

Royal Borough of Greenwich

Urban Design Guide SPD
Public Consultation Statement
August 2023



I Consultation

- A five-week formal public consultation was carried out on the Urban Design SPD from 3rd March to 11th April 2023 in accordance with Regulation 12 of the Local Planning (England) Regulations 2012 and the procedures set out in the Council's Statement of Community Involvement (SCI).
- Direct consultees included specific consultation bodies set out in legislation 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.
- The following consultation activities were undertaken for the Urban Design SPD, in accordance with the Regulations and the SCI:
- The document was published on the Royal Borough's website which took people to the Commonplace platform. The Commonplace platform provided an explanation of each chapter within the SPD and a questionnaire form to obtain feedback. Additionally hard copies of the document were placed for reference in the following libraries: Eltham Library, Greenwich Centre Library, Thamesmere Library and Woolwich Centre Library. Posters/panels were provided to each library to advertise the consultation, together with hard copies of the questionnaire.
- Notifications were sent to all those on the Planning Policy Consultation Database and the Commonplace Consultation Database (both included 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 to make representations and advising them of the timeframe within which representations had to be received.
- The consultation was publicized using a wide variety of local and London media press including: Newshopper, South London Press and Greenwich Info (Issue 169 and 170). The consultation was published on the council's website and on Commonplace. A variety of social media platforms were also used to consult on the SPD. This included the use of: Facