the Thames Barrier rather than build a new barrier in Long Reach: The defence crest levels for the Thames Barrier and fixed defences in Greenwich policy unit would be raised by about 1.1 m; Defences in Thamesmead policy unit would be raised by about 0.5 m.   | Noted that a major improvement to tidal flood defences is outside the plan period, however reference to the likely requirements will be included in relevant Site Allocations to ensure that proposals do not prejudice the delivery of future improvements. |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | Requirements for defences upriver of the Thames Barrier are: An ongoing programme of inspection, maintenance, repair and replacement of defences; Raising of all defences by up to 0.5 m in 2065; Raising of all defences by up to 1.0m (total) in 2100. This allows for projected increases in sea level to 2135. This includes the lower reach of the River Ravensbourne (Deptford Creek) downstream of Deptford Creek weirs. Additional flood mitigation is likely to be needed further upstream on the River Ravensbourne in 2065 and 2100 for fluvial flows combined with higher tides. The actual dates of defence raising will depend on the rate of sea level rise. These dates may be revised when the TE2100 Plan is updated. | Noted that a major improvement to tidal flood defences is outside the plan period, however reference to the likely requirements will be included in relevant Site Allocations to ensure that proposals do not prejudice the delivery of future improvements. |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | Site Allocations and planning decisions should follow the sequential test and steer new development towards the areas of lowest flood risk where possible using the latest flood risk and climate change evidence.  | This is a requirement of the Core Strategy.  |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | TE2100 land requirements: It is important that requirements for safeguarding land are incorporated into strategic plans, in particular site allocation documents for Thames riverside development. The flood defences in Greenwich are generally 'hard defences' and include sheet pile walls and concrete or masonry structures. Most of the hard defences could be raised within the existing defence footprint (or with only a small increase in width) but the structures would be tall, unattractive and would restrict  | Site Allocations that adjoin the Thames will include an appropriate width of safeguarded land for future flood risk management interventions as advised by the EA.   |

| ID | Type of organisation       | Name               | Section          | Site Ref | Summary of comments  | RBG response   |
|----|----------------------------|--------------------|------------------|----------|--|--|
|    |                            |                    |                  |          | public access and views of the estuary. Additional space will be needed when the defences are raised both for the defence engineering works and also for other enhancements such as suitable public access. Land is also required for maintaining, replacing and improving the flood defences along the River Thames. Corridors of land along the existing defence lines should be safeguarded. This should include space for vehicle access for maintenance and repair of the defences. We suggest that the width of land that should be safeguarded for future flood risk management interventions on the Thames could be of the order of 10 - 16 metres. More space may be required especially if wider enhancements are to be achieved. Site Allocations should ensure development does not “encroach” into the River Thames or result in loss of riverside space. However this will depend on the particular site, the defence type and proposed riverside improvements, and should be discussed and agreed with the Environment Agency.  |  |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | <p>The local plan process can be used to identify potential areas for "making space for water" and how riverside areas could be adapted for rising tides and reduced use of the Thames Barrier in line with the TE2100 plan actions. Maybe these improvements to riverside areas could be integrated with improvements to the riverside and Thames path and funded using Community Infrastructure Levy 123 list for "Strategic parks and open spaces projects. For more information on restoring lost flood plains and delivering set back flood defences and tidal terracing refer to the Estuary Edges guidance below. We recommend including this link in the</p> <p>Section:<br/> <a href="http://www.ecrr.org/Portals/27/Publications/Estuary%20Edges%20-%20design%20advice.pdf">http://www.ecrr.org/Portals/27/Publications/Estuary%20Edges%20-%20design%20advice.pdf</a> <a href="http://thames-landscape-strategy.org.uk/wp-content/uploads/2014/02/Restoration-of-the-Lost-Floodplain-final-document.pdf">http://thames-landscape-strategy.org.uk/wp-content/uploads/2014/02/Restoration-of-the-Lost-Floodplain-final-document.pdf</a> An example of tidal terracing and set back flood defences is shown below on Greenwich Peninsula. This is an example of good practice and ongoing</p> | The requirement for new or realigned defences will be incorporated into relevant allocations, as appropriate to a DPD. The use of CIL funding is outside the scope of the Site Allocations document. |

| ID | Type of organisation       | Name               | Section          | Site Ref | Summary of comments  | RBG response  |
|----|----------------------------|--------------------|------------------|----------|--|---|
|    |                            |                    |                  |          | regeneration of Greenwich Peninsula should retain and enhance these features and incorporate new sections of tidal terracing as regeneration continues along the River Thames frontage.  |   |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | <p>The proposed Site Allocations include sites adjacent to the River Thames and other wetland features. As sites are taken forward for adoption we would like to see a clear assessment of existing ecological value of sites before confirming their acceptance for redevelopment, and an aim for how sites will positively contribute to biodiversity including enhancement of watercourses where they exist on site. In this way the Strategic Environmental Assessment will be able to confidently predict that the Site Allocations will safeguard existing biodiversity and achieve net gains through the planning process. In particular where development is allocated next to the River Thames we would like to see allocations that specifically describe ecological improvements that are desirable to achieve and must be completed as part of any development. Examples of river restoration projects include Chinbrook Meadows and Ladywell Fields in the London Borough of Lewisham. For more information on the schemes see the links below:<br/> <a href="http://www.lewisham.gov.uk/inmyarea/openspaces/parks/Pages/chinbrook-meadows.aspx">http://www.lewisham.gov.uk/inmyarea/openspaces/parks/Pages/chinbrook-meadows.aspx</a><br/> <a href="http://www.lewisham.gov.uk/inmyarea/openspaces/parks/Pages/ladywell-fields.aspx">http://www.lewisham.gov.uk/inmyarea/openspaces/parks/Pages/ladywell-fields.aspx</a></p> | Core Strategy Policy OS4 sets out the objective to protect, restore and enhance the borough's biodiversity. The next version of Site Allocations will set out specific ecological improvements that should be achieved by proposals for relevant sites adjacent to the Thames and other wetland features.   |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | <p>The proposed Site Allocations should also be assessed as part of your Sequential Test process using latest flood risk evidence and data from your updated Strategic Flood Risk Assessment to steer development to the lowest risk flood zones. We encourage early pre application discussions to ensure development proposals do not increase flood risk and the site design and layout is informed by the latest flood risk data and climate change allowances. All the existing site allocation should also be assessed for any changes to flood zones or impacts of climate change.</p>  | <p>The Core Strategy sets out the spatial strategy for the borough, based on the sequential approach. It also contains borough-wide policies applicable to all new developments that ensure flood risk is appropriately managed and mitigated, including in relation to essential infrastructure. An updated SFRA has been prepared to take account of updated climate change projections and breach modelling. This includes a Level 2 SFRA s land outside flood risk areas cannot accommodate the</p> |

| ID | Type of organisation       | Name               | Section          | Site Ref | Summary of comments  | RBG response   |
|----|----------------------------|--------------------|------------------|----------|--|--|
|    |                            |                    |                  |          |  | necessary development and therefore the Exception Test needs to be applied to the Site Allocations.  |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | The SFRA / local plan should also encourage communities to prepare for flooding, for example through producing Flood Plans and signing up for flood warning to be prepared and ready for major flooding events.<br><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/292939/LIT_5286_b9_ff43.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/292939/LIT_5286_b9_ff43.pdf</a>   | This is outside the scope of the Site Allocations  |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | The site allocation review offers an excellent opportunity to plan for environmental improvement, improve the Thames Path, river corridors and tidal flood defences across Greenwich.  | The next version of the Site Allocations will ensure that opportunities for the improvements mentioned are incorporated into all relevant allocations. |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | The TE2100 Plan includes a major upgrade of the Thames Barrier later in the 21st century (or a new barrier at Long Reach). This major upgrade will require land for construction purposes and raising of the defences downriver. The existing open land adjacent to the Thames Barrier compound should therefore be safeguarded in case it is needed for this purpose.   | Core Strategy Policy E2 requires that development safeguards existing tidal and fluvial flood defences.  |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | The tidal flood defences in Greenwich include: The Thames Barrier and the fixed defences on the Thames downriver of the barrier; Fixed defences upriver of the barrier on the Thames and Deptford Creek; The downriver defence crest levels are about 2 metres higher than the upriver defences. The TE2100 Plan requirements for the flood defences are to maintain and improve the existing system until about 2050 to 2070, when a major improvement to the system will be needed. This will either include a major upgrade of the Thames Barrier or a new barrier in Long Reach, about 16 km downstream. | Noted that a major improvement to tidal flood defences is outside the plan period.   |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | There are a number of drainage outfalls into the Thames and Deptford Creek including large outfalls for the Marsh Dykes drainage system and Thames Water outfalls at Charlton and Deptford. As the sea level rises and storm rainfall increases, drainage of the floodplains will become more difficult. Improvements to some of the drainage outfalls are therefore likely  | Noted that improvements to some drainage outfalls are likely to be needed as sea level rises and storm rainfall increases.                             |

| ID | Type of organisation       | Name               | Section          | Site Ref | Summary of comments  | RBG response  |
|----|----------------------------|--------------------|------------------|----------|--|---|
|    |                            |                    |                  |          | to be needed.  |   |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | There is scope in the Greenwich council area for local flood defence realignments to achieve landscape, development, public amenity and environmental enhancements. There is also scope for some new local defences. Where realignments of the existing defences or new defences are envisaged, land will be required including an allowance for future defence raising. Specific areas where new or realigned defences might be considered include the following: Defence realignment as part of the redevelopment of Greenwich Peninsula West; High level access route to the Thames Barrier; Land for secondary defences at vulnerable locations, for example tunnel entrances and critical infrastructure; Land for enhancing the local drainage systems including space for potential flood storage areas.  | The requirement for new or realigned defences will be incorporated into relevant allocations.   |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | We recommend keeping your Strategic Flood Risk Assessment (SFRA) up to date and referring to any reports and lessons learned from the recent flooding across Yorkshire, Cumbria and Lancashire. National climate change allowances have been revised so your SFRA should be reviewed to incorporate this latest evidence. The Flood risk climate change allowances have been revised to reflect the latest climate projections in UKCP09 and wider flood risk research published since 2009. Land use planning decisions should be based on the latest and most accurate climate change data and evidence.<br><a href="https://www.gov.uk/government/publications/flood-and-coastal-risk-guidance-climate-change-allowances">https://www.gov.uk/government/publications/flood-and-coastal-risk-guidance-climate-change-allowances</a> Please also refer to the attached TE2100 briefing for Greenwich showing the following key issues and opportunities for your borough. | The SFRA (Level 1 and 2) is being updated to take account of updated climate change allowances and its conclusions will be reflected in the next version of the Site Allocations. |
| 10 | Specific Consultation Body | Environment Agency | General comments |          | We recommend you assess the proposed Site Allocations against Flood Zones and proximity to rivers and flood defences using the following criteria. Flood Zone 1: Lowest risk, no rivers or flood defences on site or adjacent. Flood Zone 2: Medium risk, rivers/flood defence near to the site. Flood Zone 3: High risk, river/flood defences on site/adjacent.   | The SFRA (Level 1 and 2) is being updated to take account of updated climate change allowances and its conclusions will be reflected in the next version of the Site Allocations. |
| 10 | Specific                   | Environment        | The sites-       |          | We would like to work with you on your regeneration plans for  | The Core Strategy and the South East  |



| ID | Type of organisation                   | Name                                      | Section          | Site Ref | Summary of comments  | RBG response   |
|----|--|---|------------------|----------|--|--|
|    | Consultation Body                      | Agency                                    | Charlton         |          | Charlton Riverside, in particular, to discuss ways you can carefully manage any new residential land uses near our regulated sites. As a waste regulator we wish to: Ensure construction site waste from the cluster is going to legitimate sources; Work closely with you on waste policy specifically for energy from waste installations. We want to encourage new development to maximise the use of district heat networks and link in some of the sites we regulate; Continue to support operators in the use of the River Thames for transporting waste; Continue to work with RBG and developers to improve and extend the Thames Path which passes through some of our regulated sites.   | London Joint Waste Technical Paper set out the borough's approach to waste management and district heat networks. Where a site allocation is located in an area that has the potential to establish and/or link to a district heat network this will be reflected in the draft allocation.   |
| 10 | Specific Consultation Body             | Environment Agency                        | General comments |          | When assessing potential traveller sites the council should be mindful of the highly vulnerable nature of this use to flooding identified within the supporting technical guidance to the National Planning Policy Framework.  | The Royal Borough conducted a Gypsy and Traveller Accommodation Assessment in July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to deliver any new transit provision at this time.                  |
| 11 | Agent representing business/ landowner | Fairview New Homes c/o Vincent and Goring | General comments |          | In assessing the Site Allocations document, Fairview are of the opinion that the approach taken to the document is fundamentally flawed and therefore unsound. In summary, Fairview's objection to this Site Allocation document can be summarised as follows: The document is not positively prepared, as it lacks supporting evidence that would provide a basis for a clear strategy designed to meet objectively assessment housing needs. The document fails to undertake any meaningful site assessments to justify the proposed allocations. There has been no review of the merits of former UDP Site Allocations, assessing changes in circumstance or prospects of delivery. The stated housing figure fails to acknowledge the additional 20% buffer required and accepted as | The purpose of the Issues and Options consultation was to seek early views on what sites should be included in the Site Allocations Local Plan, in line with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Site Allocations Local Plan complements the Core Strategy with Detailed Policies (adopted July 2014) which sets the overarching vision for the Royal Borough as well as guiding decisions on planning applications. The next stage of |

| ID | Type of organisation                   | Name                                       | Section          | Site Ref | Summary of comments  | RBG response   |
|----|--|--|------------------|----------|--|--|
|    |  |  |                  |          | necessary by the Borough elsewhere as a result of previous persistent under-delivery of housing. The allocated sites lack any information regarding the deliverable quantum of development, such that there is a lack of evidence that demonstrates that this DPD would meet the objectively assessed needs of the Borough, thus being contrary to the NPPF.   | consultation, the Preferred Approach document, will be the second document in the preparation of the Site Allocations Local Plan and, similar to the Issues and Options consultation, will be carried out in accordance with Regulation 18 of the Regulations. The Preferred Approach document will include further detail on the proposed allocations, and will set out the criteria against which all sites considered for inclusion in the document were assessed. The Site Allocations Local Plan is not an exhaustive list of every potential development site in the borough. Only those sites that are considered central to delivering the objectives and policies of the Core Strategy, and likely to come forward during the lifetime of the Local Plan, are included. |
| 11 | Agent representing business /landowner | Fairview New Homes c/o Vincent and Gorbing | General comments |          | Again it is noted that there is an intention to review the Infrastructure Delivery Study as part of the Site Allocations Local Plan, in this instance, that work has not yet commenced. Given the significant uplift in housing delivery requirements, as a result of the London Plan and the 20% buffer, the need for more schools, health centres and other community facilities will only increase. To make broad assumptions without undertaking the review prior to the production of the issues and options document only highlights again the prematurity of this document. If the Site Allocations were to proceed any further without the necessary reviews being undertaken, Fairview believe that it would only serve to deliver an unsound document, as there could be no evidence to demonstrate that the Plan provided for the objectively assessment need in the most appropriate manner. | The Infrastructure Delivery Plan is being updated alongside the Site Allocations to ensure that providers are informed, insofar as possible, regarding the future development potential of the area and that appropriate on- and off-site mitigation measures are secured.   |
| 11 | Agent representing                     | Fairview New Homes                         | General comments |          | Fairview consider paragraph 4.16 to be fundamentally flawed and demonstrates a clear failure to assess the merits of sites prior to  | Site G5 has been redeveloped and will not be included in the next version of the Site  |

| ID | Type of organisation                            | Name  | Section             | Site Ref | Summary of comments   | RBG response   |
|----|---|---|---------------------|----------|---|--|
|    | business/<br>landowner                          | c/o Vincent<br>and Gorbing                          |                     |          | <p>their inclusion within a Site Allocations issues and options document. Fairview's land at Site G5 is a prime example of the Council failing to appropriately review former UDP Site Allocations prior to their inclusion in this plan. This site in particular cannot be considered to be a locally significant employment site. It is agreed that it currently comprises warehouse style buildings; however, its long standing use has been by Booker Cash and Carry Ltd, which is a Sui Generis use, not an employment use, and currently employs only 6 FTE staff. How this can constitute a 'main employment site' is unknown, but its inclusion only serves to undermine the intention of this document. It is noted that the Employment Land Review 2012 identified a number of areas as being of employment value, however, Government legislation in the form of Prior Approval applications Offices to Residential, along with numerous planning permissions and re-developments have resulted in significant changes in environments since this report was undertaken and published. Site G5 is now surrounded by residential and hotel accommodation such that it is an isolated quasi-retail unit with an exceptionally low level of employment and in a dilapidated building. Without an appropriate, robust assessment of sites being undertaken, sites will be allocated or designated in an inconsistent manner, or allocations rolled forward without any real prospect of delivery. This approach fails to accord with the NPPF, paragraph 22. Fairview believe that the failure of the Council to consider changing circumstances, based on up-to-date evidence and appropriate site assessments, has resulted in a DPD which fails to adhere to national policy in relation to the protection of employment land, rendering the Plan unsound; this will undermine any allocations.</p> | Allocations.   |
| 11 | Agent<br>representing<br>business/<br>landowner | Fairview<br>New Homes<br>c/o Vincent<br>and Gorbing | General<br>comments | G5       | <p>Fairview consider that the options for the future use of Site G5 are not appropriate and are unsound. The site is clearly a residential redevelopment opportunity. When overlaying the residential and heritage constraints of the site, and having regard to potential ecological factors from the Deptford Creek, there is</p>   | Site G5 has been redeveloped and will not be included in the next version of the Site Allocations. |

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|----|--|--|------------------|----------|---|--|
|    |  |  |                  |          | <p>limited scope in planning terms for employment re-development of this site, let alone the intensification identified within the 'reasons for identification' section of the assessment. Moreover, Fairview are of the opinion that the site would not be economically viable to redevelop for employment uses. Applying the guidance of paragraph 22 of the NPPF as quoted above, this is a clear example of a site</p> <p>that should not be retained in its previous allocated use, as a direct result of the re-developments/conversions surrounding the site and the constraints resulting from those developments, which render the proposed allocation for employment use entirely unviable. Fairview are of the opinion that there is no future for this site in employment use and that redevelopment for residential purposes is the only solution. Residential development would be compatible with neighbouring uses could be readily accommodated given this and other constraints. The Site Allocations document should therefore be amended to show the land at no. 37 Greenwich High Road as allocate for residential purposes with a yield of circa.125 units. The site will therefore make a significant contribution to meeting housing requirements in the immediate 5-year period. Given the deficit in allocations, the site should be allocated for residential redevelopment.</p> |  |
| 11 | Agent representing business/ landowner | Fairview New Homes c/o Vincent and Gorbing | General comments |          | <p>Fairview note that the Council is again seeking to rely on substantially dated documentation in respect of an evidence base for this Site Allocations Local Plan. Paragraph 4.22 references the 2008 Retail Capacity Study and provides no indication that the Council intend to review this document to ensure allocations are based on up to date evidence. Since 2008 there has been a significant change in the function of Town Centres and retailing in general, this was seen in the 2011 Portas Review and the general presumption that we need to look at Town Centres and in particular High Street differently to maximise their efficiency and productivity. To rely on an evidently out of date document, that not only predominately pre-dates the recession, but also the NPPF and fundamental changes in planning legislation, only serves</p>   | <p>A number of new evidence base studies have been produced since consultation on the Issues and Options document, both by the Royal Borough and the Mayor of London (as part of the full review of the London Plan). These include the Gypsy and Traveller Accommodation Assessment (2016), the Towards a Greener Royal Greenwich – Green Infrastructure Study (2017), the London Strategic Housing Land Availability Assessment (SHLAA, 2017) and the Retail and Leisure Study (2018). All new evidence base studies produced since the Issues and</p> |

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|----|--|--|------------------|----------|--|--|
|    |  |  |                  |          | highlight the lack of justification there is for this Issues and Options document.   | Options consultation will inform the Preferred Approach document.  |
| 11 | Agent representing business/ landowner | Fairview New Homes c/o Vincent and Gorbing | General comments |          | Fairview therefore consider the document to be unsound based on the lack of justification or thorough assessment of each of the sites proposed, such that it cannot be evidenced that this is the most appropriate strategy for Site Allocations within Royal Greenwich. By virtue of a lack of robust site assessments, there is no mechanism to demonstrate that the sites are deliverable and that the strategy is therefore effective. Similarly, the lack of assessment results in a failure to review likely capacity of sites, to demonstrate that they meet objectively assessed need for housing. Overall, therefore, Fairview consider the Site Allocations Issues and Options document to be premature and unsound on all levels.   | The Preferred Approach document will include further detail on the proposed allocations, and will set out the criteria against which all sites considered for inclusion in the document were assessed. This includes all save UDP sites. The Site Allocations Local Plan is not an exhaustive list of every potential development site in the borough. Only those sites that are considered central to delivering the objectives and policies of the Core Strategy, and likely to come forward during the lifetime of the Local Plan, are included.  |
| 11 | Agent representing business/ landowner | Fairview New Homes c/o Vincent and Gorbing | General comments |          | Historically, Royal Greenwich has been consistent in its desire to add a 20% buffer to housing targets set out within both the Core Strategy and the London Plan 2015. This has been noted at para 31 of the Inspector's report, referenced above and in paragraph 1.5 of the Royal Borough of Greenwich Five Year Housing Supply Annual Assessment (1st April 2015). Even though the most recent (2013/14) completion rates were substantially below the average 2,685 net additional dwellings required per annum, and have been for a number of years, the Site Allocations document does not include a 20% buffer to the housing target. It is considered that the accepted (by both Royal Greenwich and the Core Strategy Inspector) persistent under delivery of housing, should be addressed via the Site Allocations Local Plan. This would ensure the necessary boost is given to the supply of housing sites. Based on the London Plan housing target for Greenwich of 2,685 dwellings per annum, plus a 20% buffer, resulting in a 3,222 annual target, the significant growth stated in paragraph 4.3 would equate to 41,886 dwellings between 2015-2028, or 45,108 for the entire plan period of 2014-2028 (minus the 2014/15 completions). Fairview consider that the failure to address the appropriate | The purpose of the Issues and Options consultation was to seek early views on what sites should be included in the Site Allocations Local Plan, in line with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Site Allocations Local Plan complements the Core Strategy with Detailed Policies (adopted July 2014) which sets the overarching vision for the Royal Borough as well as guiding decisions on planning applications. The next stage of consultation, the Preferred Approach document, will be the second document in the preparation of the Site Allocations Local Plan and, similar to the Issues and Options consultation, will be carried out in accordance with Regulation 18 of the Regulations. The Preferred Approach document will include further detail on the |

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|----|--|--|------------------|----------|--|---|
|    |  |  |                  |          | identified need and comply (in a consistent manner) with paragraph 47 of the NPPF, will result in an under-provision of housing Site Allocations.<br>This will render the Site Allocations Local Plan unsound.   | proposed allocations, and will set out the criteria against which all sites considered for inclusion in the document were assessed. The Site Allocations Local Plan is not an exhaustive list of every potential development site in the borough. Only those sites that are considered central to delivering the objectives and policies of the Core Strategy, and likely to come forward during the lifetime of the Local Plan, are included.  |
| 11 | Agent representing business/ landowner | Fairview New Homes c/o Vincent and Gorbing | General comments |          | However, there is no evidence of any of the Core Strategy evidence base being reviewed to inform the Site Allocations document. Fairview are therefore of the opinion that this document is premature pending this evidence base and in particular fails to be informed by an up-dated analysis of objectively assessed housing need. Accordingly, Fairview consider that the document cannot be deemed to be positively prepared, as it is not based on any identified strategy supported by an evidence base. Importantly, sites have been identified prior to undertaking a comprehensive 'Call for Sites' exercise, which would then serve to inform a Strategic Housing Land Availability Assessment (SHLAA). This would in turn enable a robust assessment of site suitability based on the NPPF 'available, achievable and deliverable' criteria. | A number of new evidence base studies have been produced since consultation on the Issues and Options document, both by the Royal Borough and the Mayor of London (as part of the full review of the London Plan). These include the Gypsy and Traveller Accommodation Assessment (2016), the Towards a Greener Royal Greenwich – Green Infrastructure Study (2017), the London Strategic Housing Land Availability Assessment (SHLAA, 2017) and the Retail and Leisure Study (2018). All new evidence base studies produced since the Issues and Options consultation will inform the Preferred Approach document. |
| 11 | Agent representing business/ landowner | Fairview New Homes c/o Vincent and Gorbing | General comments |          | Paragraph 4.5 makes a broad statement regarding the opportunity to consolidate employment land within the Borough and release areas for housing, but the brief site assessments included fail to consider this issue when reviewing a sites potential. Paragraph 4.9 states 'it should also be remembered that the sites identified are not the only sites in Royal Greenwich where we would expect to see residential development; they are those that are considered to be of strategic importance, or where there is a proposed change of land use, or where a site specific policy would help to facilitate  | The purpose of the Issues and Options consultation was to seek early views on what sites should be included in the Site Allocations Local Plan, in line with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Site Allocations Local Plan complements the Core Strategy with Detailed Policies (adopted July 2014) which   |

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|----|--|---|------------------|----------|---|---|
|    |  |   |                  |          | delivery of the site with infrastructure considered necessary for sustainable development.' Fairview consider this statement to be misleading; there are few other options available. It gives the perception that there are many other potential development sites that would be excluded for a variety of reasons, however, the included sites are fairly exhaustive, it is Fairview's opinion that this statement only seeks to hide the Site Allocations documents failure to address the objectively assessed housing need, plus the evident persistent under-delivery buffer. In general terms the brief assessments of sites fail to review potential deliverability or site capacity, whilst many sites are already under construction. The inclusion of the latter only serves to disguise the actual sites that may be realistically available and conflicts with the approach taken to former UDP sites, where those completed or under construction have been excluded. | sets the overarching vision for the Royal Borough as well as guiding decisions on planning applications. The next stage of consultation, the Preferred Approach document, will be the second document in the preparation of the Site Allocations Local Plan and, similar to the Issues and Options consultation, will be carried out in accordance with Regulation 18 of the Regulations. The Preferred Approach document will include further detail on the proposed allocations, and will set out the criteria against which all sites considered for inclusion in the document were assessed. The Site Allocations Local Plan is not an exhaustive list of every potential development site in the borough. Only those sites that are considered central to delivering the objectives and policies of the Core Strategy, and likely to come forward during the lifetime of the Local Plan, are included. |
| 11 | Agent representing business/ landowner | Fairview New Homes c/o Vincent and Goring | General comments |          | The production of this consultation document follows the adoption of the Core Strategy in 2014 and the associated Inspector's report. The Inspector commented on the matter of soundness (paragraph 9 report dated 13th May 2014) and stated 'It [the Core Strategy] will be supplemented and supported by a Site Allocations Local Plan. The process of preparing that Local Plan will allow Royal Greenwich to update certain studies, for example in relation to open space, and undertake an assessment of the need for sites for Gypsies and Travellers.' The Inspectors report proceeds to state (para 22) 'Royal Greenwich confirmed that land currently designated as MOL will be reviewed as part of the Local Plan process when the Site Allocations Local Plan is prepared.' On housing delivery he stated that (para 31) 'Furthermore, Royal  | A number of new evidence base studies have been produced since consultation on the Issues and Options document, both by the Royal Borough and the Mayor of London (as part of the full review of the London Plan). These include the Gypsy and Traveller Accommodation Assessment (2016), the Towards a Greener Royal Greenwich – Green Infrastructure Study (2017), the London Strategic Housing Land Availability Assessment (SHLAA, 2017) and the Retail and Leisure Study (2018). All new evidence base studies produced since the Issues and   |

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|    |  |  |                  |          | Greenwich has stated that a 20% buffer to cope with underachievement and to ensure housing choice and competition could be accommodated in the first 5 years of the Plan' These two extracts from the Inspectors Report highlight the reliance on the Site Allocations Local Plan to justify out-of-date or lacking supporting evidence at the Core Strategy EiP, with a commitment clearly made to undertake a review or production of this evidence base to fully inform the production of the Site Allocations Local Plan.  | Options consultation will inform the Preferred Approach document.   |
| 11 | Agent representing business/ landowner | Fairview New Homes c/o Vincent and Gorbing | General comments |          | This is further compounded when a review of the former UDP allocations is undertaken. Whilst paragraph 1.12 indicates that the former UDP sites have been reviewed as part of the preparation of the Site Allocations Local Plan, with the exception of assessing whether the site has been delivered/is being delivered, or is now used for another significant purpose thus resulting in the sites' exclusion, there has been no review of changes to their land use context, or their ability to be delivered for their historic UDP allocation. Had a proper assessment of sites been undertaken prior to the formulation of this Site Allocations document, many of the UDP sites would potentially have been amended, either for alternative end uses or excluded due to lack of deliverability. | The Preferred Approach document will include further detail on the proposed allocations, and will set out the criteria against which all sites considered for inclusion in the document were assessed. This includes all save UDP sites. The Site Allocations Local Plan is not an exhaustive list of every potential development site in the borough. Only those sites that are considered central to delivering the objectives and policies of the Core Strategy, and likely to come forward during the lifetime of the Local Plan, are included. |
| 11 | Agent representing business/ landowner | Fairview New Homes c/o Vincent and Gorbing | General comments |          | This section further emphasises the prematurity of this issues and options consultation document. There is evidently Assessment work being undertaken simultaneously that should be informing this document, not being applied retrospectively. A Site Allocations Local Plan cannot be positively prepared if it is not informed by the essential documentation from the outset. Moreover it cannot be demonstrated that this is the most appropriate strategy for the Borough, without the initial evidence base.  | A number of new evidence base studies have been produced since consultation on the Issues and Options document, both by the Royal Borough and the Mayor of London (as part of the full review of the London Plan). These include the Gypsy and Traveller Accommodation Assessment (2016), the Towards a Greener Royal Greenwich – Green Infrastructure Study (2017), the London Strategic Housing Land Availability Assessment (SHLAA, 2017) and the Retail and Leisure Study (2018). All new evidence base studies produced since the Issues and   |



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|    |  |  |                     |          |   | Options consultation will inform the Preferred Approach document.   |
| 11 | Agent representing business/ landowner | Fairview New Homes c/o Vincent and Gorbing | General comments    |          | Whilst it is noted that a number of sites were assessed as part of the GLA SHLAA, used in support of the London Plan 2015, this only extended to circa 31 sites, most of which were strategic in nature and referred to within the Core Strategy and/or separate masterplans and many not seemingly referred to within this Site Allocations document. This lack of reference to strategic sites may be as a result of alternative site names/descriptions being used; if this is the case it adds a layer of confusion to the Development Plan and an unnecessary inconsistency. The failure to undertake any SHLAA or any other meaningful assessment of sites based on their proposed use allocation, results in a distinct lack of justification for any of the sites included within the document.   | A number of new evidence base studies have been produced since consultation on the Issues and Options document, both by the Royal Borough and the Mayor of London (as part of the full review of the London Plan). These include the Gypsy and Traveller Accommodation Assessment (2016), the Towards a Greener Royal Greenwich – Green Infrastructure Study (2017), the London Strategic Housing Land Availability Assessment (SHLAA, 2017) and the Retail and Leisure Study (2018). All new evidence base studies produced since the Issues and Options consultation will inform the Preferred Approach document. |
| 12 | Agent representing business/ landowner | Galliard Homes and U+I Group c/o NLP       | The sites- Charlton | C7       | All of the above is without taking account of London Plan Policy 3.3 which requires local planning authorities to consider taking opportunities to “achieve further housing supply above those target levels” and particularly through brownfield regeneration, in opportunity areas and through mixed use development. This part of the Westminster Industrial Estate is brownfield land lying within the Opportunity area and can more efficiently deliver housing through mixed-use development as sought through this overarching Policy requirement. Directly related to the delivery of housing, it is important to consider the specifics of the Westminster Industrial Estate. Given that it is in sole freehold ownership, accessible, available, deliverable and developable. Within a supportive and commercially viable planning framework, this site can be delivered within a significantly shorter time frame than much of the Charlton Riverside Area. It is self-contained, does not rely on other land or sites and was excluded from a wide SIL allocation for a more appropriate mixed use development by the Planning Inspectorate. This Site offers the opportunity to be | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use.                 |

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|    |  |                                      |                     |          | the catalyst that kick starts the regeneration of Charlton Riverside in the short to medium term providing additional emphasis (and time) for other sites to follow.   |  |
| 12 | Agent representing business/ landowner | Galliard Homes and U+I Group c/o NLP | The sites- Charlton | C7       | Finally, we note that the red line boundary for the site contained within the Site Allocations document is incorrect. The site specific map (pg. 47) does not accord with the larger map (pg 40). We attach a red line boundary which, in our clients' opinion, properly defines the boundary and identifies the site area to be 4.1 acres or 1.7 ha.  | The site boundary will be clarified in the next version of the allocation.   |
| 12 | Agent representing business/ landowner | Galliard Homes and U+I Group c/o NLP | The sites- Charlton | C5       | In addition, we note that the wider allocation envisages development to the east of the area to be dependent on improvements to flood management on other sites. We would urge caution in linking the regeneration of Charlton Riverside Central to sites C3 and C4 as these are in the ownership of others and it is possible that this could be a hindrance to redevelopment. It is accepted that there will be a requirement for flood risk management in areas of Charlton Riverside and that appropriate works would need to be undertaken – however it is not necessary to link this work to other sites at this stage as the level of mitigation will depend on the specific proposals. | The SFRA (Level 1 and 2) is being updated to take account of updated climate change allowances and its conclusions will be reflected in the next version of the Site Allocations. The EA have confirmed that this area is sensitive in terms of security for the operation of the Thames Barrier, and have requested that part of this area be safeguarded for storage of equipment under the TE2100 Plan. The next version of the allocation for Charlton Riverside Central will clarify how the new development should relate to Barrier Park and that the operational requirements of the Thames Barrier, as well as any site specific flood mitigation and management measures that are required across the site as a whole and in specific locations, if appropriate. |
| 12 | Agent representing business/ landowner | Galliard Homes and U+I Group c/o NLP | The sites- Charlton | C7       | In planning policy terms, it is also critically important to consider the wider implications of not allocating any residential use within the Westminster Industrial Estate site. The land sits within the London Plan Opportunity Area designation. As a result, it lies within the RB Greenwich's Core Strategy Strategic Development Location (SDL) of Charlton Riverside to provide a framework for intensive regeneration and delivery of new homes and new jobs. The Core Strategy considers the Charlton Riverside area capable   | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key  |

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|    |  |                                      |                     |          | <p>of delivering between 3,500 to 5,000 dwellings during the Plan period through the creation of a new mixed use urban quarter. The Core Strategy states that 70% of the projected housing delivery in Charlton would come forward during the plan period (up to 2027/28), amounting to 3,282 dwellings, with a further 30% to follow afterwards – suggesting an anticipated total requirement of circa 4,700 units. The Charlton Riverside Opportunity Area, according to the London Plan, extends to over 176ha and that Greenwich’s masterplan (2012) outlined the approach to delivering development across the area. The now-dated Masterplan approach is one of mixed use, walkable neighbourhoods with residents having access to work, retail, leisure and key services all in their immediate environment. It seeks residential neighbourhoods that provide quality family units, including low density Georgian housing typologies. The Sites initial allocation and that of the eastern part of the Masterplan, was considered suitable for creative industries and residential uses, thereby assisting the Core Strategy to meet the RBG target for housing delivery. Whilst the 176ha area was not considered suitable for housing in its entirety, large areas were so identified, particularly within a mixed use context.</p> | <p>contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use.</p>   |
| 12 | Agent representing business/ landowner | Galliard Homes and U+I Group c/o NLP | The sites- Charlton | C7       | <p>In summation, the proposed site allocation for business and creative industries alone is not a commercially viable option within Westminster Industrial Estate (‘the Site’). Whilst our clients understand and support the desire to promote creative uses in Charlton Riverside, including the Site, early cost-v-return analysis shows that it is not possible to refurbish the existing buildings (to a shell &amp; core finish) to provide employment and meet the necessary commercial returns to entice the applicant to pursue this option. To ensure the long term success of any creative / employment workspace within the site, it will need to be subsidised by other forms of development. As originally proposed within the 2012 Masterplan, the Site needs to deliver a mix of uses, including residential use, to provide any incentive for restoration and/or redevelopment. This issue is not specific to our particular clients. Was the Site to be considered by any developer, the cost analysis</p>  | <p>The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use.</p> |

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|    |  |                                      |                     |          | is clear that it would not be a viable proposition to promote wholly creative industries and employment generating uses within the existing floorspace. Therefore there is a risk that the currently Issues and Options allocations could render the Site vacant for the distant future.  |   |
| 12 | Agent representing business/ landowner | Galliard Homes and U+I Group c/o NLP | The sites- Charlton | C7       | It is presumably for the above reason that the finally-agreed boundary of the Strategic Industrial Location was re-defined through the Core Strategy Examination to exclude this north-western part of the wider Industrial Estate. As stated in the Inspectors report - "Evidence was submitted to the Hearings in relation to the Westminster Industrial Estate, including vacancy levels, the viability of redevelopment, and the applicability or otherwise of conclusions based on a cluster wide assessment. The balance of the evidence submitted persuades me that the older multi storey industrial buildings in the north west corner of the Estate are more suited to redevelopment for mixed uses and should therefore be excluded from the SIL boundary." (Our emphasis) This position was agreed between the Council, the GLA and the existing landowners at the Hearing. The boundary reflects the real-life distinction between larger and more modern industrial space to the south and east and the older, less-adaptable, buildings in the north and west (the representation site part). In so doing, it reflects the absence of need for this prominent part of the future regeneration of Charlton Riverside alongside Barrier Park to be protected against loss of industrial or other employment uses – whilst still allowing the full delivery of the required employment retention levels as set out in the London Plan and RB Greenwich Core Strategy. The policy background to this part of the wider Site is thus no different from the wider area to the west of the proposed enhanced Barrier Park and should accordingly be treated in the same way in terms of delivery objectives - residential-led mixed use development including offices and creative industries which offer an appropriate backdrop to the enhanced Barrier Park when viewed from the core Charlton Riverside Area. | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use. |
| 12 | Agent                                  | Galliard                             | The sites-          | C7       | Related to this, the Issues and Options' suggested lack of flexibility  | The next version of the Site Allocations will   |

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|    | representing business/<br>landowner       | Homes and U+I Group<br>c/o NLP          | Charlton               |          | for sites like Westminster Industrial Estate to deliver housing alongside commercial development would mean that the vision for Charlton Riverside would become one of land use zoning rather than a truly mixed use urban development with all the character and opportunities this could deliver. In this respect, the objectives of the masterplan and the London Plan are being disregarded due to the suggested rigid approach to site allocation. Promoting a mix of uses also allows for the land to deliver additional benefits to the urban environment. A residential led mixed use development at the Site would directly contribute to the public realm offer, in particular to Barrier Park. Failure to develop this site would ultimately detract from the masterplans objectives for the green core, being fronted by existing, vacant industrial space. It is our view, that the success for the envisioned green core at Barrier Park is dependent around the masterplans place making aspirations. To ensure quality amenity space is provided, the neighbouring land uses should thread together the east and west boundaries of Barrier Park, such that it is not used to mark a transition in use, but act as one of many public realm reliefs within a planned and well-formed mixed use environment. | reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use.   |
| 12 | Agent representing business/<br>landowner | Galliard Homes and U+I Group<br>c/o NLP | The sites-<br>Charlton | C7       | The current Issues and Options consultation suggests a possible drastic reduction not only of the developable space within Charlton Riverside, down to 75ha, but also reducing the areas expected to deliver mixed uses including residential, down to 47ha. This will have two impacts against the delivery of the Core Strategy target of 4,700 homes within this greatly reduced area: 1. As suggestion that fewer homes will be delivered; or 2. Greater densities are sought to deliver the same number of homes within 60-65% of the designated Opportunity Area. Given the aspirations in DCLG's latest consultation on the NPPF and recent Budget Announcements, the suggestion of delivering fewer homes is highly incongruous with national and regional policy and something we would anticipate the GLA to fight hard to retain (i.e. housing numbers). Therefore the issue is assumed to be around density. Without considering these areas to be mixed use, a density of 100  | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use. |

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|    |  |                                      |                     |          | units per hectare would be required. Applying the London Plan Housing SPG approach to mixed uses and assuming that 30% of floor space in a mixed use area could be commercial, the housing density would increase to over 140 units per hectare.  |   |
| 12 | Agent representing business/ landowner | Galliard Homes and U+I Group c/o NLP | The sites- Charlton | C7       | The options for future use are not appropriate. The site should be allocated for residential-led mixed use development including offices, creative industries and small-scale retail.   | The next version of the allocation will include the potential for the site to accommodate an element of residential use, in line with the 2017 Charlton Riverside SPD.  |
| 12 | Agent representing business/ landowner | Galliard Homes and U+I Group c/o NLP | The sites- Charlton | C7       | The suggestion in the Issues and Options consultation to substantially reduce the area available for residential development would result in increased densities; within this context, RB Greenwich would need to recognise that the residential element at Charlton Riverside would no longer be able to deliver 4,700 whilst including a quantitative proportion of family sizes dwellings and low rise terrace typologies. With the inclusion of Westminster Industrial Estate within the area for mixed use development, including residential, it would assist reducing density pressures in other areas.  | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use. |
| 12 | Agent representing business/ landowner | Galliard Homes and U+I Group c/o NLP | The sites- Charlton | C7       | This Site is a key consideration within the eastern area of the Masterplan that could be the catalyst that unlocks and links the remaining employment space to the east and the heart of the masterplan to the west. If mixed-use development does not come forward, as will be the case if the proposed allocation does not allow for inclusion of residential use, it would have a significant impact on achieving Charlton Riverside's wider vision. It would result in the new core area fronting onto the Thames Barrier Park being left to face the existing employment buildings, including increasingly vacant space, rather than a vibrant and suitable mixed use extension to the main masterplan area. | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being   |

| ID | Type of organisation       | Name | Section          | Site Ref | Summary of comments  | RBG response   |
|----|----------------------------|------|------------------|----------|--|--|
|    |                            |      |                  |          |  | accommodated in premises where they are mixed with residential use.  |
| 13 | Specific Consultation Body | GLA  | General comments |          | The draft Site Allocations document is generally welcomed, however, there are some matters that require further work to ensure the documents are sound and in general conformity with the London Plan.   | Noted.   |
| 13 | Specific Consultation Body | GLA  | General comments |          | Economy and employment, Paragraph 4.14: The Local Plan sets out a level of release of Strategic Industrial Land (SIL) to 2028 that matches the indicative benchmark set out in Annex I of the Land for Industry and Transport SPG. This benchmark is for the period to 2031, and therefore the Royal Borough should closely monitor the release of SIL to ensure it will not exceed the benchmark in the period beyond 2028. | The draft London Plan and associated evidence base (London Industrial Land demand Study, 2017) identifies Greenwich as a 'retain capacity' borough for the purposes of industrial land management. While the Issues and Options consultation suggested that the Site Allocations may consider revising SIL boundaries (albeit specific to one site in the Thamesmead area), this is not supported by the most up-to-date evidence. The 2012 Employment Land Review that informed the SIL release taken forward through the Core Strategy with Detailed Policies revised SIL boundaries in the Greenwich Peninsula West area, and the Inspector's report on the Core Strategy with Detailed Policies did not recommend that SIL boundaries be reviewed further during the preparation of the Site Allocations Local Plan. Therefore the Site Allocations Local Plan will not seek to revise SIL boundaries as there is no justification for doing so. |
| 13 | Specific Consultation Body | GLA  | General comments |          | Housing Paragraph 4.3: The Local Plan period is set out as up to 2028. However, the Housing section refers to a 10-year period 2015-2025, and a target of 26,850 net additional dwellings. London Plan Policy 3.3D is clear that where a target beyond 2025 is required, boroughs should roll forward and seek to exceed the target in table 3.1 until it is replaced by a revised London Plan                               | The Core Strategy recognises that boroughs should roll forward and seek to exceed the housing targets set in the London Plan.  |

| ID | Type of organisation                 | Name              | Section                          | Site Ref | Summary of comments   | RBG response  |
|----|--------------------------------------|-------------------|----------------------------------|----------|---|---|
|    |                                      |                   |                                  |          | Target. The Local Plan should make clear that it is providing at least 2,685 net additional dwellings in the period to 2028, and allocate sites accordingly, if necessary.  |   |
| 13 | Specific Consultation Body           | GLA               | General comments                 |          | Retail and town centres, Paragraph 4.23 Subject to meeting the relevant criteria, the supports the potential reclassification of Woolwich as a Metropolitan Centre.   | Support noted.  |
| 14 | Amenity Group/ Residents Association | Greenwich Society | The sites- Greenwich town centre | G5       | Events are overtaking the planning proposals for site G5. It is understood that a planning application for the residential development by Fairview Homes is in the offing – for the same site under the name Hope Wharf.  | Site has been redeveloped and will not be included in the next version of the Site Allocations.   |
| 14 | Amenity Group/ Residents Association | Greenwich Society | The sites- Greenwich town centre | G6       | Query the '6 storeys' mention in the 'Brief description of site' column for site G6, as it is a 5-storey building. The building limit proposed for any replacement of the police station should be limited, also, to 5 storeys. Should not be assumed that redevelopment is the only option as it is a fairly good building when viewed in conjunction with Meridian House. | Existing policies provide sufficient guidance regarding development of this small 0.15ha site, and it will not be included in the next version of the site allocation.  |
| 14 | Amenity Group/ Residents Association | Greenwich Society | The sites- Greenwich town centre | G1       | Support maintaining G1 in community use, but would favour its continued use as an adventure playground.   | Core Strategy Policy H(e) safeguards existing play areas. This site will not be included in the next version of Site Allocations.   |
| 14 | Amenity Group/ Residents Association | Greenwich Society | The sites- Greenwich town centre | G3       | Support mixed uses in future on G3 and welcome emphasis on need for any redevelopment to be appropriate for the World Heritage Site buffer zone. Support 'customer parking', if short-term, and limited: the present car park is not a sight worthy of Greenwich Town Centre and appears to be mostly used for long term parking by business people.                        | Support noted. Site is within multiple ownership, including residential and commercial. Despite being allocated for mixed use development for over ten years in the UDP, there have been no proposals brought forward regarding the site. Site is considered unlikely to be comprehensively redeveloped within the current Local Plan period, and will not be included in the next version of the Site Allocations. |
| 14 | Amenity Group/ Residents Association | Greenwich Society | The sites- Greenwich town centre | G10      | Support the change to residential of site G10. Redevelopment of the telephone exchange fronting Maze Hill is welcome. However, the sorting office fronting Greenwich Park Street is on the Council's Local List of buildings of local architectural and historic interest, and falls within the East Greenwich conservation area. It  | The former sorting office has been redeveloped for residential, the telephone exchange is operational and part of the exchange is being considered for inclusion on the Local Heritage List. Relatively small   |



| ID | Type of organisation                 | Name              | Section                          | Site Ref | Summary of comments  | RBG response  |
|----|--------------------------------------|-------------------|----------------------------------|----------|--|---|
|    |                                      |                   |                                  |          | is considered that these facts should be mentioned in the schedule – and that the column, 'Options For Future Use', should include a stated preference for its retention and conversion to residential, or another suitable use. | site with limited scope for change, and existing policies provide sufficient guidance should proposals be forthcoming. This site will not be taken forward in the next version of the Site Allocations.   |
| 14 | Amenity Group/ Residents Association | Greenwich Society | The sites- Greenwich town centre | G2       | Agree mixed use  | Support noted. Site has been redeveloped and will not be included in the next version of the Site Allocations.  |
| 14 | Amenity Group/ Residents Association | Greenwich Society | The sites- Greenwich town centre | G4       | Agree wording of G4, especially re the architectural and historic value of the High Road frontage buildings, the retention of which we consider essential.   | Support noted. Site includes both statutory and locally listed buildings and is within the West Greenwich Conservation Area. There is limited scope for change on this site, and it will not be included in the next version of the Site Allocations.   |
| 14 | Amenity Group/ Residents Association | Greenwich Society | The sites- Greenwich town centre | G7/G 8   | Support proposed retention in employment use of G7 and G8  | Support for retention of employment use noted. Site G8 (55-71 Norman Road and Railway Arches) is an operational skip hire and waste transfer site between the railway and light industrial units. It is separated from G7 by a main road. Existing policies provide sufficient guidance regarding the development of local employment sites and therefore G8 will not be taken forward in the next version of the Site Allocations.   |
| 14 | Amenity Group/ Residents Association | Greenwich Society | The sites- Greenwich town centre | G9       | Support the change of G9 from storage and parking to residential   | Relatively small site (0.29ha) owned by DLR with no known development interest. Site is constrained by railway and existing residential properties, as well as being within the West Greenwich Conservation Area. There is limited scope for change on this site, and existing policies provide sufficient guidance should proposals be forthcoming. This site will not be taken forward in the next version of the Site Allocations. |

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|----|--------------------------------------|-------------------|------------------|----------|---|--|
| 15 | Amenity Group/ Residents Association | Greenwich Society | General comments |          | The Greenwich Society welcomes this document as providing helpful complementary information to the Council's Core Strategy. We note that the early sections are mainly a summary of the relevant parts of the adopted Core Strategy on which we have commented before: our comments here relate primarily to section 4, Issues and Options, and the sites in the Society's particular area of interest, viz. section 5, Greenwich Peninsula (sites GP 1-13); and Greenwich Town Centre (sites G 10). One general point: 'cumulative impact'; whilst the cumulative impact of uses within the Borough's centres is considered under a specific heading of that name, there appears to be no such systematic attempt to look at the 'cumulative impact' across the whole area to meet foreseeable needs for better transport and social infrastructure. | The Infrastructure Delivery Plan is being updated alongside the Site Allocations to ensure that providers are informed, insofar as possible, regarding the future development potential of the area and that appropriate on- and off-site mitigation measures are secured.   |
| 15 | Amenity Group/ Residents Association | Greenwich Society | General comments |          | 4.29 and 4.30: We strongly support the commitment to preserving the riverside path and seeking opportunities to enhance it - and the preparation of a Green Infrastructure Plan for open space etc. and safeguarding of all sites designated as community open space or Metropolitan Open Land.   | Support noted. Improvements to the wider road network from Kidbrooke to Eltham are beyond the scope of the Site Allocations.   |
| 15 | Amenity Group/ Residents Association | Greenwich Society | General comments |          | 4.36: Under 'Social and Community Infrastructure', Plumstead Library is Identified as a site with the potential to contribute to social and community infrastructure: we consider that The Arches in Trafalgar Road should be similarly identified.   | The facilities previously provided at the Arches have been re-provided at the nearby Heart of East Greenwich site. As the most recent lawful use of the site was D1 use, the principal of the proposed use is already established on the site. Furthermore, Core Strategy Policy CH(a) ensures that, should the site be suitable for continued use as a community facility, its redevelopment for an alternate use would not be supported. |
| 15 | Amenity Group/ Residents Association | Greenwich Society | General comments |          | Para 4.25: We support the proposal re "areas of cumulative impact concern" where there are concentrations of hot food takeaway shops and/or betting shops, and that these areas should be mapped – and, similarly, 4.26 in proposing to identify areas of RBG where there is poor access to healthy food "and develop appropriate policy responses"; but here we are a little sceptical about how effective such action would be.   | The mapping of concentrations of hot food takeaway shops and/or betting shops is outside the scope of the Site Allocations.  |

| ID | Type of organisation                   | Name                                   | Section                          | Site Ref | Summary of comments   | RBG response   |
|----|--|--|----------------------------------|----------|---|--|
| 15 | Amenity Group/ Residents Association   | Greenwich Society                      | General comments                 |          | Para 4.5 Housing: In very much agreeing with the paragraph, “It is vital that Royal Greenwich's unique housing needs are met....”, we note that actual provision of ‘affordable homes’, regrettably, is not being met, much to the detriment of the Council’s social and housing policies.  | The provision of affordable housing is largely outside the scope of the Site Allocations   |
| 16 | Agent representing business/ landowner | Greenwich University c/o Bilfinger GVA | The sites- Woolwich              | W8       | It is our view that strategic policy would support the following development: Retention/conversion of the existing building for any town centre use.  | As a small site of 0.20ha comprising a single locally listed building, it is considered that existing policies provide sufficient guidance should proposals be forthcoming.  |
| 17 | Agent representing business/ landowner | Halliard Properties c/o WYG            | The sites- Greenwich town centre | G7       | The landowner objects to the designation of the site to be wholly used for light industrial / small business units and offices as this form of development is unlikely to enable the best use of the land. The location of the site immediately adjoining Deptford Creekside provides the ideal opportunity for a series of significant buildings to be developed across the site which whilst including some employment floorspace can also include a significant element of residential floorspace. As paragraph 3.3.35 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies states, “Creekside is an area that is already undergoing significant change including mixed use developments at Creekside Village and Deals Gateway and a number of sites already have the benefit of planning permission such as Hiltons, Lions and Saxons Wharves and McMillan Street.” In our view limiting uses as proposed in the consultation will not result in the maximum development potential of the site being utilised. Light industrial and small business units can only realistically be developed over a maximum of two floors of accommodation above ground level. Whilst it is accepted that the site lies within the defined town centre of Greenwich, it is located on its extreme western boundary. | Objection noted. The next version of the Site Allocations will clarify that that there is opportunity for the introduction of residential use on upper floors subject to the reprovion of light industrial and SME B-use space at ground and first floors. |
| 17 | Agent representing business/ landowner | Halliard Properties c/o WYG            | The sites- Greenwich town centre | G8       | The Phoenix Wharf site in its current form used as a builder’s merchant provides a very low level of employment in comparison to its potential. As the illustrative proposals that have been prepared by 3D Reid Architects demonstrates, the site can be developed to a much greater intensity with a mixed use development that can provide both modern employment  | Objection noted. The next version of the Site Allocations will clarify that that there is opportunity for the introduction of residential use on upper floors subject to the reprovion of light industrial and SME B-use space at ground and first floors. |

| ID | Type of organisation       | Name             | Section          | Site Ref | Summary of comments  | RBG response  |
|----|----------------------------|------------------|------------------|----------|--|---|
|    |                            |                  |                  |          | <p>floorspace, suited to small and medium sized enterprises that would be occupied to a much greater intensity combined with a significant number of residential units. This mix of land uses would reflect the many other mixed use developments that have been built or have planning permission in the Deptford Creek Opportunity Area. The following images are taken from the 3D Reid document prepared to support the forthcoming Section 17 Certificate of Alternative Appropriate Development application. These show the following: Emerging context – the plan shows how the area around Deptford Creek is changing with mixed use developments predominating; Land Use – the land use plan shows the predominance of residential uses coming forward in the Deptford Creek area; Building Height – this plan illustrates the development of much higher buildings in the Deptford Creek area; Option 2 Masterplan – the left hand drawing illustrates how employment use (denoted as EMP/D on the drawing) can be incorporated into a mixed use redevelopment proposal for the wider site. Accordingly we request that the Royal Borough reconsiders the proposal to allocate Phoenix for wholly employment purposes for the reasons set out above.</p> |   |
| 18 | Specific Consultation Body | Highways England | General comments |          | No comments to make.   | Noted.  |
| 18 | Specific Consultation Body | Historic England | General comments |          | <p>It appears that the details for each site identified has included heritage assets where known. However many of the sites fall within Archaeological Priority Areas (APA), which are currently not identified in the 'existing planning policy designation' section. For example in Woolwich sites W2, W3, W5, W7 and W10 appear to fall fully or part within the borough's APA. In addition there are many sites where archaeological finds have or are currently being found. For example in Thamesmead a site adjoining site allocation T9 has identified important archaeology in the form of Bronze Age finds. It is therefore possible that the archaeology already found could also be present in site T9. This type of</p>   | The next version of the Site Allocations will include reference to archaeology. |

| ID | Type of organisation       | Name             | Section          | Site Ref | Summary of comments  | RBG response   |
|----|----------------------------|------------------|------------------|----------|--|--|
|    |                            |                  |                  |          | heritage information and policy designation should be included in the site allocation details.   |  |
| 18 | Specific Consultation Body | Historic England | General comments |          | <p>Finally we would encourage the Council to use the Site Allocations document as a useful tool in which to articulate fully the development potential of sites, in the context of the various designations that may influence developability and deliverability. For example, in areas of heritage sensitivity we would expect the Site Allocations to include parameters to development which takes account of the significance of heritage assets that may be impacted. This approach would be especially pertinent for proposals that could be strategic and far reaching in their potential impact such as tall buildings. In addition where there is a concentration of development sites tools such as modelling of potential form and scale of development should be explored. This would then help providing clarity on the realistic capacity of a site and/or sites (cumulatively) within the existing context, and help ensure the delivery of sustainable development that provides economic, social and environmental next gains (in line with national policy).</p> | The next version of the Site Allocations will include both development requirements and guidelines to ensure that sufficient guidance is provided to enables proposals to respond positively and appropriately to heritage and other contextual issues.  |
| 18 | Specific Consultation Body | Historic England | General comments |          | <p>For ease we would suggest that the details of each site are supported by a site map. This site map could then be annotated with the various policy designates that may influence its development. This includes designations that impact directly on the site (within the boundary of the site allocation) or within its immediate area. which may have an indirect impact upon the sites developability. This approach would help highlight to potential developers and decision makers the matters that would need to be taken into account when developing a site, that may be outside its boundaries. In the case of heritage this could include setting issues, where the significance of an adjoining heritage asset could potentially be affected by development of a site allocation. Recognising this scenario would reinforce the plans compliance with national planning policy and its requirement of conserving the historic environment.</p>  | The next version of the Site Allocations will ensure that heritage considerations which need to be taken into account in developing proposals for the site, including setting issues, are explicit within the allocation. Resource permitting, the suggestion of producing individual site maps detailing policy designations, will also be taken forward. |
| 18 | Specific Consultation      | Historic England | General comments |          | In addition to identification of heritage assets, we would also encourage you to include any Heritage Assets at Risk (HAR).  | HAR will be identified within relevant allocations.  |

| ID | Type of organisation                   | Name                               | Section                              | Site Ref | Summary of comments  | RBG response   |
|----|--|------------------------------------|--------------------------------------|----------|--|--|
|    | Body                                   |                                    |                                      |          |  |  |
| 19 | Agent representing business/ landowner | HUB Group c/o Barton Willmore      | The sites- Thamesmead and Abbey Wood | AW1      | <p>Site included within the Cross Quarter masterplan area and 3.3 ha of it is in proposed site allocation AW1.</p> <p>This site has been identified as part of the Abbey Wood and Thamesmead Housing Zone. Request to either amend the site allocation to include the remainder of HUB's site or to create a new site allocation, separate from the Lyndean Industrial Estate, for HUB's proposals. (HUB site map enclosed).</p> <p>Cross Quarter Masterplan granted hybrid planning permission in December 2013 for mixed use, including residential and retail. In late 2015 HUB acquired a 0.4 ha part of the site, on Felixstowe Road that was originally intended to provide a 100 bed hotel, up to 316 sq. m of start-up business units (B1) and up to 12 residential units (as per outline planning permission 12/30508/F.</p> <p>Pre-application discussions being held to amend scheme - currently considering 200-250 residential units, a hotel and other commercial uses. HUB is soon to enter into a Planning Performance Agreement with the Council and planning to submit a planning application in summer 2016.</p> <p>Initial discussions with Council positive, as site is emerging as a tall building location, justified due to Abbey Wood arrival of Crossrail in 2018 and the GLA's identification of the wider Abbey Wood Opportunity Area. Scheme will assist in meeting borough housing target.</p> | The site allocation boundary has been amended to include the remainder of the HUB site   |
| 20 | Agent representing business/ landowner | Knight Dragon Developments Limited | The sites - Greenwich Peninsula      | GP4      | <p>I note that there are several sites (GP4, GP6, GP5, GP 12 and GP10) which cover the area which are under the Knight Dragon and feel that a single site should be presented as per the attachment which have annotated GP3. In addition I believe that the brief description of the site should be updated by quoting that the site benefits from outline planning permissions your ref:15/0716/O for comprehensive mixed use development of the</p>   | Agreed that the Knight Dragon site is more clearly presented as a single site allocation, with reference to the outline planning permission. |

| ID | Type of organisation       | Name                     | Section                              | Site Ref | Summary of comments   | RBG response   |
|----|----------------------------|--------------------------|--------------------------------------|----------|---|--|
|    |                            |                          |                                      |          | site.   |  |
| 21 | Specific Consultation Body | London Borough of Bexley | General comments                     |          | Bexley will wish to ensure that the growth of Woolwich into a Metropolitan centre, along with the growth of Greenwich and Eltham do not have an adverse impact on the viability and vitality of Bexley's own centres. We welcome continued communications, specifically with regards to retail capacity evidence, around this to ensure that any potential impacts are minimised.   | A borough-wide Retail and Leisure Study was completed in 2018 and will inform the next version of the Site Allocations.  |
| 21 | Specific Consultation Body | London Borough of Bexley | General comments                     |          | Bexley considers it essential that arrangements have been made by the Royal Borough and its partners to meet future school place need within the Royal Borough itself. This should take account of current place shortages and future needs (including special needs) associated with the increase in population linked to both new development and population intensification, during the plan period.   | The Infrastructure Delivery Plan is being updated alongside the Site Allocations to ensure that providers are informed, insofar as possible, regarding the future development potential of the area and that appropriate on- and off-site mitigation measures are secured. |
| 21 | Specific Consultation Body | London Borough of Bexley | General comments                     |          | Bexley has also identified a number of Sites of Importance for Nature Conservation that overlap the two boroughs or are adjacent to the Royal borough. Details of these sites can be found in Bexley's 'Sites of Importance for Nature Conservation 2011' document, which can be downloaded by following the link: <a href="http://www.bexley.gov.uk/article/12495/Sites-of-Importance-for-Nature-Conservation-in-Bexley">http://www.bexley.gov.uk/article/12495/Sites-of-Importance-for-Nature-Conservation-in-Bexley</a> . These should be taken into account when preparing the Royal Borough's up to date Green Infrastructure Study. Bexley are in the process of updating the Sites of Importance for Nature Conservation evidence and look forward to sharing the emerging findings and working jointly to address any issues. | An updated Green Infrastructure Study will inform the next version of the Site Allocations. Community Open Space and MOL designations will be considered as part of the Local Plan review.   |
| 21 | Specific Consultation Body | London Borough of Bexley | The sites- Thamesmead and Abbey Wood |          | Bexley has been working with TfL and other partners (including the Ebbsfleet Development Corporation) on the potential for an eastern extension of Crossrail beyond Abbey Wood. For this area, connectivity into North West Kent (including linking to both Ebbsfleet Garden City and the London Paramount resort) could be improved very significantly. This is relevant to the aspirations of the Site allocation local plan.   | Joint working regarding potential DLR extension and transit links will be taken forward as part of developing the Thamesmead and Abbey Wood Opportunity Area Planning Framework (OAPF).  |
| 21 | Specific Consultation      | London Borough of        | General comments                     |          | Bexley welcomes continued communications and joint working in relation to the development of Thamesmead and Abbey Wood to   | Commitment to continued joint working noted and welcomed.  |

| ID | Type of organisation       | Name                     | Section                         | Site Ref | Summary of comments  | RBG response  |
|----|----------------------------|--------------------------|---------------------------------|----------|--|---|
|    | Body                       | Bexley                   |                                 |          | ensure the potential benefits to the Royal Borough and Bexley are maximised in this strategic development location. As part of the Duty to Co-operate, we look forward to continuing to work with Royal Greenwich Council to ensure that this Local Plan Site Allocations document impacts positively on the South-eastern part of London, including Bexley.   |   |
| 21 | Specific Consultation Body | London Borough of Bexley | The Sites - Greenwich Peninsula |          | Bexley will wish to ensure that the proposed new district centre at Greenwich Peninsula does not have an adverse impact on the viability and vitality of Bexley's own centres. We welcome continued communications, specifically with regards to retail capacity evidence, around this to ensure that any potential impacts are minimised.   | An updated Retail and Leisure Study will inform the next version of the Site Allocations.   |
| 21 | Specific Consultation Body | London Borough of Bexley | General comments                |          | Bexley would welcome the opportunity to discuss with the Royal Borough, the routes of potential transit links (whether bus, tram etc.) associated with the Gallions Crossing. These may require specific safeguarding of land for bus priority (or more), in particular between Woolwich and Thamesmead, and on to Abbey Wood. This is shown in a general sense in Figure 4.1 as an indicative bus priority route between Greenwich Peninsula, Woolwich and Thamesmead, but thought needs to be given as to how this might be dealt with in the Site allocation local plan. It may be that no specific safeguarding is shown, but suitable wording could be added about additional/improved public transport priority and linkage, whether as part of a free-standing initiative or linked to transit schemes using the proposed river crossing. | Joint working regarding potential DLR extension and transit links will be taken forward as part of developing the Thamesmead and Abbey Wood Opportunity Area Planning Framework (OAPF). |
| 21 | Specific Consultation Body | London Borough of Bexley | The Sites - Greenwich Peninsula | GP6      | For Site GP6 'Site south of O2 Arena including North Greenwich Station', it is very important that the design of the new transport interchange provides sufficient capacity to allow for future growth.  | The design of the interchange has been secured as part of the Knight Dragon Peninsula Masterplan permission.  |
| 21 | Specific Consultation Body | London Borough of Bexley | General comments                |          | It is important that, as further details emerge of potential local transit initiatives (whether or not linked to the proposed Gallions Crossing), those details, including any land safeguarding, be included in the Site allocation local plan. This same requirement will probably need to be included in other areas too.   | Joint working regarding potential DLR extension and transit links will be taken forward as part of developing the Thamesmead and Abbey Wood Opportunity Area Planning Framework (OAPF). |
| 21 | Specific Consultation      | London Borough of        | General comments                |          | It is noted that the Royal Borough recognise the need for an additional Civic Amenity site within the Charlton Riverside/North   | Support for industrial/waste use noted. Existing London Plan and Core Strategy  |



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|----|----------------------------|--------------------------|------------------|----------|--|--|
|    | Body                       | Bexley                   |                  |          | Greenwich area and that an “area of search” has been mapped (as site C1). The ongoing work on sustainable waste management is welcomed by Bexley.  | policies provide sufficient guidance regarding development within SILs, including for waste, and this site will therefore not be included in the next version of the Site Allocations.   |
| 21 | Specific Consultation Body | London Borough of Bexley | General comments |          | It is noted that the Royal Borough’s 2008 Open Space Study identified a number of open space and sports pitch deficiencies in specific areas. The Royal Borough propose to try “to start to address” some of these through development of specific sites. Para 4.30 states ‘The Royal Borough is currently in the early stages of preparing an up to date Green Infrastructure Study. Once completed, this will provide additional evidence to help determine the most appropriate strategy to take.’ It is noted that sites already designated as either community open space or MOL remain protected until that study has provided a full review. Bexley supports the protection of the Royal Borough’s Green spaces. The Mayor of London’s ‘All London Green Grid Green SPG’, identifies grid area 5 ‘River Cray and Southern Marshes’ and 6 ‘South East London Green Chain Plus’ as being within the Royal Borough and Bexley. The SPG identifies strategic green links crossing between the Royal Borough and Bexley. | An updated Green Infrastructure Study will inform the next version of the Site Allocations. SINC designations will be reviewed following completion of the Study, following the process recommended by the London Wildlife Advisory Group. Bexley will be invited to participate in this process |
| 21 | Specific Consultation Body | London Borough of Bexley | General comments |          | It is welcomed that demand modelling is currently under way to identify the need for future health infrastructure. We look forward to working with the Royal Borough to explore opportunities for joint working where appropriate.   | The Infrastructure Delivery Plan is being updated alongside the Site Allocations to ensure that providers are informed, insofar as possible, regarding the future development potential of the area and that appropriate on- and off-site mitigation measures are secured.                       |
| 21 | Specific Consultation Body | London Borough of Bexley | General comments |          | It’s noted that the Royal Borough show the safeguarding plan for transport schemes from the UDP. This includes the aspiration for a DLR extension to Eltham, although that scheme is understood not to be part of any TfL programme. It is also noted that this scheme is not mentioned specifically in the text on that page. It is not clear therefore whether the Royal Borough still intend to highlight the need for safeguarding land for this scheme in the Site allocation local plan. In itself, the DLR Eltham proposal doesn’t  | Core Strategy Policy IM3 Critical Physical Infrastructure safeguards transport schemes and these are shown on the Policies Map.  |

| ID | Type of organisation         | Name                      | Section                              | Site Ref | Summary of comments  | RBG response   |
|----|------------------------------|---------------------------|--------------------------------------|----------|--|--|
|    |                              |                           |                                      |          | affect Bexley. But during Greenwich's work on the concept, mention has been made of taking the scheme through to Falconwood, just over the Bexley border. It therefore does have an indirect effect on the borough of Bexley. In clarifying its status, it would then become clearer about whether there's a potentially viable scheme. Bexley welcomes continued communications and joint working in relation to this.  |  |
| 21 | Specific Consultation Body   | London Borough of Bexley  | The sites- Thamesmead and Abbey Wood |          | Paragraph 5.31 refers to 20 new housing zones. This figure should be updated to 31 housing zones, which is the most recent figure from the Mayor of London.  | This figure was provided for context and will not be included in the next version of the document.                                       |
| 21 | Specific Consultation Body   | London Borough of Bexley  | The sites- Thamesmead and Abbey Wood | AW1, AW2 | Sites AW1 (Lyndean Industrial Estate) and AW2 (Abbey Wood telephone exchange) are particularly well located for easy access to Crossrail at Abbey Wood station. This should certainly be taken into account in planning of development densities. However, traffic access will be predominantly or completely via Bexley's roads; the Council therefore has a direct interest in the emerging development proposals of these sites. The proposed headroom restriction on Felixstowe Road under the Harrow Manorway flyover will affect movement of larger vehicles to/from Site AW1. | The proximity to Crossrail and access requirements will be taken into account in developing the next version of the site allocation.     |
| 21 | Specific Consultation Body   | London Borough of Bexley  | The sites- Thamesmead and Abbey Wood | T7       | The eastern edge of Site T7 (Titmuss Road) runs close to Harrow Manorway, for which a range of highway measures are planned, including public transport priority and segregated facilities for cyclists. Proposals for this site should be consistent with provision of those measures and not preclude their delivery.  | The next version of the site allocation will reflect the planning improvements to Harrow Manorway.                                       |
| 21 | Specific Consultation Body   | London Borough of Bexley  | General comments                     |          | We also look forward to working with Greenwich on reviewing the future status of Wilton Road Neighbourhood Centre and its role within this hierarchy.  | The status of neighbourhood centres are outside the scope of the Site Allocations.   |
| 21 | Specific Consultation Body   | London Borough of Bexley  | General comments                     |          | We look forward to working with the Royal Borough to explore opportunities for joint working on green infrastructure proposals to address, in particular, open space/sports pitch shortages in Abbey Wood and Thamesmead.  | Noted.   |
| 22 | Agent representing business/ | London Fire and Emergency | The sites- Plumstead town centre     | P5       | The LFEPA sites within the borough are East Greenwich Fire Station, Eltham Fire Station, Greenwich Fire Station, Lee Green Fire Station and Plumstead Fire Station. The LFEPA are supportive   | Agreed that it is for the LFEPA to determine the most appropriate location from which to deliver their services from. As a small site of |

| ID | Type of organisation          | Name                                      | Section            | Site Ref | Summary of comments   | RBG response  |
|----|-------------------------------|---|--------------------|----------|---|---|
|    | landowner                     | Planning Authority<br>c/o Dron and Wright |                    |          | of the identification of Plumstead Fire Station as a potential development site. However, the final sentence of the 'reasons for justification/ should be deleted. If it is not possible for LFEPA to secure a suitable alternative site it may wish to pursue a development of the property to include a new fire station. It is inappropriate for the potential relocation to be limited to the Thamesmead Housing Zone or elsewhere in Plumstead because the LFEPA provide fire cover across the whole of London and locations are based on response times, fire cover and other operational matters. That duty should not be fettered by the Site Allocations document, or any other planning considerations, as that could be detrimental to the safety of the local community.  | 0.14ha, it is considered that existing policies provide sufficient guidance should the LFEPA choose to relocate the fire station.   |
| 23 | Voluntary Body/Interest group | London Gypsy and Traveller Unit           | General comments   |          | Noted that the council has commissioned a Gypsy and Traveller Accommodation Needs Assessment last year. While this study was probably not completed in time for this round of consultation it is essential that the next iteration of the plan includes the findings of the GTANA together with suitable Site Allocations. As soon as the GTANA is finalised the council should engage with the Gypsy and Traveller community to discuss about potential sites to meet identified needs. The council should consider a range of options for accommodating new Gypsy and Traveller caravan site provision, such as smaller sites and including a small number of pitches in large residential development schemes. The Site Allocations Local Plan has already designated a large number of sites for a range of uses and if the accommodation needs of Gypsies and Travellers are not considered alongside other needs in the plan making process this will result in unfair outcomes for the community, as there will be no adequate locations left to provide culturally suitable accommodation. The Royal Greenwich Core Strategy identifies the Site Allocations Plan as the mechanism to meet the accommodation need of Gypsies and Travellers. The Plan would not be sound in the absence of policies and allocations to meet the needs of the Gypsy and Traveller community. | The Royal Borough conducted a Gypsy and Traveller Accommodation Assessment in July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to deliver any new transit provision at this time. |
| 23 | Voluntary Body/Interest       | London Gypsy and                          | The sites-Charlton | AWI      | Site AWI should be reviewed to assess the potential of the site for accommodating some Gypsy and Traveller pitch provision  | The Royal Borough conducted a Gypsy and Traveller Accommodation Assessment in   |

| ID | Type of organisation          | Name                            | Section            | Site Ref | Summary of comments   | RBG response  |
|----|-------------------------------|---------------------------------|--------------------|----------|---|---|
|    | group                         | Traveller Unit                  |                    |          | together with the other proposed uses.  | July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to deliver any new transit provision at this time.   |
| 23 | Voluntary Body/Interest group | London Gypsy and Traveller Unit | The sites-Charlton | AW2      | Site AW2 should be reviewed to assess the potential of the site for accommodating some Gypsy and Traveller pitch provision together with the other proposed uses. | The Royal Borough conducted a Gypsy and Traveller Accommodation Assessment in July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to deliver any new transit provision at this time. |
| 23 | Voluntary Body/Interest group | London Gypsy and Traveller Unit | The sites-Charlton | C10      | Site C10 should be reviewed to assess the potential of the site for accommodating some Gypsy and Traveller pitch provision together with the other proposed uses. | The Royal Borough conducted a Gypsy and Traveller Accommodation Assessment in July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to deliver any new transit provision at this time. |
| 23 | Voluntary                     | London                          | The sites-         | C2       | Site C2 should be reviewed to assess the potential of the site for  | The Royal Borough conducted a Gypsy and   |

| ID | Type of organisation          | Name                            | Section            | Site Ref | Summary of comments  | RBG response  |
|----|-------------------------------|---------------------------------|--------------------|----------|--|---|
|    | Body/Interest group           | Gypsy and Traveller Unit        | Charlton           |          | accommodating some Gypsy and Traveller pitch provision together with the other proposed uses.  | Traveller Accommodation Assessment in July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to deliver any new transit provision at this time.   |
| 23 | Voluntary Body/Interest group | London Gypsy and Traveller Unit | The sites-Charlton | C5       | Site C5 should be reviewed to assess the potential of the site for accommodating some Gypsy and Traveller pitch provision together with the other proposed uses.   | The Royal Borough conducted a Gypsy and Traveller Accommodation Assessment in July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to deliver any new transit provision at this time. |
| 23 | Voluntary Body/Interest group | London Gypsy and Traveller Unit | The sites-Charlton | GPI2     | Site GPI2 should be reviewed to assess the potential of the site for accommodating some Gypsy and Traveller pitch provision together with the other proposed uses. | The Royal Borough conducted a Gypsy and Traveller Accommodation Assessment in July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to deliver any new transit provision at this time. |

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|----|-------------------------------|---------------------------------|--------------------|----------|---|---|
| 23 | Voluntary Body/Interest group | London Gypsy and Traveller Unit | The sites-Charlton | GP4      | Site GP4 should be reviewed to assess the potential of the site for accommodating some Gypsy and Traveller pitch provision together with the other proposed uses. | The Royal Borough conducted a Gypsy and Traveller Accommodation Assessment in July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to deliver any new transit provision at this time. |
| 23 | Voluntary Body/Interest group | London Gypsy and Traveller Unit | The sites-Charlton | GP6      | Site GP6 should be reviewed to assess the potential of the site for accommodating some Gypsy and Traveller pitch provision together with the other proposed uses. | The Royal Borough conducted a Gypsy and Traveller Accommodation Assessment in July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to deliver any new transit provision at this time. |
| 23 | Voluntary Body/Interest group | London Gypsy and Traveller Unit | The sites-Charlton | T10      | Site T10 should be reviewed to assess the potential of the site for accommodating some Gypsy and Traveller pitch provision together with the other proposed uses. | The Royal Borough conducted a Gypsy and Traveller Accommodation Assessment in July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to deliver any new transit provision at this       |

| ID | Type of organisation          | Name                            | Section            | Site Ref | Summary of comments  | RBG response  |
|----|-------------------------------|---------------------------------|--------------------|----------|--|---|
|    |                               |                                 |                    |          |  | time.   |
| 23 | Voluntary Body/Interest group | London Gypsy and Traveller Unit | The sites-Charlton | T11      | Site T11 should be reviewed to assess the potential of the site for accommodating some Gypsy and Traveller pitch provision together with the other proposed uses.                    | The Royal Borough conducted a Gypsy and Traveller Accommodation Assessment in July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to deliver any new transit provision at this time. |
| 23 | Voluntary Body/Interest group | London Gypsy and Traveller Unit | The sites-Charlton | T6       | Site T6 should be reviewed to assess the potential of the site for accommodating some Gypsy and Traveller pitch provision together with the other proposed uses.                     | The Royal Borough conducted a Gypsy and Traveller Accommodation Assessment in July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to deliver any new transit provision at this time. |
| 23 | Voluntary Body/Interest group | London Gypsy and Traveller Unit | The sites-Charlton | K1-K7    | Sites K1-K7 should be reviewed to assess the potential of the site for accommodating some Gypsy and Traveller pitch provision together with the other proposed uses in later phases. | The Royal Borough conducted a Gypsy and Traveller Accommodation Assessment in July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to   |

| ID | Type of organisation                   | Name  | Section             | Site Ref | Summary of comments   | RBG response  |
|----|--|---|---------------------|----------|---|---|
|    |  |   |                     |          |   | deliver any new transit provision at this time.   |
| 23 | Voluntary Body/Interest group          | London Gypsy and Traveller Unit                 | General comments    |          | As soon as the GTANA is finalised the council should engage with the Gypsy and Traveller community to discuss about potential sites to meet identified needs. The council should consider a range of options for accommodating new Gypsy and Traveller caravan site provision, such as smaller sites and including a small number of pitches in large residential development schemes.  | The Royal Borough conducted a Gypsy and Traveller Accommodation Assessment in July/August 2015, published in 2016, to inform the Site Allocations Local Plan for the period to 2031. It concluded that there was no need for additional pitches for Gypsies and Travellers in Greenwich who meet the new definition of a Traveller, nor for Travelling Showpeople. It also concluded that there was not a need for the Council to deliver any new transit provision at this time. |
| 24 | Agent representing business/ landowner | London Square Development Ltd c/o Bilfinger GVA | The sites- Woolwich | W5       | The draft Site Allocations document limits the development opportunities of the site by mapping the location, amount and type of open space to be provided on site and there appears to be no supporting analysis of the need for open space in this location. The map on page 123 of the core strategy demonstrates that this site, as part of site allocation W5, does not fall within an open space deficiency area. The current designation is simplistic and it has not been considered how the proposed open space would connect with surrounding areas of open spaces. The site is not identified as a site to be wholly or partly open space under the 'Green Infrastructure' section on pages 17 and 18 of the document, so it is unclear what type of open space requirement this site would be meeting. Disagree that part of the site should be designated as open space to compensate for lack of open space provision in other schemes. The Warren/ Royal Arsenal site should have been considered on its own merits and the impacts of that development should have been considered and mitigated against within the scheme. The remaining sites and other landowners should not be penalised by having to compensate for any loss of open space as a result of other developments. London Square Development is willing to consider facilitating a pedestrian route through | It is agreed that it is overly prescriptive to seek to designate an exact location as community open space as part of a site allocation. The next version of the site allocation will clarify the requirement to provide publicly accessible open space on this large site to serve future residents of the site as well as to contribute to placemaking within the town centre.  |



| ID | Type of organisation                   | Name  | Section             | Site Ref | Summary of comments   | RBG response  |
|----|--|---|---------------------|----------|---|---|
|    |  |   |                     |          | potentially with a hard landscaped retail quarter which would provide some public realm. However, this is not to the extent shown on the Draft Site Allocations Paper and would not be a soft landscaped 'play' area.   |   |
| 24 | Agent representing business/ landowner | London Square Development Ltd c/o Bilfinger GVA | The sites- Woolwich | W5       | Site allocation W5 includes land outside of London Square Development's ownership. We would assume that separate parcels of land within this wider allocation could come forward independently providing that they do not prejudice development opportunities on neighbouring sites within the allocation. We would request on behalf of our client that the site allocation provides clarity on this matter.   | The next version of the site allocation will set out a cohesive vision for the site as a whole. While change on this site may be achieved through incremental development based on land ownerships or comprehensive development across land ownerships, to optimise development potential it is necessary that incremental development contributes to the achievement of the cohesive vision for the site and the wider area. |
| 25 | Agent representing business/ landowner | Meyer Homes c/o Nathaniel Lichfield & Partners  | The sites- Woolwich | W13      | Meyer Homes fully support the continued allocation of mixed use development including residential, retail and business/employment, thereby enabling residential led mixed use development on the Woolwich Central Phase 3 and 4 sites. The site is in a highly sustainable town centre location where high density development is suitable and appropriate. This is fully supportive of the Council's objective of establishing Woolwich as a Metropolitan Centre (Issues and Options Consultation para. 5.6) and capitalising on the arrival of Crossrail in 2018.   | Support noted.  |
| 26 | Specific Consultation Body             | Mineral Products Association                    | The sites- Charlton |          | The MPA is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. It has a growing membership of 480 companies and is the sectoral voice for mineral products. Each year the industry supplies £21 billion worth of materials and services to the economy and is the largest supplier to the construction industry. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. The GB construction sector is worth £135bn per annum, and c.20% of this activity takes place in London. The supply of mineral resources and their associated products is therefore a critical | Objection noted.  |

| ID | Type of organisation       | Name                         | Section            | Site Ref | Summary of comments   | RBG response  |
|----|----------------------------|------------------------------|--------------------|----------|---|---|
|    |                            |                              |                    |          | enabler to these activities and for the delivery of key infrastructure projects such as Thames Tideway and Crossrail. Our principal concern and objection to the Site Allocations consultation document is the potential effect of the allocations and associated future development within 'Charlton Riverside' on the safeguarded wharves that are essential in enabling and securing future sustainable supply of aggregates, asphalt and concrete to the construction market in London. We are aware that a number of member companies (Day Group, Cemex, Aggregate Industries and Tarmac) are also objecting on these grounds and in relation to site specific issues and we support their position.   |   |
| 26 | Specific Consultation Body | Mineral Products Association | The sites-Charlton | C2,C5    | National and Local planning policy provides safeguarding for Angerstein and Murphy's Wharves. While the proposed Site Allocations do not appear to incur directly on the safeguarded wharf areas, sensitive receptors in close proximity to these sites could introduce conflict and prejudice existing and future operations. This in turn could affect the sustainable, steady and adequate supply of materials as existing working practices potentially become constrained. The Site Allocations document should include more detailed information and guidance on how development within Sites C2 ad C5 would need to be designed and brought forward in order to ensure that it would not prejudice and/or constrain existing and future operation of the wharves and associated activities. This would help flag this to prospective developers at an early stage and so help to ensure these are integral to the design and well-conceived, rather than resisted and added as inadequate bolt-ons at a later stage. | Objection noted. The next version of the Site Allocations will clarify the context within which proposals are brought forward, the clear policy protection at national, London and local level regarding the operation of the safeguarded wharves in the area, and more detail on the measures required so that the operation of the wharves is not prejudiced. |
| 26 | Specific Consultation Body | Mineral Products Association | The sites-Charlton | C2, C5   | The MPA objects to the proposed Site Allocations C2 and C5 within the 'Charlton Riverside'. These areas are adjacent to safeguarded wharves (Angerstein Wharf and Murphy's Wharf). While the allocations do not appear to include land within safeguarded wharf areas, future residential and mixed-use in close proximity could prejudice the existing and future operation of safeguarded wharves, including the discharge and landing of marine sand and gravel from dredgers moored on the river. The wharves   | Objection noted. The next version of the Site Allocations will clarify the context within which proposals are brought forward, the clear policy protection at national, London and local level regarding the operation of the safeguarded wharves in the area, and more detail on the measures required so that the operation of the                            |

| ID | Type of organisation                   | Name           | Section                         | Site Ref | Summary of comments  | RBG response  |
|----|--|----------------|---------------------------------|----------|--|---|
|    |  |                |                                 |          | have associated operations including processing, washing and recycling of material, concrete batching, production of asphalt and movement of material both by river and via the railhead which serve the two wharves, and of course by road. The wharves and associated industrial operations are essential in enabling and securing future sustainable supply of aggregates for construction in London, critical for the delivery of housing, commercial development and infrastructure. These sites operate on a 24-hour basis and so residential, and to a lesser extent, commercial uses in close proximity could result in introducing noise-sensitive receptors that may pose a risk of prejudicing existing and future operation of the wharves and thus the sustainable, steady and adequate supply of materials. As you will be aware, this is already a real issue on the Greenwich Peninsula. Given the importance of the wharves and the potential effect of residential and commercial development in close proximity, the Site Allocations Plan should set out in more detail the measures that will be required to be incorporated into any development on Allocated Sites C2 and C5. | wharves is not prejudiced.  |
| 27 | Agent representing business/ landowner | Morden College | The sites - Greenwich Peninsula | GP2      | Morden College own all of the land within site GP2 and also the land and property directly to the north and east of the site. The site is proposed to be allocated for 'mixed use' which we would suggest is vague and does not adequately reflect the uses proposed for the site as set out in the Core Strategy or the 2012 Peninsula West Masterplan SPD. For example, Policy EA3 in the Core Strategy which applies to the former Tunnel Glucose Wharf indicates the following: 'A new urban quarter will be created at Greenwich Peninsula West as shown on the Proposals Map as a Strategic Development Local (SDL). The SDL will include a range of uses including residential and commercial. In addition, on page 26 of the SPD the appropriate use of the site is described as 'Residential Riverfront Development' which covers the entirety of the site currently shown within the indicated boundary. For these reasons we would request that 'mixed use' in the 'options for future use' is replaced by the following wording: 'Residential led mixed use development incorporating tourist, community,  | The next version of the Site Allocations will provide further detail on the appropriate mix of uses for the site, having reference to those proposed in the response as well as to the Core Strategy and Greenwich Peninsula West Masterplan SPD, as appropriate. |

| ID | Type of organisation                   | Name                             | Section                         | Site Ref | Summary of comments   | RBG response  |
|----|--|----------------------------------|---------------------------------|----------|---|---|
|    |  |                                  |                                 |          | commercial, and retail plus riverside public open space and walk'.  |   |
| 27 | Agent representing business/ landowner | Morden College                   | The sites - Greenwich Peninsula | GP2      | We also note that as the GLA Safeguarded Wharves Review proposes to remove the safeguarded wharf status of Morden Wharf this further supports the opportunity to bring forward the wider site as part of a coherent vision.   | The next version of the allocations will reflect the status of the Mayor's Safeguarded Wharves review at the time of publication.   |
| 27 | Agent representing business/ landowner | Morden College                   | The sites - Greenwich Peninsula | GP2      | We note the boundary for site GP2 does not include the area of land between the site and Tunnel Avenue to the north east. This is inconsistent with the GPWM SPD which shows this area as being suitable for redevelopment for education and community uses (pages 22 and 82). In addition, we note this area also falls within the area covered by policy EA3 in the Core Strategy and therefore would be appropriate to include within the allocated site. In terms of access to site GP2, we would also highlight that the boundary fails to recognise that access to the site must be from Tunnel Avenue not from Enderby Wharf to the south, as the Enderby Wharf scheme does not make provision for a major access to Morden Wharf. For these reasons we would request that the boundary of site GO2 is amended as shown in in Appendix A to this letter which deals with these issues and enables a more meaningful vision for the site to be brought forward. | The draft London Plan and associated evidence base (London Industrial Land demand Study, 2017) identifies Greenwich as a 'retain capacity' borough for the purposes of industrial land management. While the Issues and Options consultation suggested that the Site Allocations may consider revising SIL boundaries (albeit specific to one site in the Thamesmead area), this is not supported by the most up-to-date evidence. The 2012 Employment Land Review that informed the SIL release taken forward through the Core Strategy with Detailed Policies revised SIL boundaries in the Greenwich Peninsula West area, and the Inspector's report on the Core Strategy with Detailed Policies did not recommend that SIL boundaries be reviewed further during the preparation of the Site Allocations Local Plan. Therefore the Site Allocations Local Plan will not seek to revise SIL boundaries as there is no justification for doing so. Existing London Plan and Core Strategy policies provide sufficient guidance regarding development within SILs. Access will be considered in more detail in the next version of the allocation. |
| 28 | Agent representing business/           | Operators, Angerstein & Murphy's | The sites- Charlton             | C2       | Object to the inclusion of residential and other potentially noise sensitive uses (schools) on this site. This is on the basis that it is in close proximity to active areas within the safeguarded wharves site  | Objection noted. The retail development within the C2 site is relatively recent and the 2017 Charlton Riverside SPD indicative  |

| ID | Type of organisation                   | Name   | Section             | Site Ref | Summary of comments  | RBG response  |
|----|--|--|---------------------|----------|--|---|
|    | landowner                              | Wharves c/o Firstplan                                  |                     |          | and could prejudice the existing and future operation of the wharf sites. The Charlton Riverside SPD envisaged only retail uses in this location. There may be potential to introduce a buffer zone within this allocation – which may allow for residential on the southern half of the site. However, this would need to be reviewed in detail before support could be given.  | phasing for this area beyond 2031. Because the phasing in the SPD is outside the plan period, site C2 will not be included in the next version of the Site Allocations. This area of Charlton Riverside is more appropriately considered as part of Local Plan review.  |
| 28 | Agent representing business/ landowner | Operators, Angerstein & Murphy's Wharves c/o Firstplan | The sites- Charlton | C5       | Object to the inclusion of residential or other noise sensitive uses on this site. This is unless, specific reference is made within the allocation that a buffer zone and/or other detailed consideration must be given to the siting, design and layout of the proposals and their inter-relationship with the nearby wharf uses. This is on the basis that whilst proposed site allocation C5 is located further away from the Safeguarded Wharves than either C1 or C2 it does have open views toward the Murphy's Wharf river unloading facility which operates 24 hours a day 7 days a week unloading sea-dredged material.  | Objection noted. The next version of the Site Allocations will clarify the context within which proposals are brought forward, and the clear policy protection at national, London and local level regarding the operation of the safeguarded wharves in the area and the referenced requirements regarding not prejudicing the operation of the safeguarded wharves. |
| 28 | Agent representing business/ landowner | Operators, Angerstein & Murphy's Wharves c/o Firstplan | The sites- Charlton |          | It is noted that no specific further allocation of the safeguarded wharves is proposed within the Charlton section of the Issues and Options consultation. The introductory text to the consultation document states that the document is dealing only with new allocations or taking forward Strategic Allocations already identified in broader terms in the Core Strategy. As highlighted in the policy summary above the two wharf sites are subject to the following specific allocations in the Core Strategy: Safeguarded wharf, rail freight site, waste management site, protected aggregates zone, SIL. In this context Para 5.11 of the consultation document confirms “These designation and safeguarding are protected through the Core Strategy and are therefore not reviewed further in this document. However, it is considered critical that in moving forward the Site Allocations document must in the section dealing with allocations in Charlton (which are focused entirely on Charlton Riverside) deal comprehensively with the context in which those allocations are to be taken forward and the context in which any planning applications on those sites are to | Objection noted. The next version of the Site Allocations will clarify the context within which proposals are brought forward, and the clear policy protection at national, London and local level regarding the operation of the safeguarded wharves in the area.  |

| ID | Type of organisation                   | Name   | Section             | Site Ref | Summary of comments   | RBG response  |
|----|--|--|---------------------|----------|---|---|
|    |  |  |                     |          | be considered.  |   |
| 28 | Agent representing business/ landowner | Operators, Angerstein & Murphy's Wharves c/o Firstplan | The sites- Charlton |          | Land south of Murphy's Wharf and north of Bugsby's Way / site allocation C2. Whilst this area has no proposed allocation, for avoidance of doubt it is confirmed that there would be an objection to any proposed change in n this current situation and the introduction of any potential for residential or other noise sensitive uses.   | It is not proposed to allocate this area.   |
| 28 | Agent representing business/ landowner | Operators, Angerstein & Murphy's Wharves c/o Firstplan | The sites- Charlton | CI       | Support the appropriate proposed allocation of site for industrial uses. Any other non-industrial uses would be resisted in this location.  | Support for industrial use noted. Existing London Plan and Core Strategy policies provide sufficient guidance regarding development within SILs, and this site will therefore not be included in the next version of the Site Allocations.  |
| 28 | Agent representing business/ landowner | Operators, Angerstein & Murphy's Wharves c/o Firstplan | The sites- Charlton |          | The following objection to the Site Allocations – Issues and Options Consultation has been prepared on behalf of the four operators located at the Safeguarded Angerstein and Murphy's Wharves, within Charlton Riverside. The operators are as follows: Aggregate Industries (Angerstein Wharf); Cemex (Angerstein Wharf); Tarmac (Murphy's Wharf); and Day Group (Murphy's Wharf). Jointly the operators run a number of aggregate related industrial operations from the two safeguarded wharves which are located within a defined “aggregates zone” in the Core Strategy. These activities include: processing, washing and recycling of material, concrete batching, production of asphalt and movement of material both by river and via the railhead which serve the two wharves, and of course by road. A Site Boundaries and Activities Plan has been produced by Tarmac and is attached at Document 1 to this letter. Details of the main operations and activates carried out by each operator are attached at Document 2 to this letter. On the basis of the intensive 24/7 operation of the aggregates zone the operators' key concern with regard to the Site Allocations Issues and Options Consultation document is with the potential that noise sensitive receptors (principally as a result of proposed housing allocations) will be introduced in close proximity to their operations. | Objection noted. The next version of the Site Allocations will include the requirement that the introduction of noise sensitive receptors in proximity to the safeguarded wharves does not compromise the 24 hour operation of the wharves. |

| ID | Type of organisation                   | Name   | Section             | Site Ref | Summary of comments   | RBG response   |
|----|--|--|---------------------|----------|---|--|
| 28 | Agent representing business/ landowner | Operators, Angerstein & Murphy's Wharves c/o Firstplan | The sites- Charlton |          | The four operators at Angerstein and Murphy's Wharf have key concerns regard the proposed introduction of residential and other noise sensitive uses in close proximity the safeguarded wharves. The specific objection to the consultation document have been outlined above in the context of the comprehensive and many layered policy protection which the two wharves are afforded. We would welcome further discussion with the LPA ahead of the next consultation stage and would be happy to meet to discuss further should that be of assistance.  | Objection noted, and offer of further discussion welcomed. The outcomes of any discussion would be reflected in the next version of the Site Allocations as appropriate.   |
| 28 | Agent representing business/ landowner | Operators, Angerstein & Murphy's Wharves c/o Firstplan | The sites- Charlton |          | The Site Allocations Plan for Charlton Riverside (Fig 5.15) has been annotated with the extent of the four operator sites at Angerstein and Murphy's Wharves and is attached at Document 3. This serves to highlight the context for the consideration of those allocations in closest proximity to the safeguarded wharves, namely proposed allocations C1, C2 and C5. A response to each of those proposed allocations is set out within the table below.   | Location and extent of operations noted.   |
| 28 | Agent representing business/ landowner | Operators, Angerstein & Murphy's Wharves c/o Firstplan | The sites- Charlton |          | The specific allocation sites which raise concern for the Operators are detailed below, together with confirmation of the need for the document to provide a very clear contextual analysis of the surrounding uses within which those allocations are to be brought forward. In short, it must give comprehensive consideration of the operations and activities on the Safeguarded Wharves. Ahead of that, a review of the key policy protection which applies to the land under the control of the safeguarded wharves operators is set out below [representation refers to NPPF para 143, London Plan Policies 5.20 and 6.14, Mayor's Safeguarded Wharves Review, RBG Core Strategy and 2012 Charlton Riverside SPD; all relevant to safeguarding of wharf operations]. This policy protection underpins the objection to the proposed Site Allocations document that it should not introduce uses which could prejudice the operation of the safeguarded wharf, rail and aggregate related uses. | Objection noted. The next version of the Site Allocations will clarify the context within which proposals are brought forward, and the clear policy protection at national, London and local level regarding the operation of the safeguarded wharves in the area. |
| 28 | Agent representing business/ landowner | Operators, Angerstein & Murphy's Wharves c/o           | The sites- Charlton |          | There are range of office and light industrial uses surrounding the safeguarded wharves sites which could potentially take advantage of the extended and new permitted development rights. It is considered that any such proposal located in close proximity to  | Permitted development rights are outside the scope of the Site Allocations   |

| ID | Type of organisation                   | Name   | Section                              | Site Ref | Summary of comments  | RBG response  |
|----|--|--|--------------------------------------|----------|--|---|
|    |  | Firstplan  |                                      |          | the safeguarded wharves would fail the new tests in terms of noise for change of use from office to residential, and in terms of impact on an important industrial area and the sustainability of those provisions in the context of change of use from light industrial to residential. For all of the policy and operational reasons outlined above the wharf operators would be highly resistant to any proposal seeking to make use of the above PD rights in close proximity to their sites. Whilst not technically something for consideration under the auspices of this Issues and Options consultation the wharf operators are keen to highlight at this stage that they would be looking to the London Borough of Greenwich to begin work on securing Article 4 directions to cover an appropriate buffer zone around the safeguarded wharves.   |   |
| 28 | Agent representing business/ landowner | Operators, Angerstein & Murphy's Wharves c/o Firstplan | The sites- Charlton                  |          | There must be more detailed and express reference to the operations and activities on the two wharves, the level of policy protection they are subject to and confirmation that any planning applications coming forward in the context of the Site Allocations will need to have due regard to ensuring they do not prejudice the existing or future operations of the wharves by way of: Siting, layout and design; Noise or Air Quality considerations; Lighting; Transport and Access; and by Ensuring early engagement with the wharf operators' as appropriate. Comprehensively dealing with the context of the proposed Site Allocations has the dual purpose of ensuring the safeguarding of the operation of the wharves whilst also providing a clear steer to future applicants in terms of what will be required in progressing their planning applications. This should hopefully avoid the need for the wharf operators to make objections to any forthcoming planning applications – which could potentially slow up the delivery of the regeneration of the area which comprises a key planning objective. | The next version of the Site Allocations will include the referenced requirements in relation to not prejudicing operation of the safeguarded wharves.  |
| 29 | Business/ landowner                    | Peabody Trust  | The sites- Thamesmead and Abbey Wood | T7       | Concur with the proposed future use of this site being a residential-led mixed use development with scope for some ground floor retail uses. It is misleading and inappropriate that part of the site is described as a “mature wooded area” for which   | Included in Issues and Options as part of Thamesmead Housing Zone. Site contains housing office, playspace, allotments and a wooded area. The playspace and allotments are well-used and would need to be |



| ID | Type of organisation | Name          | Section                              | Site Ref | Summary of comments   | RBG response   |
|----|----------------------|---------------|--------------------------------------|----------|---|--|
|    |                      |               |                                      |          | protection is encouraged.   | reprovided as part of any redevelopment. Existing policies provide sufficient guidance regarding development of the site. This site has been deleted from the Site Allocations   |
| 29 | Business/ landowner  | Peabody Trust | General comments                     |          | <p>Endorses the allocation of Peabody sites proposed for (mostly residential) development in the SAP.</p> <p>Identifies some sites or areas where there is scope for (again, mostly residential) development, so as to identify that future potential at this early stage. Some of these sites are 'deliverable' within the next 5 years and most are 'developable' within 15 years, albeit Peabody is not in a position to advance them as Site Allocations at this stage in the SA process. WHERE ARE these identified, and what is meant by not being in a position to advance them as site allocations (is this a reference to not being presently able to develop in accordance with the allocated uses/s?)</p> <p>Section of submission headed Issues and Options discusses housing, economy and employment, retail and town centres, green infrastructure, transport, community and social infrastructure, education, health and wellbeing, and sustainable waste management, but in a strategic sense, and thus this discussion relates to the core strategy rather than to specific allocations.</p> <p>One specific objection in this discussion is to the perceived prescriptiveness of the proposed setbacks to the Thames.</p> | <p>Noted, although sites currently designated as SIL have been deleted from the Site Allocations. The draft London Plan and associated evidence base (London Industrial Land demand Study, 2017) identifies Greenwich as a 'retain capacity' borough for the purposes of industrial land management. While the Issues and Options consultation suggested that these sites could be considered for release from its SIL designated, this is not supported by the most up-to-date evidence. The 2012 Employment Land Review that informed the SIL release taken forward through the Core Strategy with Detailed Policies did not recommend revisions to SIL boundaries in the Thamesmead area, and the Inspector's report on the Core Strategy with Detailed Policies did not recommend that SIL boundaries be reviewed during the preparation of the Site Allocations Local Plan.</p> |
| 29 | Business/ landowner  | Peabody Trust | The sites- Thamesmead and Abbey Wood | T3       | <p>Peabody considers sites T3 Tripcock Point school site, T5 Tripcock Park East and West and T6 Tripcock Point should be treated as one comprehensive residential-led mixed use allocation, including the proposed primary school and district park uses identified, as well as associated retail, commercial and other community uses. This would allow the Sas to provide a framework for a future masterplanning of Tripcock Point without restricting uses to zones which reflect historic unimplemented planning permissions.</p>  | <p>T3, T5 and T6 are now included as one site allocation; T3 Thamesmead Waterfront.</p>  |

| ID | Type of organisation | Name          | Section                             | Site Ref | Summary of comments   | RBG response   |
|----|----------------------|---------------|-------------------------------------|----------|---|--|
|    |                      |               |                                     |          | <p>The size of both the school and district park need to be informed by assessments of education and green infrastructure needs.</p> <p>NOTE: Submission has a second part, setting out in track changes format Peabody's requested changes to the Abbey Wood-Thamesmead allocations table at pages 75-77 of the draft SPD. These changes essentially reflect the changes suggested in the main part of the submission, as detailed site by site in this database.</p>  |  |
| 29 | Business/landowner   | Peabody Trust | The sites-Thamesmead and Abbey Wood | AW1      | Peabody owns much of the land around this site allocation, along Harrow Manorway, and has plans for increases in development density. The Cross Quarter site (which has planning permission) should be included in this site allocation.  | The Site boundary has been amended. The revised site is T6: Cross Quarter and Lydean Industrial Estate |
| 29 | Business/landowner   | Peabody Trust | The sites-Woolwich                  | W7       | Peabody welcomes this designation as it intends to develop the site in a way consistent with the vision set out in the Spray Street SPD Masterplan  | Comment noted  |
| 29 | Business/landowner   | Peabody Trust | The sites-Thamesmead and Abbey Wood | T11      | Sites T10 and T11 should be treated as one allocation, consistent with their Peabody ownership and planning history. This would facilitate an integrated comprehensive redevelopment, including the provision of better quality open space.   | T10 and T11 are now included as one site allocation; T1 Broadwater Dock                                |
| 29 | Business/landowner   | Peabody Trust | The sites-Thamesmead and Abbey Wood | T10      | Sites T10 and T11 should be treated as one allocation, consistent with their shared Peabody ownership and planning history. This would facilitate an integrated comprehensive redevelopment, including the provision of better quality open space.  | T10 and T11 are now included as one site allocation; T1 Broadwater Dock                                |
| 29 | Business/landowner   | Peabody Trust | The sites-Thamesmead and Abbey Wood | T5       | Sites T3 Tripcock Point school site, T5 Tripcock Park East and West and T6 Tripcock Point should be treated as one comprehensive residential-led mixed use allocation, including the proposed primary school and district park uses identified, as well as associated retail, commercial and other community uses. This would allow the SAs to provide a framework for a future masterplanning of Tripcock Point without restricting uses to zones which reflect historic unimplemented planning permissions. | T3, T5 and T6 are now included as one site allocation; T3 Thamesmead Waterfront.                       |

| ID | Type of organisation | Name          | Section                              | Site Ref | Summary of comments  | RBG response   |
|----|----------------------|---------------|--------------------------------------|----------|--|--|
|    |                      |               |                                      |          | The size of the school and district park need to be informed by assessments of education and green infrastructure needs.   |  |
| 29 | Business/ landowner  | Peabody Trust | The sites- Thamesmead and Abbey Wood | T6       | <p>Sites T3 Tripcock Point school site, T5 Tripcock Park East and West and T6 Tripcock Point should be treated as one comprehensive residential-led mixed use allocation, including the proposed primary school and district park uses identified, as well as associated retail, commercial and other community uses. This would allow the SAs to provide a framework for a future masterplanning of Tripcock Point without restricting uses to zones which reflect historic unimplemented planning permissions.</p> <p>The size of the school and the district park need to be informed by assessments of education and green infrastructure needs.</p> | T3, T5 and T6 are now included as one site allocation; T3 Thamesmead Waterfront.   |
| 29 | Business/ landowner  | Peabody Trust | The sites- Thamesmead and Abbey Wood | T8       | <p>Support the proposed residential allocation of this site but reference should be amended to 'residential-led'.</p> <p>Disagree with the reference made to a 'potential SINC' and claims the site is dominated by species-poor semi-improved grassland of limited ecological value.</p> <p>NOTE: Submission has a second part, setting out in track changes format Peabody's requested changes to the Abbey Wood- Thamesmead allocations table at pages 75-77 of the draft SPD. These changes essentially reflect the changes suggested in the main part of the submission, as detailed site by site in this database.</p>                             | <p>This site has been deleted from the Site Allocations as the development has been completed.</p> <p>Planning permission 16/2163/F granted in May 2017 for 66 residential units and flexible commercial/community floorspace.</p>   |
| 29 | Business/ landowner  | Peabody Trust | The sites- Thamesmead and Abbey Wood | T9       | <p>Support the residential-led mixed use allocation proposed and concur with the release of SIL land this entails</p> <p>However, the ownership boundary is not a clear nor is there a defensible site boundary, as the proposed boundary splits the area of land inside the Pettman Crescent gyratory. There is logic for allocating the whole of Trade Park and the bus depot within the Pettman Crescent 'triangle' site, and this approach would be</p>  | T9 boundary has been revised to include the entire Pettman Crescent Gyratory Island and to exclude the SIL to the east. Part of site to the east of eastern arm of Pettman Crescent gyratory is within Strategic Industrial Land (SIL). The draft London Plan and associated evidence base (London Industrial Land demand Study, 2017) |

| ID | Type of organisation        | Name                     | Section                              | Site Ref | Summary of comments  | RBG response   |
|----|-----------------------------|--------------------------|--------------------------------------|----------|--|--|
|    |                             |                          |                                      |          | consistent with the Plumstead Urban Framework. However, this is matter for Council to consider with the site owners.   | identifies Greenwich as a 'retain capacity' borough for the purposes of industrial land management. While the Issues and Options consultation suggested that the site could be considered for release from its SIL designated, this is not supported by the most up-to-date evidence. The 2012 Employment Land Review that informed the SIL release taken forward through the Core Strategy with Detailed Policies did not recommend revisions to SIL boundaries in the Thamesmead area, and the Inspector's report on the Core Strategy with Detailed Policies did not recommend that SIL boundaries be reviewed during the preparation of the Site Allocations Local Plan. |
| 29 | Business/ landowner         | Peabody Trust            | The sites- Thamesmead and Abbey Wood | T2       | <p>Wording to be revised to suggest a mixed-use development with a strong focus on community provision.</p> <p>NOTE: Submission has a second part, setting out in track changes format Peabody's requested changes to the Abbey Wood- Thamesmead allocations table at pages 75-77 of the draft SPD. These changes essentially reflect the changes suggested in the main part of the submission, as detailed site by site in this database.</p> | T2 has been expanded to include the existing library / leisure centre; it is now T5 Thamesmere Civic Site and is allocated for mixed-use development to include community provision (expansion / reconfiguration of leisure centre and library) with residential above.  |
| 30 | General Consultation Bodies | Port of London Authority | The sites- Charlton                  | C3       | Site Allocation C3 includes land and a building that the PLA leases from the Environment Agency. The terms of the lease mean that there is no reasonable prospect that it will be available for and could be developed within the next 15 years. The land and building utilised by the PLA should therefore be removed from the site allocation.   | Site allocation C3 was included in the Issues and Options as safeguarding for flood defences. The Environment Agency has since confirmed that their requirement for the part of the site in their ownership is for storage of flood equipment as well as flood defences. It is agreed that there is no reasonable prospect that this site will be available for development in the plan period and it will not be included in the next   |

| ID | Type of organisation        | Name                     | Section                             | Site Ref | Summary of comments  | RBG response  |
|----|-----------------------------|--------------------------|-------------------------------------|----------|--|---|
|    |                             |                          |                                     |          |  | version of the Site Allocations.  |
| 30 | General Consultation Bodies | Port of London Authority | The sites-Charlton                  | C1       | The allocation of site C1 for industrial use is in principle welcomed, providing a buffer between the activities that take place at the bargeworks and Angerstein and Murphys wharves and the proposed mixed use development identified for site C5.   | Support for industrial use noted. Existing London Plan and Core Strategy policies provide sufficient guidance regarding development within SILs, and this site will therefore not be included in the next version of the Site Allocations.  |
| 30 | General Consultation Bodies | Port of London Authority | The sites-Charlton                  | C2, C5   | The allocations for sites C2 and C5 would result in sensitive uses (residential and education) surrounding the wharves. As the Royal Borough of Greenwich will be aware through the processing of applications for phases 3, 4 and 5 of Greenwich Millennium Village there are complex technical issues that must be addressed when residential development is proposed is close proximity to a safeguarded wharf. The key issues that must be considered are site layout and design, noise, air quality, lighting, transport and access. This includes the low frequency noise generated by the dredgers at Angerstein and Murphy's Wharves which has been found to require specific consideration and mitigation. The Site Allocations document provides the opportunity to give a clear steer to the developers of sites C2 and C5 of the issues that must be addressed when bringing their sites forward. The Site Allocations for C2 and C5 must therefore include additional text under "Options for future use" which specifically identifies the juxtaposition issues that must be addressed and requires early engagement with the wharf operators. The identification of the issues and early engagement with the wharf operators may assist in reducing the time taken to process any subsequent planning applications. | Further detail on the issues that must be addressed by proposals for redevelopment within C5, and the requirement to engage early with wharf operators, will be included in the next version of the site allocation. The retail development within the C2 site is relatively recent and the 2017 Charlton Riverside SPD indicative phasing for this area beyond 2031. Because the phasing in the SPD is outside the plan period, site C2 will not be included in the next version of the Site Allocations. This area of Charlton Riverside is more appropriately considered as part of Local Plan review. |
| 30 | General Consultation Bodies | Port of London Authority | The sites-Thamesmead and Abbey Wood | T5       | The site allocation for Tripcock Park East and West (T5) should be updated to make it clear that any use(s) of the land need to take account of the PLA's lighthouse at Tripcock point and ensure the PLA's access requirements are maintained (or even enhanced).   | The next version of the site allocation will include the requirement to enhance access requirements for the lighthouse at Tripcock Point.   |
| 30 | General Consultation Bodies | Port of London Authority | The sites-Greenwich town centre     | G2       | There is no reference in the Site Allocations document to the safeguarded Brewery Wharf and site G2 Creek Road, south side (Meridian Gateway) is identified in very close proximity to the   | The next version of the Site Allocations will only include those sites with planning permission where a significant amount of   |

| ID | Type of organisation        | Name                     | Section                         | Site Ref | Summary of comments   | RBG response  |
|----|-----------------------------|--------------------------|---------------------------------|----------|---|---|
|    |                             |                          |                                 |          | wharf (on the opposite side of Deptford Creek). The allocation seeks mixed use development, including residential. This site has planning consent and the site allocation needs updating to reflect this and to be consistent with the level of information provided for other Site Allocations. Detailed discussions took place concerning the juxtaposition issues associated with having development proposed in close proximity to Brewery Wharf and the issues have been addressed through the development control process. However, it would still be beneficial and consistent with the PLA's proposed approach for Charlton Riverside if the Site Allocations document identified them. | development remains to be delivered.  |
| 30 | General Consultation Bodies | Port of London Authority | General comments                |          | Transport Infrastructure - It is not possible to read the text in figure 4.I either electronically or in printed form and a number of sites appear to be shown either indicatively or actually over the river. The final version of the Site Allocations document will need to address this issue and the PLA may wish to make further representations once figure 4.I is legible.  | Figures and maps will be clarified in subsequent versions of the Site Allocations.  |
| 30 | General Consultation Bodies | Port of London Authority | General comments                |          | As highlighted in this representation there are detailed technical matters that need to be addressed when development is proposed in close proximity to wharves and waterway support infrastructure. Currently the Site Allocations document does not identify or require these matters to be addressed and amendments are therefore required to the document. The PLA would welcome the opportunity to meet with Greenwich Council to discuss all of the issues raised in this representation.   | Further dialogue with the PLA is welcomed and will be undertaken throughout the preparation of the Site Allocations.  |
| 30 | General Consultation Bodies | Port of London Authority | The Sites - Greenwich Peninsula |          | As the Council will be aware the PLA has navigational links across the Peninsula which are important in maintaining the safety of navigation on the River Thames, it would be useful if the Site Allocations document made reference to this, in order for developers to be aware of them at an early stage and of the need to discuss the matter with the PLA.   | The next version of the Site Allocations will ensure that for sites that abut the river on the Peninsula reference is made to PLA navigational links and the need to liaise with the PLA regarding these. |
| 30 | General Consultation Bodies | Port of London Authority | General comments                |          | Careful consideration needs to be given to the implications of the permitted development rights which allow a change of use from office to residential. Additionally, new permitted development rights are being introduced for a temporary period which will   | The preparation of Article 4 Directions is outside the scope of the Site Allocations.   |

| ID | Type of organisation        | Name                     | Section                         | Site Ref | Summary of comments  | RBG response   |
|----|-----------------------------|--------------------------|---------------------------------|----------|--|--|
|    |                             |                          |                                 |          | allow for a change of use from light industrial to residential. Given the extant nature of the area around the Borough's safeguarded wharves and waterway support facilities, Greenwich Council should give early consideration to the securing of Article 4 Directions to preclude these permitted development rights from being used. The PLA would be happy to meet with the Council specifically on this matter to help define the extent of the Article 4 Directions.   |  |
| 30 | General Consultation Bodies | Port of London Authority | The sites- Charlton             | C2, C5   | However, given the proximity of the bargeworks and Angerstein and Murphy's wharves to site C5 it will not completely buffer activities. For example, any residential development on the northern boundary of site C5 would have no buffering from river based activities such as dredgers discharging at Murphy's and Angerstein wharves.  | Further detail on the requirement to ensure that new development does not prejudice the operation of the safeguarded wharves, including river based activities, will be included in the next version of the site allocation.   |
| 30 | General Consultation Bodies | Port of London Authority | The sites- Woolwich             |          | It should be made clear on the Woolwich Site Allocations drawing on page 24 which site extends to the mid point of the river. It is only from looking at the more detailed plans that it is possible to see that it is site W6 Crossrail. Where there are multiple sites in close proximity to each other it would be beneficial to differentiate the sites through the use of different colours so that they can be easily identified.  | Figures and maps will be clarified in subsequent versions of the Site Allocations.   |
| 30 | General Consultation Bodies | Port of London Authority | The Sites - Greenwich Peninsula | GP2      | Site GP2 is the extant location of the safeguarded Tunnel Wharf. Table 5.3 identifies that the site is "likely to be released from safeguarding if the GLA Safeguarded Wharves Review is implemented." It is unknown when this release might happen through the Safeguarded Wharf Review and therefore it would only be appropriate to identify it for mixed use if (i) the recommendation for Tunnel Wharf was endorsed by the Secretary of State and the safeguarding Direction amended or (ii) the site allocation was extended to include the proposed boundary for Tunnel Wharf and the Site Allocations document sought one comprehensive planning application to be brought forward for the site, reactivating the wharf on the land identified in the review as the revised boundary for Tunnel Wharf and providing mixed use development on the extant location of the safeguarded Tunnel | The Mayor's recommendation for Tunnel Wharf has not yet been endorsed by the Secretary of State. Unless and until the safeguarding direction is amended, the site allocation for this site will seek one comprehensive planning application to be brought forward for the extended boundary as recommended by the PLA. |

| ID | Type of organisation        | Name                     | Section                         | Site Ref | Summary of comments  | RBG response   |
|----|-----------------------------|--------------------------|---------------------------------|----------|--|--|
|    |                             |                          |                                 |          | Wharf. See for example, Convoys Wharf where a similar approach was taken.  |  |
| 30 | General Consultation Bodies | Port of London Authority | General comments                |          | The implications of the Housing and Planning Bill also require consideration. If a site allocated for housing in the Council's Local Plan has 'permission in principle' which is the broad equivalent of an outline planning permission then how will the juxtaposition issues be addressed?   | The Site Allocations will provide a level of detail appropriate to a DPD to enable proposals to be brought forward.  |
| 30 | General Consultation Bodies | Port of London Authority | The Sites - Greenwich Peninsula |          | The safeguarded route of Silvertown Tunnel is not shown on the plans (yet they are for Crossrail in Woolwich).   | The Silvertown Tunnel safeguarding is secured by Core Strategy Policy IM3 Critical Physical Infrastructure and shown on the Policies Map.                          |
| 30 | General Consultation Bodies | Port of London Authority | The sites- Charlton             | C2       | There is also an extant Masterplan Supplementary Planning Document for Charlton Riverside and the PLA's comments on this are well documented. The Site Allocations document does not appear to accord with the current SPD which envisages commercial/retail use at site C2. It is noted that a new SPD is currently being prepared by the Council which will provide updated guidance. The PLA would wish to contribute to the production of this document and would be happy to meet with the Council specifically on this matter. | The new Charlton Riverside SPD was adopted in July 2017 and the Site Allocations for the Charlton Riverside area reflect this updated guidance.                    |
| 30 | General Consultation Bodies | Port of London Authority | The Sites - Greenwich Peninsula |          | There is also an extant Masterplan Supplementary Planning Document for Greenwich Peninsula West to guide development in this area and the PLA's comments on this are well documented. It is noted that a new SPD is currently being prepared by the Council which will provide updated guidance. The PLA would wish to contribute to the production of this document and would be happy to meet with the Council specifically on this matter.  | When adopted, the Site Allocations will replace the Greenwich Peninsula West SPD.  |
| 30 | General Consultation Bodies | Port of London Authority | The Sites - Greenwich Peninsula | GPI 3    | Whilst the wharves and Bay Wharf are protected by planning policy, a significant amount of development is proposed in extremely close proximity to them by GP2, GP4, GP9 and GPI 3. It would be useful to understand on what basis the Site Allocations have been made. For example, whilst Enderby Wharf has been allocated, the adjacent site Alcatel Lucent has not. Additionally it would be helpful if the information provided in the table was consistent. For example, in relation to GPI3 Enderby                           | The next version of the Site Allocations will only include those sites with planning permission where a significant amount of development remains to be delivered. |



| ID | Type of organisation                   | Name                           | Section             | Site Ref | Summary of comments  | RBG response  |
|----|--|--------------------------------|---------------------|----------|--|---|
|    |  |                                |                     |          | Wharf/Enderby Place reference is made to two residential buildings completed and constructed yet the reference in relation to GMV Phases 3-5 just advises the site has planning permission. Significant amounts of development have taken place at GMW with occupation of some of the residential units. Where planning permission has been granted for a site and there is a reference to planning permission, it would be useful to include the permission reference. Given that sites GP4, GP9 and GP13 all have planning permission the juxtaposition issues associated with having development proposed in close proximity to Victoria Deep Water Terminal, Tunnel Wharf and Bay Wharf have all been addressed through the development control process. However, it would still be beneficial and consistent with the PLA's proposed approach for Charlton Riverside if the Site Allocations document identified them.  |   |
| 31 | Agent representing business/ landowner | R55 c/o Colliers International | The sites- Woolwich | W12      | Object to the proposed boundary of site W12 – Arsenal Way as an Industrial Business Park. The wider area, proposed for designation, is characterised by a mixture of modern light industrial and older industrial units. However, our client is of the opinion that the current boundary is too wide. They are of the opinion that any boundary for a future IBP should be able to demonstrate an identifiable and legible boundary which takes into account quality of stock, offering fit for purpose industrial buildings which meet the needs of modern occupiers. It should therefore extend no further than Marshgate Path to the East and the land at 2 Tom Cribb Road should be removed from the proposed allocation. Our client holds this opinion because the character of the area changes significantly towards the edge of the proposed boundary. Tom Cribb Road, for example, incorporates older industrial units which are physically detached from the remainder of the proposed IBP. The area serves a different industrial market and, by virtue of proximity to nearby residential uses, is less suitable for continued use. These should therefore be removed from within the proposed designation. In some circumstances, such as at Tom Cribb Road, the sites that would be removed also | It is agreed that it is not appropriate to seek to alter SIL boundaries through the Site Allocations process and that while the vision for Woolwich set out in the Core Strategy does seek significant employment growth in the area, this is not envisaged to be delivered via the identification of a new area of SIL. The site is identified in the 2012 Employment Land Review as an important local industrial site, and recommended for designation as such. The next version of the Site Allocations will ensure that the proposed allocation is consistent with both the existing development plan and the most up-to-date evidence regarding employment land/industrial land demand. |

| ID | Type of organisation                   | Name                       | Section             | Site Ref | Summary of comments  | RBG response   |
|----|--|----------------------------|---------------------|----------|--|--|
|    |  |                            |                     |          | provide an opportunity for sustainable residential-led redevelopment. In that particular case, the area has an excellent PTAL rating (6a) and is in close proximity to Woolwich Town Centre. The land is within the Woolwich Strategic Development Location - and Mayoral Opportunity Area - where Policy H1 of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies (2014) seeks to direct new housing. The previous Woolwich Town Centre Masterplan SPD (2012) also highlighted the entirety of the proposed IBP as an area with potential to accommodate a new mixed use development. Whilst our client recognises that the Borough now seeks to protect a greater proportion of employment land, the Borough's previous aspirations also implicitly acknowledge that this can be achieved in a more flexible and mixed-use manner. |  |
| 31 | Amenity Group/ Residents Association   | RAGED                      | General comments    |          | A Petition of more than 300 local residents and a residents association collectively requested that the site of the Gaelic Athletic association Sports Ground in Avery Hill Road be included in the Site Allocations document. The request was to "Sure up" the sites current allocation as Community open space or to possibly upgrade the site to Metropolitan Open Land   | The Council acknowledges the strong feelings of the community with regards to this site. The site was allocated as community open space in the local plan and as there were no plans on removing or altering this designation it would not have been appropriate to allocate the site in this document. However, since the Issues and Options document was consulted on Planning Permission has been granted on the site on appeal following the Councils refusal. |
| 32 | Agent representing business/ landowner | Rockwell c/o Bilfinger GVA | The sites- Charlton |          | Overall, we welcome the Council's proposal to prepare a Site Allocation Local Plan document and to provide additional details to support the spatial strategy for the Charlton Riverside, set out in the adopted Core Strategy Document (2014). Policy EA2 'Charlton Riverside' within the Core Strategy designates proposed Site Allocations C4 and C5 for mixed-use development. The Charlton Riverside Masterplan Supplementary Planning Document (SPD) (2012) seeks to guide development coming forward in this area. Planning officers at the Royal Borough Greenwich (RBG) have confirmed that an updated and more detailed Charlton   | Support noted.   |

| ID | Type of organisation                   | Name                       | Section             | Site Ref | Summary of comments   | RBG response  |
|----|--|----------------------------|---------------------|----------|---|---|
|    |  |                            |                     |          | Riverside Masterplan is being prepared and consultation on this draft Masterplan is due to commence in May 2016.  |   |
| 32 | Agent representing business /landowner | Rockwell c/o Bilfinger GVA | The sites- Charlton |          | <p>In terms of Flood Risk, it is considered that the overall approach needs to be reviewed in light of the new data released by the Environment Agency. The approach needs to be consistent in terms of how these sites are classified, with the emphasis on optimising redevelopment through flood protection measures.. The document states that Site Allocations C4 and part of site C5 are in an 'extreme flood hazard' area although there does not appear to be any definition of what this area is. Figure 5.15 shows a hatched blue area encompassing Site Allocations C3 and part of site C4 but seems to be clear of site allocation C5. This could be the extreme flood hazard area but the map does not match the text in Table 5.2, which also refers to a 'Flood Risk Zone' in site allocation C3 but not the 'extreme flood hazard area'. Except for Site Allocations C6 and C10, all the (C) sites allocation are located in defended Flood Zone 3 and are shown in the Greenwich Strategic Flood Risk Assessment (SFRA) as at 'High Residual Risk Classification'. The SFRA is from 2011 but all the breach modelling along the tidal Thames has been revised by the Environment Agency with new data and maps issued in spring 2015. Therefore, any data prior to 2015 is superseded. For site allocation C4, the allocations document refers to the area as a: 'Flood storage area, free from inappropriate development, it will be able to act as a protection against flooding to neighbouring site (C5) west of Westmore Street, enabling the eastern part of site C5 to be developed to its maximum potential'. However, it does not suggest how the area will be protected, either by reducing building footprint to increase flood storage capacity and thereby reducing flood water levels or by increasing the bulk of buildings to act as barriers. The current Sites in this area are characterised by large warehouse type buildings which take up storage volume. We are not sure what is meant by 'inappropriate development' but development is extremely unlikely to reduce flood storage capacity and development in site allocation C4 certainly will not protect</p> | <p>The SFRA (Level 1 and 2) is being updated to take account of updated climate change allowances and its conclusions will be reflected in the next version of the Site Allocations. The EA have confirmed that this area is sensitive in terms of security for the operation of the Thames Barrier, and have requested that part of this area be safeguarded for storage of equipment under the TE2100 Plan. The next version of the allocation for Charlton Riverside Central will clarify how the new development should relate to Barrier Park and that the operational requirements of the Thames Barrier, as well as any site specific flood mitigation and management measures that are required across the site as a whole and in specific locations, if appropriate.</p> |

| ID | Type of organisation                   | Name                       | Section             | Site Ref | Summary of comments  | RBG response  |
|----|--|----------------------------|---------------------|----------|--|---|
|    |  |                            |                     |          | site allocation C5. In addition, site allocation C4 (as with the others) is fully protected against tidal flooding by flood defences and the only mechanism of flooding from the Thames is in the event of catastrophic failure of the defences.   |   |
| 32 | Agent representing business/ landowner | Rockwell c/o Bilfinger GVA | The sites- Charlton | C4       | <p>Rockwell raises an objection to the proposed site allocation of C4, which seeks to designate existing industrial uses for community open space. We recommend that the existing industrial sites are designated for mixed-use redevelopment and that the existing community open spaces is designated to be protected and upgraded and for flood storage capacity to be increased. The existing uses on site allocation C4 are currently split between industrial and community open space uses. The document suggests that the site should be designated for community open space use. The document identifies that should the neighbouring Royal Greenwich University Technical College (UTC) seek to extend their existing facility building over their existing playing pitches, the enlarged community open space could provide a playing pitch for students to use. Designating the industrial sites situated between Eastmoor Street and Westmoor Street for community open space would not encourage the owners of these sites to redevelop the land as there would be no commercial incentive to do so. This would be detrimental to the overall strategy and vision for the Charlton Riverside area which proposes comprehensive regeneration. We propose that the existing community open space situated within site allocation C4 is protected from redevelopment. The existing industrial uses situated between Eastmoor Street and Westmoor Street should be designated for mixed-use development, encouraging owners to bring them forward for redevelopment and provide much needed residential units and jobs to help meet the London Plan housing and employment targets. When these industrial sites come forward for redevelopment we suggest that the schemes should be designed to be well integrated into the existing community open space, providing cycle and pedestrian routes through the sites linking Westmoor Street to the existing community open space where</p> | Objection noted. The EA have confirmed that this area is sensitive in terms of security for the operation of the Thames Barrier, and have requested that part of this area be safeguarded for storage of equipment under the TE2100 Plan. The next version of the allocation for Charlton Riverside Central will clarify how the new development should relate to Barrier Park and that the operational requirements of the Thames Barrier. |

| ID | Type of organisation                   | Name                       | Section             | Site Ref | Summary of comments  | RBG response  |
|----|--|----------------------------|---------------------|----------|--|---|
|    |  |                            |                     |          | feasible. The community infrastructure levy (CIL) charge collected by RB Greenwich could enable the existing community open space (situated on proposed Site Allocations C3 and C4) to be upgraded by removing existing areas of hard standing making more efficient use of the space, providing an improved community open space for the occupiers of neighbouring properties to enjoy. Upgrading the existing community open space would enable the existing flood storage capacity to be increased, as well as incorporating a playing pitch for RG UTC students in addition to local residents to use.   |   |
| 32 | Agent representing business/ landowner | Rockwell c/o Bilfinger GVA | The sites- Charlton | C5       | Rockwell supports the land use principles of site allocation C5, which seeks to deliver a mixed-use development. However, it is considered that a robust consultation exercise should be undertaken to ensure the location of the proposed highway infrastructure encourages rather than prohibits individual sites from being redeveloped. Site allocation C5 identifies the site for mixed use development including employment/commercial, small scale retail, residential and open space, which we support in principle. However, it is considered that the requirement to deliver up to 5,000 new homes in the Core Strategy and the London Plan allocation of the Charlton Riverside Opportunity Area which promotes the optimisation of development suggests that there should be a focus on the delivery of new homes which should be explicit in any future policy text for this area. The site allocation identifies that the site should accommodate a transport route through it together with an east to west bus and cycle route, in addition to a transport interchange to the south western corner. We agree that an improved highway network is required to ensure the site is permeable as well as integrated into the wider community. Due to the multiple land owners, the proposed location of the east to west route through the site would need to be agreed following a comprehensive consultation exercise with the multiple land owners whilst preparing the Charlton Riverside Master SPD. We consider that the location of the proposed east to west route should follow the alignment of the existing public highway wherever possible, enabling individual sites to be delivered | Support noted. The 2017 Charlton Riverside SPD sets out detailed guidance on the proposed east-west route through the site, which is critical to unlocking the residential potential of the area. The next version of the allocation will set out the physical and social infrastructure requirements for the site to ensure a coordinated approach to delivery across land ownerships. |

| ID | Type of organisation                   | Name                                   | Section             | Site Ref | Summary of comments  | RBG response  |
|----|--|--|---------------------|----------|--|---|
|    |  |  |                     |          | quickly in accordance with the adopted Charlton Riverside spatial strategy. Any individual sites that are predominately designated to facilitate the delivery of transport infrastructure (e.g. deliver an east to west route) would provide no commercial incentive for the owners to redevelop the site. This could result in delays to the delivery of other sites which could be dependent upon the provision of new highway infrastructure. |   |
| 33 | Agent representing business/ landowner | Royal London Asset Management c/o Quod | The sites- Charlton | C7       | The respondent (Royal London) owns the freehold interest in the Westminster Industrial Estate (WIE) which is located within the Charlton Riverside Opportunity Area. Site Ref C7 of the Site Allocations (Local Plan) Draft Issues and Options Document falls within the WIE. The multi storey period buildings within Site Ref: C7 are largely vacant and/or derelict. The site should be allocated for residential led mixed use development.  | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use. However the land to the north, east and south of the site is designated as SIL and in active industrial/employment use. |
| 33 | Agent representing business/ landowner | Royal London Asset Management c/o Quod | The sites- Charlton | C7       | It was agreed with RBG during the Core Strategy EIP that there is a surplus of employment land in the borough (Annex 2 – Statement of Common Ground). This was also confirmed by the appointed Planning Inspector for the Greenwich Core Strategy examination (Annex 1).   | While this site was released from SIL as part of the Core Strategy adoption, the land to the north, east and south of the site is designated as SIL and in active industrial/employment use.  |
| 33 | Agent representing business/ landowner | Royal London Asset Management c/o Quod | The sites- Charlton | C7       | Para 51 of the NPPF states that ‘local planning authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in B uses classes) where there is an identified need for additional housing in that area...’ Furthermore, recently introduced permitted development rights (GPDO 2016) will allow  | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside   |

| ID | Type of organisation                   | Name                                   | Section             | Site Ref | Summary of comments   | RBG response  |
|----|--|--|---------------------|----------|---|---|
|    |  |  |                     |          | for a change in use from light industrial to residential from 2017 to support the delivery of much needed homes.  | SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use. However the land to the north, east and south of the site is designated as SIL and in active industrial/employment use.   |
| 33 | Agent representing business/ landowner | Royal London Asset Management c/o Quod | The sites- Charlton | C7       | Royal London have explored options for refurbishment and re-letting of the vacant buildings. Evidence which has been prepared by local agents Hindwoods and Cost Consultants RLB demonstrates that it would not be financially viable to bring all of the buildings back into active employment use even where unprecedented market improvements are factored in. Higher value residential uses are therefore required in order to cross subsidise retention of the employment uses. If there is no prospect of a viable mixed use development these building will shortly be taken out of use and fully decommissioned to avoid incurring increasingly expensive empty rates, maintenance, services and insurance costs etc. | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use. However the land to the north, east and south of the site is designated as SIL and in active industrial/employment use. |
| 33 | Agent representing business/ landowner | Royal London Asset Management c/o Quod | The sites- Charlton | C7       | Royal London have secured a joint venture developer partner to bring forward mixed use redevelopment of Site Ref: C7. Site Ref: C7 is therefore a suitable, available and achievable housing site which is deliverable within the Core Strategy plan period. Allocation of site C7 for employment uses only would prejudice the delivery of much needed housing.  | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment  |

| ID | Type of organisation                   | Name                                   | Section            | Site Ref | Summary of comments   | RBG response  |
|----|--|--|--------------------|----------|---|---|
|    |  |  |                    |          |   | and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use. However the land to the north, east and south of the site is designated as SIL and in active industrial/employment use.  |
| 33 | Agent representing business/ landowner | Royal London Asset Management c/o Quod | The sites-Charlton | C7       | The adopted Charlton Riverside Masterplan (2012) identifies Site Ref C7 as suitable for a mix of uses including residential. On page 20 of the Masterplan it is stated: "The historic buildings in this area will provide a rich set of mixed uses and cultural industries, artist studios and evening economy uses , which will act as a new focus for new high quality residential development, sensitively woven into the historic environment."   | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use. However the land to the north, east and south of the site is designated as SIL and in active industrial/employment use. |
| 33 | Agent representing business/ landowner | Royal London Asset Management c/o Quod | The sites-Charlton | C7       | The Greenwich UDP (2006) originally allocated Site Ref: C7 for employment uses (UDP Ref: J4) despite objections from the land owner (noted in the UDP inspectors report) stating that employment uses were not viable. The buildings within Site Ref: C7 have remained largely vacant since. The NPPF (para 22) states that 'Planning Policies should avoid long term protection of sites allocated for employment uses where there is no reasonable prospect of the site being used for that purpose' and 'Where there | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key   |



| ID | Type of organisation                   | Name                                   | Section             | Site Ref | Summary of comments  | RBG response  |
|----|--|--|---------------------|----------|--|---|
|    |  |  |                     |          | is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.'   | contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use. However the land to the north, east and south of the site is designated as SIL and in active industrial/employment use.   |
| 33 | Agent representing business/ landowner | Royal London Asset Management c/o Quod | The sites- Charlton | C7       | The London Plan Policy 4.4 requires employment land to bit 'fit for purpose' and for the efficient use of land which is surplus to industrial capacity to 'help meet strategic and local requirements for a mix of uses other uses such as housing'. Policy EA(a) of the recently Adopted Core Strategy permits non employment uses on employment sites where it can be demonstrated the existing use is no longer viable.   | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use. However the land to the north, east and south of the site is designated as SIL and in active industrial/employment use. |
| 33 | Agent representing business/ landowner | Royal London Asset Management c/o Quod | The sites- Charlton | C7       | The multi storey period buildings within Site Ref: C7 are generally in a poor state of repair and are largely vacant and/or derelict. Despite years of active and sustained marketing by local agents Hindwoods only 16 of the 60+ units are presently occupied (29% of floorspace) of which only 6 (10%) are occupied on leases which have not expired. The units which are occupied are let on below market rents which do not cover the costs associated with maintaining the buildings and site infrastructure. These buildings are, as a consequence, currently a loss making liability for Royal | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings   |

| ID | Type of organisation                   | Name                                   | Section             | Site Ref | Summary of comments  | RBG response  |
|----|--|--|---------------------|----------|--|---|
|    |  |  |                     |          | London. A number of the units are presently incapable of being re-occupied for industrial or other employment uses. The units which are vacant but remain technically capable of re-occupation are generally unsuitable for the majority of modern industrial and/or creative uses due to the poor quality of the urban environment/ infrastructure and lack of basic facilities (i.e loading capability).   | makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use. However the land to the north, east and south of the site is designated as SIL and in active industrial/employment use.   |
| 33 | Agent representing business/ landowner | Royal London Asset Management c/o Quod | The sites- Charlton | C7       | The RBG Core Strategy proposes 3,500 – 5,000 homes within the Charlton Strategic Development Location (Policy EA2). The majority of these homes are expected to be delivered in Site Ref: C5. This site comprise a number of complex ownerships including land at the Ashleigh Industrial Estate which recently achieved planning consent on appeal for industrial sheds (APP/E5330/A/2/2188179). This casts doubt of the ability of site C5 to deliver the required homes in the plan period. The latest London Plan AMR (AMR 12) confirms that RBG only delivered 1,372 homes against a London Plan target of 2,529 (54%) in the last monitoring year.   | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use. However the land to the north, east and south of the site is designated as SIL and in active industrial/employment use. |
| 33 | Agent representing business/ landowner | Royal London Asset Management c/o Quod | The sites- Charlton | C7       | The site is also considered more suited to mixed use development by virtue of its double sided park frontage and relative separation from the more intense industrial uses. Detailed matters relating to the quantum of employment floorspace to be re-provided and appropriate separation from the wider industrial estate should will be dealt with through the detailed design process accompanied informed by supporting technical assessments and should ultimately agreed through the planning application process. This conclusion was supported by the Planning Inspector Independently appointed to review the Greenwich Core Strategy (Annex I). | The next version of the Site Allocations will reflect the potential for introducing some residential use to the site alongside intensified employment use, within the context of heritage-led regeneration. This is consistent with the 2017 Charlton Riverside SPD. The Charlton Riverside Employment and Heritage Study (2017) sets out the key contribution that this cluster of buildings makes to the heritage of the area, and also   |

| ID | Type of organisation                   | Name   | Section                              | Site Ref | Summary of comments  | RBG response  |
|----|--|--|--------------------------------------|----------|--|---|
|    |  |  |                                      |          |  | that a good majority of businesses already in Charlton Riverside are capable of being accommodated in premises where they are mixed with residential use. However the land to the north, east and south of the site is designated as SIL and in active industrial/employment use. |
| 34 | Agent representing business/ landowner | Sabreleague Lyndean c/o Nathaniel Lichfield & Partners | The sites- Thamesmead and Abbey Wood | AW1      | Fully support and endorse the option for future residential use of site AW1 as recommended in Table 5.5 of the Issues and Options Consultation.  | Support Noted   |
| 35 | Specific Consultation Body             | Scotia Gas Networks and National Grid                  | The sites - Greenwich Peninsula      | GP3      | Although SGN and National Grid would like to see the allocation of the Greenwich Peninsular West Gasholder site for higher value residential uses within the emerging Local Plan: Site Allocations Issues and Options Consultation Document (2016) we do not believe that the timescales for the adoption of this document are in line with the aspirations for the redevelopment of the Greenwich Peninsular West area and the need to incentivise redevelopment of the Gasholder. In light of the overall development timescales for the Greenwich Peninsular West and the impact that the Gasholder has on delivery of development in the area, we believe that timely resolution of the development capacity at this site and the appropriate land uses is necessary. An 18 month window appears to be too long. As it will be at least another 18-20 months until the adoption of the Site Allocations Document, we believe these timescales will delay the redevelopment of the Greenwich Peninsular West area. As mentioned above the Gasholder site does have an impact on the development potential of surrounding land uses by virtue of the restrictions set out in the HSE's land use planning methodology (PADHI). We believe the redevelopment of the area should not be stalled further, pending the adoption of the Local Plan: Site Allocation Document. As such, in order to gain momentum and pro-actively plan for the redevelopment of the area, we propose | The next version of the allocation will reflect the planning brief for the site adopted in 2017.  |

| ID | Type of organisation       | Name                                  | Section                         | Site Ref | Summary of comments   | RBG response   |
|----|----------------------------|---------------------------------------|---------------------------------|----------|---|--|
|    |                            |                                       |                                 |          | that a Development Brief is prepared for the Gasholder site.  |  |
| 35 | Specific Consultation Body | Scotia Gas Networks and National Grid | The sites - Greenwich Peninsula | GP3      | The site (approximately 3.37 hectares) includes a single gasholder to the south west of the Greenwich Peninsular West. The Greenwich Peninsula will be the focus of the majority of development in the Borough over the plan period from 2013-2028. However, these strategic aspirations are heavily dependent on the revocation of the Hazardous Substance Consent currently attached to the site. SGN and National Grid have identified scope for the gasholder to be decommissioned. Given the previous uses of the site, there are certain requirements upon SGN and National Grid to remediate the site should the current operations halt. These works, alongside dismantling of associated infrastructure, can result in significant costs, which in turn require value from future land uses, such as residential and retail, to fund this process. SGN and National Grid is undergoing a strategic review of their portfolios owing to the OFGEM requirement to decommission obsolete terrane gas storage facilities in favour of a subterranean pipe network. This will result in a number of gasholder sites across the country becoming available for development. As such we believe that Greenwich Council should be proactively planning for this event. | Prior notification for the demolition of non-operational gasholder and associated structures was approved 12/04/18   |
| 35 | Specific Consultation Body | Scotia Gas Networks and National Grid | The sites - Greenwich Peninsula | GP3      | This draft proposed allocation is a positive change from the previous education and open space uses as it allows for a greater degree of flexibility for potential alternative, higher value uses on the site. However, it still does not provide enough certainty for the redevelopment of the site to be viable and we are concerned by the conditional nature of the allocation “only if noise and air quality issues can be resolved”. They can be resolved with appropriate design and this wording should be removed.   | The Issues and Options consultation identified options for future use as employment (B-use) and mixed use, including residential, subject to revocation of hazardous substances consent. The consultation did not propose continuation of the GPWM SPD's approach to the site. The next version of the allocation will reflect the planning brief for the site adopted in 2017. It is appropriate to refer to constraints such as air quality and noise within the allocation. |
| 35 | Specific Consultation Body | Scotia Gas Networks and National      | The sites - Greenwich Peninsula | GP3      | Within this Greenwich Peninsular West Masterplan SPD (2012) the existing Gasholder site has been identified as being potentially suitable for education and public open space uses (as shown  | The Issues and Options consultation identified options for future use as employment (B-use) and mixed use,   |

| ID | Type of organisation                   | Name             | Section             | Site Ref | Summary of comments  | RBG response   |
|----|--|------------------|---------------------|----------|--|--|
|    |  | Grid             |                     |          | below). It therefore forms some context of Greenwich Council's vision for this site. GN and National Grid were not in a position to engage within the Greenwich Peninsular West Masterplan SPD (2012) consultation process at that time, it is our opinion that the uses proposed within the 2012 SPD are wholly unrealistic and undeliverable and do not conform with London Plan Policies regarding Hazardous Installations. A blanket allocation for educational use or public open space, such as that within the Greenwich Peninsular West Masterplan SPD (2012), is not considered appropriate. The Greenwich Peninsular West Masterplan SPD (2012) does not take account of the need to incentivise and fund decommissioning and fails to give regard to the costs associated with remediation alongside dismantling of associated infrastructure and the need to bring forward future land uses to fund this process as required by the London Plan (Policy 5.22). Against this backdrop, it is considered that the emerging Greenwich Site Allocations Issues and Options Consultation Document (2016) needs to proactively address the requirements of the adopted London Plan (FALP 2015) and NPPF (2012), and incentivise SGN and National Grid to decommission and revoke the existing HSC. | including residential, subject to revocation of hazardous substances consent. The consultation did not propose continuation of the GPWM SPD's approach to the site. The next version of the allocation will reflect the planning brief for the site adopted in 2017. |
| 36 | Agent representing business/ landowner | Spenhill c/o NLP | The sites- Woolwich | W13      | Spenhill own the Woolwich Central Phase 4, and fully support the continued allocation of mixed use development including residential, retail and business/employment, thereby enabling residential-led mixed use development on the Woolwich Central Phase 4 site. The site is in a highly sustainable town centre location where high density development is suitable and appropriate. This is fully supportive of the Council's objective of establishing Woolwich as a Metropolitan Centre (Issues and Options Consultation para. 5.6) and capitalising on the arrival of Crossrail in 2018.  | Support noted.   |
| 37 | General Consultation Bodies            | Sports England   | General comments    |          | Sport England stress their position as a statutory consultee on any forthcoming application on a site that would contain land that would constitute a playing field.   | Comment Noted  |
| 37 | General                                | Sports           | General             |          | Sport England welcomes the inclusion of green infrastructure and   | The recommendations of the Playing Pitch   |

| ID | Type of organisation                   | Name               | Section             | Site Ref | Summary of comments  | RBG response   |
|----|--|--------------------|---------------------|----------|--|--|
|    | Consultation Bodies                    | England            | comments            |          | social and community infrastructure section, however Sport England recommends that indoor and outdoor sports facility needs are specifically mentioned (as identified within the Greenwich PPS and sports facility strategy).  | Strategy (2015) and the Sports Facilities Strategy (2015) have informed the assessment of sites for inclusion in the Preferred Approach document and, where relevant, the details of the proposed allocations.'  |
| 37 | General Consultation Bodies            | Sports England     | General comments    |          | Sport England would recommend that this section (3.6) is amended to include the Greenwich Playing Pitch Strategy. Recommendations (particularly policy recommendations and site specific actions should be addressed by this document and where relevant sites should be allocated to meet the identified needs, in line with Paragraph 73 of the NPPF.  | The recommendations of the Playing Pitch Strategy (2015) and the Sports Facilities Strategy (2015) have informed the assessment of sites for inclusion in the Preferred Approach document and, where relevant, the details of the proposed allocations.' |
| 37 | General Consultation Bodies            | Sports England     | General comments    |          | Sports England have identified that 19 of the proposed sites could potentially include existing sports facilities. The loss of Sports facilities and Land along with access to natural resources would be contrary to Planning Policy objective 1 within Sport England's Land Use Policy Statement.  | The presumption against building on open space/playing fields and the loss of sports land/facilities has informed the assessment of sites for inclusion in the Preferred Approach document and, where relevant, the details of the proposed allocations. |
| 37 | General Consultation Bodies            | Sports England     | General comments    |          | Sports England would object to any allocation that did not comply with Paragraph 74 of the NPPF, which includes a strong presumption against building on open space, Planning policy objective 1 within Sports England's Land Use Planning Policy Statement and its playing fields policy.   | The presumption against building on open space/playing fields and the loss of sports land/facilities has informed the assessment of sites for inclusion in the Preferred Approach document and, where relevant, the details of the proposed allocations. |
| 38 | Agent representing business/ landowner | St. Modwen c/o NLP | The sites- Woolwich | W7       | St Modwen has a development interest in the Spray Street area. We support the identification of the site for retail, commercial and residential development and recognise and endorse the Masterplan- led approach to support these town centre uses. The precise balance and mix of uses should be tested and determined at application stage, informed by, and assessed against the Spray Street Masterplan SPD, but identifying the broad range of uses here provides both a framework and flexibility, and is therefore supported. | Support noted.   |
| 39 | Specific                               | TFL                | The sites-          | W6,      | TfL supports site references W6 and W9 allocated as Crossrail  | Core Strategy Policy IM3 Critical Physical   |

| ID | Type of organisation       | Name | Section                         | Site Ref | Summary of comments  | RBG response  |
|----|----------------------------|------|---------------------------------|----------|--|---|
|    | Consultation Body          |      | Woolwich                        | W9       | and DLR sites respectively. However, a general point in Woolwich worth mentioning is that TfL retains a firm aspiration to design and implement Cycle Superhighway 4 (CS4), a new cycle route from London Bridge to Woolwich via Bermondsey, Rotherhithe, Deptford, Greenwich and Charlton. Design of this new route has commenced and implementation is currently programmed for November 2017. This will go through various sites in Woolwich.   | Infrastructure safeguards transport schemes and these are shown on the Policies Map. The next version of the Site Allocations will therefore not repeat the existing safeguarding. Where appropriate, the next version of the allocations will include reference to Cycle Superhighway 4. |
| 39 | Specific Consultation Body | TFL  | The Sites - Greenwich Peninsula | GP5, GP6 | Transport infrastructure – Greenwich Peninsula: TfL supports the reference in paragraphs 4.33 and 5.19 to transport infrastructure and specifically the Silvertown Link tunnel and to its safeguarding. This should be maintained going forward until such time as the tunnel has been constructed. The most recent Safeguarding Direction was issued by the Government Office for London in May 2001 and has been subsequently transferred to the Mayor of London. The direction refers to the Third Blackwall Crossing (now known as the Silvertown Tunnel) and requires all planning applications within the safeguarded area to be referred to the Mayor. Whilst the Silvertown Tunnel is referenced in Table 5.3 it is recommended that it is also referred to in site references GP5 and GP6 as these sites also fall partially into the Silvertown Tunnel Safeguarding area. Table 5.3 GP6 correctly refers to a new interchange within the site allocation listing however, there is no mention in the preliminary text of the interchange. I may be helpful to include a reference to the interchange as it would reflect the recent grant of planning permission for the revised Peninsula Masterplan. | Core Strategy Policy IM3 Critical Physical Infrastructure safeguards transport schemes and these are shown on the Policies Map. The next version of the allocation will include reference to the interchange secured by the Knight Dragon Peninsula Masterplan permission.                |
| 39 | Specific Consultation Body | TFL  | The sites- Charlton             | C5       | TfL supports site reference C5 includes land for transport route, bus and cycle east-west route. TfL reiterates the aspiration of the Charlton Riverside Masterplan that a new highway extending Bugsby's Way eastwards should provide bus accessibility into the regeneration area. For the wider regeneration area, improving bus capacity and accessibility is essential in TfL's view. It is also proposed to help reduce severance caused by the A206 Woolwich Road by taking access traffic, which might be worth mentioning in the 'reasons for identification'.  | Support for east west route noted.  |

| ID | Type of organisation                   | Name                     | Section                       | Site Ref | Summary of comments  | RBG response  |
|----|--|--------------------------|-------------------------------|----------|--|---|
| 40 | Agent representing business/ landowner | Thames Water c/o Savills | General comments              |          | A large number of sites included within the issues and options consultation document have no details of final use, scale of development or timing of delivery. Therefore a detailed site specific response to the consultation cannot be provided at this stage.   | The Preferred Approach document will provide greater clarity and detail on individual sites.  |
| 40 | Agent representing business/ landowner | Thames Water c/o Savills | The sites- Eltham town centre | E3       | The response initially stated that the reservoir is currently in use, though alternatives are being investigated. Should an alternative be identified, the site could come forward for development within the next 5 years. It is considered that if the site came forward for development then a residentially led scheme would be appropriate. However this was later revised to say that the site "Could" become surplus to requirements within the "Plan Period", the revised response also confirms that the site is currently fully operational.   | The site is currently in use and no alternative has been identified as yet. It is therefore considered inappropriate to allocate the site at this stage. Site E3 will be removed from the next version of the Site Allocations. |
| 40 | Agent representing business/ landowner | Thames Water c/o Savills | General comments              |          | Thames Water is working with GLA, EA & Greenwich and Bexley Councils to produce the Charlton to Bexley Riverside Integrated Water Management Strategy. This involves integrated assessment of water, wastewater, environmental water quality and flood risk issues of the project area and will provide recommendations for their management to inform the regeneration and development plans for the area. Important that recommendations of IWMS are secured and delivered to ensure adequate water and wastewater infrastructure. As such suitable policies will be required within the future Greenwich Development Plan policies.   | The recommendations of the IWMS for Charlton Riverside will be incorporated into the next version of the Site Allocations, to a level of detail appropriate to a Local Plan.  |
| 40 | Agent representing business/ landowner | Thames Water c/o Savills | General comments              |          | Thames Water will seek to work with developers, the Council, the GLA and EA to ensure that SuDS opportunities are maximised, and that they are effectively adopted and maintained over their lifetime. Combined sewerage networks deploying strategic and local SuDS solutions will help reduce surface water runoff, potentially to greenfield run off rates. If such a net reduction of surface water runoff can be achieved this will limit the number of combined sewer network upgrades required to accommodate development. In accordance with Policy IM1 of the adopted Core Strategy and the associated supporting text in paragraph 4.8.6, Thames Water may seek planning conditions to ensure that any | Commitment to continued joint working noted and welcomed. The Site Allocations Local Plan will not repeat policies that are contained within the Core Strategy or London Plan.  |



| ID | Type of organisation                   | Name              | Section                         | Site Ref | Summary of comments  | RBG response  |
|----|--|-------------------|---------------------------------|----------|--|---|
|    |  |                   |                                 |          | necessary wastewater infrastructure upgrades are delivered ahead of occupation of development. Developers are advised to contact Thames Water as early as possible regarding this.   |   |
| 41 | Agent representing business/ landowner | U+I Group c/o NLP | The sites - Greenwich Peninsula | GP2      | Alternatively and with the nearby Lovell's Wharf being proposed for allocation as 'Mixed use development incorporating employment uses plus residential within a wider mix, with active commercial/ community uses at ground level, plus riverside public open space and walk' and with the adjoining Enderby Wharf proposed as 'Residential, cruise liner terminal, tourist, community, commercial and retail', it is appropriate for the currently-suggested simple 'mixed use' allocation for Site GP2 Morden Wharf South to be made more specific by referring to the full London Plan and RBG Core Strategy policy background applicable to this next location along the river frontage, particularly with its additional SDL recognition, in the following terms: Residential, tourist, community, commercial and retail plus riverside public open space and walk | The next version of the Site Allocations will provide further detail on the appropriate mix of uses for the site, having reference to those proposed in the response as well as to the Core Strategy and Greenwich Peninsula West Masterplan SPD, as appropriate.   |
| 41 | Agent representing business/ landowner | U+I Group c/o NLP | The sites- Charlton             | C5       | Further, failure to include it within the proposed allocation would mean that opportunities to consider redevelopment for mixed use whilst retaining a working wharf would be minimised. A recent example of this approach can be seen at Albert Wharf (LB Hammersmith and Fulham), where residential use has been proposed above the working wharf. If opportunities to relocate Riverside Wharf, in line with the Core Strategy, were not realised, this option may be preferred in order to complement the wider regeneration and assist in delivering the housing target.  | Riverside Wharf is an operational safeguarded wharf. National, London and local level policies protect its operation. The Mayor's 2018 Safeguarded Wharves Review proposes no change to the status of Riverside Wharf. It would not be appropriate to include Riverside Wharf in the allocation as there is no scope for change of the wharf.   |
| 41 | Agent representing business/ landowner | U+I Group c/o NLP | The sites - Greenwich Peninsula | GP2      | In preference to a crude zoning between employment and other uses as currently proposed in the I&OD, it is therefore requested that, Site GP2 is extended to include the whole of Morden Wharf South, including both the Tunnel Avenue road frontage land and the Southern Warehouse within SIL (but excluding the proposed Safeguarded Wharf to its north), a wider and more suitable definition of proposed uses would be appropriate, much in the way as described for other nearby sites. Such an approach has already been adopted elsewhere in London and would also allow here for  | The draft London Plan and associated evidence base (London Industrial Land demand Study, 2017) identifies Greenwich as a 'retain capacity' borough for the purposes of industrial land management. While the Issues and Options consultation suggested that the Site Allocations may consider revising SIL boundaries (albeit specific to one site in the Thamesmead area), this is not |

| ID | Type of organisation                   | Name              | Section                         | Site Ref | Summary of comments  | RBG response   |
|----|--|-------------------|---------------------------------|----------|--|--|
|    |  |                   |                                 |          | the 'blending' of a suitable mix of uses in a way which delivers the appropriate built components and uses whilst also maximising housing delivery through a fully 'blended' and integrated approach; this would offer a more efficient and more attractive mixed use community with high quality public realm: Mixed use development incorporating residential and employment uses within a wider mix including with active tourist, commercial and community uses at ground level, plus riverside public open space and walk.  | supported by the most up-to-date evidence. The 2012 Employment Land Review that informed the SIL release taken forward through the Core Strategy with Detailed Policies revised SIL boundaries in the Greenwich Peninsula West area, and the Inspector's report on the Core Strategy with Detailed Policies did not recommend that SIL boundaries be reviewed further during the preparation of the Site Allocations Local Plan. Therefore the Site Allocations Local Plan will not seek to revise SIL boundaries as there is no justification for doing so. Existing London Plan and Core Strategy policies provide sufficient guidance regarding development within SILs.  |
| 41 | Agent representing business/ landowner | U+I Group c/o NLP | The sites - Greenwich Peninsula | GP2      | In respect of mixed use development, London Plan Policy 2.7 OUTER LONDON ECONOMY recognises the opportunity for 'consolidating and developing the strengths of outer London's office market through mixed use redevelopment and encouraging new provision in competitive locations...' London Plan Policy 3.3 INCREASING HOUSING SUPPLY recognises that the targets adopted as arising from a SHLAA-driven assessment are constrained to below objectively-assessed need. The Policy clearly indicates therefore that opportunities should be taken to achieve further housing supply above those target levels where appropriate, particularly on brownfield land within Opportunity Areas (such as Greenwich West) and through mixed use development. This creates an ongoing policy obligation generally to seek to maximise housing delivery and in particular in Opportunity Areas and through mixed use development – and thus one which must be adopted alongside the flexibility built into the SIL approach as noted above. This approach is well suited to Morden Wharf, backed up by the recognition of the potential suitability for taller buildings as envisaged through London Plan Policy 7.7 and as | The draft London Plan and associated evidence base (London Industrial Land demand Study, 2017) identifies Greenwich as a 'retain capacity' borough for the purposes of industrial land management. While the Issues and Options consultation suggested that the Site Allocations may consider revising SIL boundaries (albeit specific to one site in the Thamesmead area), this is not supported by the most up-to-date evidence. The 2012 Employment Land Review that informed the SIL release taken forward through the Core Strategy with Detailed Policies revised SIL boundaries in the Greenwich Peninsula West area, and the Inspector's report on the Core Strategy with Detailed Policies did not recommend that SIL boundaries be reviewed further during the preparation of the Site |

| ID | Type of organisation                   | Name              | Section                         | Site Ref | Summary of comments  | RBG response   |
|----|--|-------------------|---------------------------------|----------|--|--|
|    |  |                   |                                 |          | recognised for this location through RBG Core Strategy Policy DH2.   | Allocations Local Plan. Therefore the Site Allocations Local Plan will not seek to revise SIL boundaries as there is no justification for doing so.  |
| 41 | Agent representing business/ landowner | U+I Group c/o NLP | The sites- Charlton             | C5       | In the context of the above and particularly the RB Greenwich preference to consider relocating the Wharf in the future, the failure to include Riverside Wharf in the proposed allocation means that, should the site become vacant and available for redevelopment, it would be without a supportive planning framework despite being included within the wider SDL allocation. This would no doubt result in complications and delays for alternative redevelopment options in the future. It could also result in the failure of the site to maximise its necessary long term potential.   | Riverside Wharf is an operational safeguarded wharf. National, London and local level policies protect its operation. The Mayor's 2018 Safeguarded Wharves Review proposes no change to the status of Riverside Wharf. It would not be appropriate to include Riverside Wharf in the allocation as there is no scope for change of the wharf.  |
| 41 | Agent representing business/ landowner | U+I Group c/o NLP | The sites - Greenwich Peninsula | GP2      | Indeed, the Core Strategy includes the entirety of the U+I holding at Morden Wharf as being within an SDL and within a London Plan Opportunity Area, with paragraph 3.4 of the I&OD noting that the SDLs 'will be the main focus of development in Royal Greenwich over the plan period, along with London Plan Opportunity Areas ...' and that 'It is these sustainable locations where most of the sites within this document will be located.' This emphasises the crucial role of this site in delivering 'strategic development' to meet part of London's and RBG's substantial needs for employment, residential, cultural and other uses. With a Borough-wide requirement for 26,850 new homes over 10 years, the I&OD notes in paragraph 4.4 that 'The majority of this new housing is expected to be delivered in the identified strategic development locations, in and around town centres with good services and accessibility, and in London Plan opportunity areas. The SDLs are thus essential components of land supply for housing delivery. The need for parallel employment land releases to achieve these requirements is also recognised in the Core Strategy and in I&OD paragraph 4.6, as 'The opportunity for the consolidation of existing industrial land within Royal Greenwich to provide additional land for housing has already been identified within the Core Strategy | The draft London Plan and associated evidence base (London Industrial Land demand Study, 2017) identifies Greenwich as a 'retain capacity' borough for the purposes of industrial land management. While the Issues and Options consultation suggested that the Site Allocations may consider revising SIL boundaries (albeit specific to one site in the Thamesmead area), this is not supported by the most up-to-date evidence. The 2012 Employment Land Review that informed the SIL release taken forward through the Core Strategy with Detailed Policies revised SIL boundaries in the Greenwich Peninsula West area, and the Inspector's report on the Core Strategy with Detailed Policies did not recommend that SIL boundaries be reviewed further during the preparation of the Site Allocations Local Plan. Therefore the Site Allocations Local Plan will not seek to revise |

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|----|--|-------------------|---------------------------------|----------|---|---|
|    |  |                   |                                 |          | and this release of employment land, in certain areas, has been agreed in principle.' Policy EA3 of the Core Strategy in respect of Greenwich Peninsula West records that the objective is to include residential uses within mixed use development within the SDL: A new urban quarter will be created at Greenwich Peninsula West as shown on the Proposals Map as a Strategic Development Location SDL). The SDL will include a range of uses including residential and commercial. It is noted that Morden Wharf South is the only riverside part of the SDL which is not within an SIL and would thus have a strong presumption in favour of residential-led mixed use development.  | SIL boundaries as there is no justification for doing so.   |
| 41 | Agent representing business/ landowner | U+I Group c/o NLP | The sites- Charlton             | C5       | It is accepted that the current status of Riverside Wharf means that it is a protected Wharf. However, the supporting text to Policy EA2, the Core Strategy states that: "Royal Greenwich intend to keep the status of Riverside Wharf under review and believe that there may be justification for the relocation of this wharf or for its release from safeguarding in the future". We believe it is recognised by the Council that both the adopted and the emerging masterplan for Charlton Riverside are conscious of the impact a working wharf can have on the wider area's ability to deliver the wholesale regeneration, supporting up to 5000 new dwellings. In this respect, finding a long term solution to the Wharf, which may or may not include its relocation, will be to the significant benefit of the entire Charlton Riverside area. | Riverside Wharf is an operational safeguarded wharf. National, London and local level policies protect its operation. The Mayor's 2018 Safeguarded Wharves Review proposes no change to the status of Riverside Wharf. It would not be appropriate to include Riverside Wharf in the allocation as there is no scope for change of the wharf.   |
| 41 | Agent representing business/ landowner | U+I Group c/o NLP | The sites - Greenwich Peninsula | GP2      | It is accepted that the recognition of land as being within Strategic Industrial Location (SIL) is entirely relevant for decisions on any appropriate allocation(s) of individual sites to be made within the proposed Allocations Plan and needs to be taken into account. However, there are examples in the Issues and Options document which suggest that such boundaries, whilst finite, are not binding. By way of example, the proposed allocation GP13 Enderby Wharf includes both residential and related commercial development and lies with its river frontage area being outside any SDL but with its amenity and road access areas within both an SDL and SIL. This is a correct and comprehensive approach as allocations from the   | The draft London Plan and associated evidence base (London Industrial Land demand Study, 2017) identifies Greenwich as a 'retain capacity' borough for the purposes of industrial land management. While the Issues and Options consultation suggested that the Site Allocations may consider revising SIL boundaries (albeit specific to one site in the Thamesmead area), this is not supported by the most up-to-date evidence. The 2012 Employment Land Review that |

| ID | Type of organisation                   | Name              | Section                         | Site Ref | Summary of comments   | RBG response   |
|----|--|-------------------|---------------------------------|----------|---|--|
|    |  |                   |                                 |          | Core Strategy are required for all main land use purposes, such as for employment as well as for residential or other mixed use developments. Indeed, it is also noted that in the Issues and Options document (I&OD) that there are various allocations including either residential or residential led mixed use development.   | informed the SIL release taken forward through the Core Strategy with Detailed Policies revised SIL boundaries in the Greenwich Peninsula West area, and the Inspector's report on the Core Strategy with Detailed Policies did not recommend that SIL boundaries be reviewed further during the preparation of the Site Allocations Local Plan. Therefore the Site Allocations Local Plan will not seek to revise SIL boundaries as there is no justification for doing so.   |
| 41 | Agent representing business/ landowner | U+I Group c/o NLP | The sites - Greenwich Peninsula | GP2      | London Plan Policy 2.17 STRATEGIC INDUSTRIAL LOCATIONS indicates that boroughs should 'promote, manage and, where appropriate, protect the strategic industrial locations ... as London's main reservoirs of industrial and related capacity...' and in planning decisions that development proposals in SILs should be refused unless certain circumstances apply, including where 'they are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework or borough development plan document' – meaning that it is the role of the Allocations Plan (after Core Strategy adoption) to determine whether the full extent of SIL is still required in the long term (or not, as has happened previously for Enderby Wharf). In so doing, Policy 2.17 requires boroughs to identify SILs on proposals maps but also to develop local policies based on clear and robust assessments of need to protect their function, to enhance their attractiveness and competitiveness for industrial type activities including access improvements.' | The draft London Plan and associated evidence base (London Industrial Land demand Study, 2017) identifies Greenwich as a 'retain capacity' borough for the purposes of industrial land management. While the Issues and Options consultation suggested that the Site Allocations may consider revising SIL boundaries (albeit specific to one site in the Thamesmead area), this is not supported by the most up-to-date evidence. The 2012 Employment Land Review that informed the SIL release taken forward through the Core Strategy with Detailed Policies revised SIL boundaries in the Greenwich Peninsula West area, and the Inspector's report on the Core Strategy with Detailed Policies did not recommend that SIL boundaries be reviewed further during the preparation of the Site Allocations Local Plan. Therefore the Site Allocations Local Plan will not seek to revise SIL boundaries as there is no justification for doing so. |

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|----|--|-------------------|---------------------------------|----------|--|--|
| 4I | Agent representing business/ landowner | U+I Group c/o NLP | The sites - Greenwich Peninsula | GP2      | London Plan Policy 4.4 MANAGING INDUSTRIAL LAND AND PREMISES includes the requirement for boroughs to use the plan-making process to assess 'the potential for surplus industrial land to help meet strategic and local requirements for a mix of other uses such as housing'. The UK does not have a simple zoning system. There is accordingly now an opportunity for the Allocations document process not to reverse strategic allocations made through the recently-adopted Core Strategy but, rather, to refine the interpretation of the policies behind those allocations in order that the objectives behind them are best achieved. With the strategic requirement for 'clear and robust assessments of need to protect' the function of SIL areas and the opportunity for 'access improvements', there can be the required local interpretation of the strategic policies through this I&OD process, including through mixed use developments. | The draft London Plan and associated evidence base (London Industrial Land demand Study, 2017) identifies Greenwich as a 'retain capacity' borough for the purposes of industrial land management. While the Issues and Options consultation suggested that the Site Allocations may consider revising SIL boundaries (albeit specific to one site in the Thamesmead area), this is not supported by the most up-to-date evidence. The 2012 Employment Land Review that informed the SIL release taken forward through the Core Strategy with Detailed Policies revised SIL boundaries in the Greenwich Peninsula West area, and the Inspector's report on the Core Strategy with Detailed Policies did not recommend that SIL boundaries be reviewed further during the preparation of the Site Allocations Local Plan. Therefore the Site Allocations Local Plan will not seek to revise SIL boundaries as there is no justification for doing so. |
| 4I | Agent representing business/ landowner | U+I Group c/o NLP | The sites- Charlton             | C5       | Our client has various land ownership and interests within the Charlton Riverside Central area and therefore will be a key stakeholder in the regeneration of Charlton Riverside. One of the land parcels within its ownership is Riverside Wharf. We note that the suggested allocation C5 has been drawn to specifically exclude Riverside Wharf, whilst the 2012 Charlton Riverside Masterplan includes the Wharf within its boundary and the 2014 Core Strategy Policies Map including the Wharf within the Charlton Riverside Strategic Development Location.   | Riverside Wharf is an operational safeguarded wharf. National, London and local level policies protect its operation. The Mayor's 2018 Safeguarded Wharves Review proposes no change to the status of Riverside Wharf. It would not be appropriate to include Riverside Wharf in the allocation as there is no scope for change of the wharf.  |
| 4I | Agent representing business/           | U+I Group c/o NLP | The sites- Charlton             | C5       | Our client would not expect RB Greenwich to allocate the site without reference both to the Working Wharf and its current safeguarding. However, given the clarification in the supporting   | Riverside Wharf is an operational safeguarded wharf. National, London and local level policies protect its operation. The  |

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|----|--|-------------------|---------------------------------|----------|--|---|
|    | landowner                              |                   |                                 |          | text (as above) for the options available at Riverside Wharf, it should be included in the current allocation for C5 with a view to its redevelopment in the future either following the relocation of the working Wharf or in tandem with it (as per Albert Wharf). The normal safeguarding requirements will be required in any event for nearby new housing in the event that the safeguarding has remained, as for the recently-approved close relationship between Enderby Wharf Phase 2 and the safeguarded Tunnel Glucose Wharf (Morden Wharf south).   | Mayor's 2018 Safeguarded Wharves Review proposes no change to the status of Riverside Wharf. It would not be appropriate to include Riverside Wharf in the allocation as there is no scope for change of the wharf.   |
| 41 | Agent representing business/ landowner | U+I Group c/o NLP | The sites- Charlton             | C5       | The Charlton Riverside Central site is allocated for comprehensive mixed use redevelopment and is clearly the principle site within the wider Charlton Riverside London Plan Opportunity Area. In this respect, it would be expected to deliver the majority of the Core Strategy housing target for the area (i.e., up to 5,000 dwellings). These principles are supported by our client.   | Support noted.  |
| 41 | Agent representing business/ landowner | U+I Group c/o NLP | The sites - Greenwich Peninsula | GP2      | The Core Strategy had released a smaller amount of protected employment land than had been envisaged in the London Plan, as advised to RBG at the examination into the Core Strategy. Accordingly, the potential for mixed use development to act as a driver for delivery of employment floorspace can therefore still be accommodated in appropriate locations. Paragraph 3.3 of the I&OD notes that 'The spatial strategy assumes a high level of continuous growth over the plan period. It also provides for substantial release of under-used industrial land and ... release of industrial land at Greenwich Peninsula West for new homes and employment uses.' | The draft London Plan and associated evidence base (London Industrial Land demand Study, 2017) identifies Greenwich as a 'retain capacity' borough for the purposes of industrial land management. While the Issues and Options consultation suggested that the Site Allocations may consider revising SIL boundaries (albeit specific to one site in the Thamesmead area), this is not supported by the most up-to-date evidence. The 2012 Employment Land Review that informed the SIL release taken forward through the Core Strategy with Detailed Policies revised SIL boundaries in the Greenwich Peninsula West area, and the Inspector's report on the Core Strategy with Detailed Policies did not recommend that SIL boundaries be reviewed further during the preparation of the Site Allocations Local Plan. Therefore the Site |

| ID | Type of organisation                   | Name              | Section             | Site Ref | Summary of comments   | RBG response  |
|----|--|-------------------|---------------------|----------|---|---|
|    |  |                   |                     |          |   | Allocations Local Plan will not seek to revise SIL boundaries as there is no justification for doing so.  |
| 41 | Agent representing business/ landowner | U+I Group c/o NLP | The sites- Charlton | C5       | Whilst the options for future uses are broadly acceptable, the extent of the allocation is not. Riverside Wharf should be included within the allocation.   | Riverside Wharf is an operational safeguarded wharf. National, London and local level policies protect its operation. The Mayor's 2018 Safeguarded Wharves Review proposes no change to the status of Riverside Wharf. It would not be appropriate to include Riverside Wharf in the allocation as there is no scope for change of the wharf. |
| 41 | Agent representing business/ landowner | U+I Group c/o NLP | The sites- Charlton | C5       | With respect to the housing target, it is worth noting that there are locations within the Charlton Riverside Central allocation where business uses are trading well and there is no guarantee that owner occupiers would seek to develop or sell for redevelopment. This in turn puts pressure on the remaining allocation to deliver the planned growth. It would therefore be prudent for RB Greenwich to maximise all opportunities, such as Riverside Wharf, within the allocation, allowing it to assist the wider allocation in delivering the housing targets. | Riverside Wharf is an operational safeguarded wharf. National, London and local level policies protect its operation. The Mayor's 2018 Safeguarded Wharves Review proposes no change to the status of Riverside Wharf. It would not be appropriate to include Riverside Wharf in the allocation as there is no scope for change of the wharf. |
| 42 | Individual                             |                   | General comments    |          | The ridge and furrow field systems in Eltham clustered around King John's Walk (footpath heading south from Eltham Palace) is very rare surface archaeology and should be protected. Pippenall Farm SINC also has ridge and furrow. The Eltham examples are all either grazing land, golf courses or public parks. The Ridge and Furrow plough marks are fragile remains of our medieval agricultural past; liable to be lost forever if the land is ploughed or re-seeded to improve grazing.  | The protection of ridge and furrow field systems is outside the scope of the Site Allocations Local Plan. The Core Strategy contains policies relating to archaeology and open space.   |
| 43 | Individual                             |                   | General comments    |          | A new exit to the rear, North West side of Charlton Station is needed, to allow easier pedestrian access to the Sainsbury's/M and S sites. This should be included as part of the new transport interchange plans for Charlton.   | Further detail on the transport infrastructure necessary to support the development of the Charlton Riverside area will be included in the next version of the Site Allocations, and also in the updated Infrastructure Delivery Plan (IDP). The land   |



| ID | Type of organisation | Name | Section            | Site Ref | Summary of comments   | RBG response   |
|----|----------------------|------|--------------------|----------|---|--|
|    |                      |      |                    |          |   | around Charlton Station is outside the scope of this Site Allocations as there are no current proposals for upgrades to the station.   |
| 43 | Individual           |      | General comments   |          | A vision is needed for a smaller level retail and mixed usage, low to medium rise, that links Charlton church lane across the Woolwich road north and south, removing the large Macro retail shed and SELCO the other side. The existing masterplan vision of a 'downgraded' Woolwich road is part of this vision. The big road junction at this site needs reducing in size, encouraging all heavy traffic to go down Bugsby's Way and greening up and 'localising' Woolwich road from this point. In line with this, there should be more smaller retail sites directly facing onto the Woolwich road to create more of a community feel. | Further detail will be provided regarding the potential for additional retail as part of the mixed use redevelopment of Charlton Riverside Central in the next version of the Site Allocations.  |
| 43 | Individual           |      | The sites-Charlton | C2       | The change in use at C2 away from large retail is phrased negatively. ('threatens retail growth in Woolwich') I would like this to be expressed positively, and also to allow some smaller retail, eg to encouraging smaller, local level retail. Woolwich priority for retail should not preclude some retail in Charlton.   | The retail development within the C2 site is relatively recent and the 2017 Charlton Riverside SPD indicative phasing for this area beyond 2031. Because the phasing in the SPD is outside the plan period, site C2 will not be included in the next version of the Site Allocations. This area of Charlton Riverside is more appropriately considered as part of Local Plan review.       |
| 43 | Individual           |      | The sites-Charlton | C5       | The usage plan for a transport hub at the SW corner of C5 opposite Charlton Church lane also needs to be clarified with respect to the land around Charlton Station. The transport hub needs to be close to Charlton Station, using the land nearby. Currently this land is not part of C5, and needs to be. An interchange opposite Charlton church lane is too far from the station. But an interchange at Charlton is sorely needed.   | Further detail on the transport infrastructure necessary to support the development of the Charlton Riverside area will be included in the next version of the Site Allocations, and also in the updated Infrastructure Delivery Plan (IDP). The land around Charlton Station is outside the scope of this Site Allocations as there are no current proposals for upgrades to the station. |
| 43 | Individual           |      | General comments   |          | There needs to be some commitment to height limits noting the need for a mixed usage site – it should differ in appearance from   | Further detail on the appropriate scale of development will be provided in the next  |

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|----|----------------------|------|---------------------|----------|---|---|
|    |                      |      |                     |          | the peninsula where heights over 20 floors are now happening. The re-submitted Valley House development of 73 flats (to go to committee on 6 April) sets a maximum at around 7 floors – I would like to see an expectation that anything over 4/5 floors is 'by exception'. So some further thought could be given to the visual appearance of the sites in Charlton and planning directions re height and bulk etc.  | version of the Site Allocations. No justification has been provided for the suggestion that heights be limited to five storeys across the entirety of the area, and such an approach would be overly prescriptive for a Local Plan document.  |
| 43 | Individual           |      | General comments    |          | Thinking of the river frontage, there needs to be more public, green space identified clearly, adjacent to the river.   | Core Strategy Policy EA2 sets the vision for the Charlton Riverside SDL, which includes an increase in both the quantity and quality of open space in the area. Further detail on the appropriate form and location of new open space required to achieve this objective will be included in the next version of the Site Allocations.  |
| 43 | Individual           |      | The sites- Charlton | C2/C 5   | Both C2 and C5 express the current retail offer negatively, and pejoratively – as 'retail sheds'. This contradicts current Council strategy, as expressed on the website in much more positive terms: "Royal Greenwich boasts some lively traditional town centres at Greenwich, Woolwich and Eltham. It also prides itself on impressive retail parks at Charlton and Thamesmead." With the above quote in mind, the new large Sainsburys and Marks and Spencer sites at C5 should form the basis for a re-designed retail heart for new Charlton, taking up the slack from C2. The future of this new site, only opened in summer 2015, is implicitly threatened by the site usage statements (I was a member of the Gallions Stakeholder Group of local amenity groups, which worked with the developer closely, and positively over 2 year period to get this development right. I don't think these developers would like to see their new stores described as 'retail sheds'. – so I would ask that C5 be revised to articulate a clearer vision for some retail, as part of the wider mixed usage planned for this area. Also note that the new Sainsbury's replaces the landmark eco building at the peninsula – and this new store is supposed to be even greener. And to act as a new landmark. | Core Strategy Policy EA2 sets the vision for the Charlton Riverside SDL, which includes a reduction in the amount of out of centre retail. The retail development within the C2 site is relatively recent and the 2017 Charlton Riverside SPD indicative phasing for this area beyond 2031. Because the phasing in the SPD is outside the plan period, site C2 will not be included in the next version of the Site Allocations. This area of Charlton Riverside is more appropriately considered as part of Local Plan review. Further detail will be provided regarding the potential for additional retail as part of the mixed use redevelopment of Charlton Riverside Central in the next version of the Site Allocations. |

| ID | Type of organisation | Name | Section                          | Site Ref | Summary of comments   | RBG response   |
|----|----------------------|------|----------------------------------|----------|---|--|
| 44 | Individual           |      | The sites- Plumstead town centre | P3       | Refurbish the existing building or rebuild on the existing site or half of the site for (Leisure)activities that require larger spaces. Rent the Ex-Kinara Children's Centre to a community group to provide a healthy café and spaces to compliment, enhance and extend existing services to provide work spaces for emerging small businesses.  | The leisure uses on this site are now to be reprovided in the ongoing redevelopment of the adjacent Library Site. The use for the Kinara centre proposed would fall in the same use class as its current designation. In addition to this the site itself is too small to be considered strategically important. It is therefore inappropriate to include this site in the Site Allocations Plan                             |
| 44 | Individual           |      | The sites- Plumstead town centre | P2       | All of the library should be retained, with remedial work to safely retain Grade II listed features and to install modern technology. Rather than pursuing current plans to replace and extend most of the current building with a modern structure, the 1936 section should be extended to the side and above to a total of 3 storeys. The roof area and upper storey of the 1903 building may need to be modified due to some inefficient usage of space. This, together with existing rooms and basement can then be used for leisure activities which do not require large spaces. The library does not require a rebuild to allow WiFi, email access, etc. | The site is to be excluded from the Site Allocations document as planning permission has now been granted to refurbish and extend the building to provide Library, Leisure and Cultural facilities. The Grade II listed Building is retained.  |
| 44 | Individual           |      | The sites- Plumstead town centre | P6       | Convert P6 into a leisure, arts and cultural centre. This would link isolated Thamesmead and Plumstead with the added benefit of proximity to the railway station and new bus garage.   | Whilst Leisure uses are not to be retained on Site P3 they are to be reprovided within the redevelopment of an adjacent site. Therefore Leisure centre uses are not required in this location. The position of this site within SIL would limit its purpose for industrial uses. Though some cultural and leisure uses which are ancillary to the main purpose of the site for various, small industrial uses, are proposed. |
| 44 | Individual           |      | The sites- Plumstead town centre | P1       | Surveys of the Aberly Street Car Park indicate that the typical usage is short term to enable people to visit shops or pick up a take-away etc. Use is calculated at a rate of around 60 cars per hour throughout the day and eve Mon-Fri. It is estimated that 2/3rds of users fail to pay so information from ticket machines is likely to be incorrect.  | Replacement car parking can be incorporated into redevelopment of the site. Proposed retail frontage will address the gap in the retail frontage and the unattractive character of an area of unrelieved tarmac, and so should improve retail viability in the   |

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|    |                      |      |                                  |          | <p>Whilst building on this site would go some way to dealing with “Severance in active frontage” the resulting financial blow to local businesses would be severe.</p> <p>The loss of disabled parking would also be unsatisfactory due to the length of the High Street.</p> <p>The loss of parking would exacerbate existing parking problems in local side streets that could not be overcome by extending the CPZ as this would also cause further problems for the local businesses.</p>   | high street. However at 0.09ha The site is too small to be considered strategically important.  |
| 45 | Individual           |      | The sites- Plumstead town centre | P2       | Does the leisure centre proposed on site P2 make provision for the inclusion of the bowling rinks that will be lost with Site P3 becoming a residential development? If not why not? If new indoor bowls are not to be included has any consideration been given to including this facility in the sports development at Suttcliffe Park, Kidbrooke?  | The site is to be excluded from the Site Allocations document as Planning permission has now been granted to refurbish and extend the building to provide Library, Leisure and Cultural facilities. The Grade II listed Building is retained. The Library development provides multifunctional sports provision that is supported by Sport England. The development is in line with the Sports Facility Strategy published in 2015. |
| 46 | Individual           |      | The sites- Greenwich town centre | G3       | Royal Hill Court contains 12 two bedroom flats. I understand the building was originally put up by the Royal Arsenal Co-operative Society in the early mid-1970s as affordable rented accommodation for local people. Later the residents were offered the opportunity to buy the flats at a discount. Some are currently owner-occupied, largely by first time buyers. Others are rented out, in many cases to people working or studying in the neighbourhood. A new development might not provide similar opportunities. Also the existing occupants would presumably be displaced - either permanently or for a considerable time - while building was in hand. I suggest the architectural aspect of the existing flats also makes them well worth preserving. Built under the budgetary constraints applicable to an affordable housing development, the flats are an attractive example of modernist 1970s design. The glass lobby running the full height of the front of the building, with its naturally lit stairwell, is particularly striking. | Comments on site ownership, characteristics and constraints noted. This site will not be taken forward in the next version of the Site Allocations.   |

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|----|----------------------|------|---------------------------------|----------|--|--|
|    |                      |      |                                 |          | All of the building – in its modest way – looks stylish as well as being comfortable and homely to live in. In summary, I suggest the best way forward for the Royal Hill Court precinct would be to work with our Residential Head lease Company and our leaseholders to enable continued refurbishment. The same should apply, if they wish it, to the existing businesses and the car park owner. That way they could and we could continue to provide accommodation, shop and parking facilities, and pay business and community charges while improvements are made. Finally, I suggest that - as regards looking for new opportunities to develop - it would be beneficial to look at community-based refurbishment approaches, such as the work done by Abolish Empty Buildings in Bristol and Architects for Social Housing. |  |
| 47 | Individual           |      | The Sites - Greenwich Peninsula | GP9      | As a trustee of the Ecology park this development around needs to be as sensitive as possible to help protect the park. One main issue is the 20+ storey block flats which is planned to be built next to the Eco Park. This will have detrimental effect on the park. This building needs to drop a few floors. GMV are working with the Land Trust & the TCV to help with all the planting- native hedgerows and wild flower meadows around the Southern Park and the Ecology park. This should be the Blueprint for the rest of the Peninsula using knowledge from the Land Trust and the TCV to help link all the green sites' ecology. More affordable housing?   | The 20 storey tower on the north eastern boundary of the Ecology Park was given permission as part of the GMV Phases 3,4 and 5 outline permission (12/0022/O). This also secured the proportion of affordable housing. |
| 47 | Individual           |      | The Sites - Greenwich Peninsula | GP2      | As the river is now more accessible some parts will need protecting from public access the developers should be working with local groups, the PLA and the Environment agency to make sure this happens. The wharves also need to be protected if possible the one nearest to the old Tunnel refinery site to be planted with green roof plants and left undisturbed. More affordable housing?   | Further detail on ensuring accessibility of the Thames Path and the riverside as part of any redevelopment proposals will be included in the next version of the sit allocation.                                       |
| 47 | Individual           |      | The Sites - Greenwich Peninsula | GP10     | As the school site will take out some good quality trees still left on the peninsula the planting around the school must be of a high quality. having spoken to them at their consultation they want to work with the Folks at the Ecology park and the Land Trust with the planting and their own small ecology park in the school  | The detailed planting plans for a specific part of the site is outside the scope of the Site Allocations Local Plan.   |

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|    |                      |      |                                 |          | grounds.  |  |
| 47 | Individual           |      | The Sites - Greenwich Peninsula | GPI I    | Concerned at failure to maintain landscaping in development already on site. The Planting on this site now is very poor and already started to die and go brown this needs looking at soon. The green roof also needs a bit of work. Local residents in the flats have a habit of dropping the cigarettes end onto it, not a good idea if we have a hot summer.               | Site has been redeveloped and will not be included in the next version of the Site Allocations. The maintenance of landscaping is outside the scope of the Site Allocations Local Plan.  |
| 47 | Individual           |      | The Sites - Greenwich Peninsula | GP7      | More community based projects in the O2 itself and to be honest it's far to expensive and full rubbish corporate type bar and restaurants to interest me.   | Site has been redeveloped and will not be included in the next version of the Site Allocations.  |
| 47 | Individual           |      | The Sites - Greenwich Peninsula | GPI      | No comments on use but wishes to see affordable housing; concerned with ecological aspect of landscaping choice.  | Site has been redeveloped and will not be included in the next version of the Site Allocations.  |
| 47 | Individual           |      | The Sites - Greenwich Peninsula | GP5      | Not sure if the riverside vegetation is part of this phase but it must be consistent with hopefully any new native planting with help from the Land Trust and TCV. More affordable housing?   | Detailed planting plans are outside the scope of the Site Allocations. The proportion of affordable housing was secured as part of the outline planning permission for the site.   |
| 47 | Individual           |      | The Sites - Greenwich Peninsula | GP3      | The gasometer needs to be protected and could be turned in to an outside cinema or theatre. There are also some old trees still left on this site. Protection orders need to be put into place asap on these before someone chops them down. As this site is very close to Blackwall Tunnel a huge amount of good native planting could be used to suck up all the pollution. | Further detail on how redevelopment proposals should respond to the industrial heritage of the site and introduce new landscaping will be provided in the next version of the site allocation, having regard to the planning brief for the site that was adopted in November 2017. |
| 47 | Individual           |      | The Sites - Kidbrooke           | K7       | The New Ecology part of Sutcliffe Park has been a great success with attracting several new bird species to the area. Extending this park will improve it even more. Environment Agency should be used for design and build. A good management plan from an ecologist is needed. Dog owners should be encouraged to act responsibly.  | Noted.   |
| 47 | Individual           |      | The Sites - Greenwich Peninsula | GP4      | The protection of the riverside and the use of Native planting to connect every other piece green space on this peninsula is vital. Please make sure the parks are as native as possible using what the land trust and the TCV are doing on Southern Park. More affordable housing?   | Detailed planting plans are outside the scope of the Site Allocations. The proportion of affordable housing was secured as part of the outline planning permission for the site.   |

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|----|----------------------|------|---------------------------------|----------|--|---|
| 47 | Individual           |      | The Sites - Greenwich Peninsula | GPI3     | There should be more affordable housing on this site. The riverside landscaping has to be of a higher quality, native when possible. There needs to be a land based power station for liners when in dock.   | This site has planning permission and the majority of the site has been completed. The next version of the Site Allocations will include the part of the site relating to the proposed cruise liner terminal, and will identify alternative options for redevelopment should the terminal not be pursued. |
| 47 | Individual           |      | The Sites - Greenwich Peninsula | GP8      | This has some interesting green spaces already there, but the old ecology park site which was connected to old water recycling system in O2 when it was first opened and then pulled out by AEG, what's left has potential. Land Trust could help with its reconstruction. The trees and bushes by Blackwall point have not been managed very well there has been a lot trees and bushes cut down which need replacing. I have also seen some of the vegetation being planted by the hotel. It does not look good. The old wharf by Blackwall Point also needs some work done on it. | The maintenance of landscaping is outside the scope of the Site Allocations.  |
| 47 | Individual           |      | The Sites - Greenwich Peninsula | GP6      | Wishes to see more affordable housing and more native vegetation.  | Detailed planting plans are outside the scope of the Site Allocations. The proportion of affordable housing was secured as part of the outline planning permission for the site.  |
| 48 | Individual           |      | General comments                |          | Would like to see less betting shops in Woolwich, particularly on Powis Street and to prioritise a good balance of businesses of what residents would like. They are the contributors to council tax. Hare Street is also in need of a new venture and new environment. We need more eating places in Woolwich, it is completely dead after 6 o'clock apart from bus stop occupants.   | The need to ensure a good balance of businesses within the town centre has guided the development of the Site Allocations as far as the scope allows. The balance of businesses will be further addressed in the Woolwich Town Centre SPD.  |
| 48 | Individual           |      | General comments                |          | Would like to see less betting shops in Woolwich, particularly on Powis Street and to prioritise a good balance of businesses of what residents would like. They are the contributors to council tax. Hare Street is also in need of a new venture and new environment. We need more eating places in Woolwich, it is completely dead after 6 o'clock apart from bus stop occupants.   | The need to ensure a good balance of businesses within the town centre has guided the development of the Site Allocations as far as the scope allows. The balance of businesses will be further addressed in the Woolwich Town Centre SPD.  |

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| 49 | Individual           |      | General comments   |          | Site Allocations document is unintelligible.  | The Preferred Approach document will provide greater clarity and detail on individual sites.  |
| 50 | Individual           |      | The sites-Charlton | C6       | Should include access road connecting to site as there may be potential for better and more efficient site configuration.       | Potential for reconfiguration of access to the site will be considered in next version of the allocation.   |
| 50 | Individual           |      | The sites-Charlton | C4       | Should include green area to north and which wraps around Thames Barrier facilities, to connect to Thames waterfront.           | The EA have confirmed that this area is sensitive in terms of security for the operation of the Thames Barrier, and have requested this area be safeguarded for storage of equipment under the TE2100 Plan. The next version of the allocation for Charlton Riverside Central will clarify how the new development should relate to Barrier Park and that the operational requirements of the Thames Barrier. |
| 50 | Individual           |      | The sites-Charlton | C5       | Should include Woolwich Road opportunity through developer contributions to transform public realm and create welcoming avenue. | General improvements to Woolwich Road are outside the scope of the Site Allocations. The 2017 Charlton Riverside SPD provides guidance on how this road corridor can be improved.   |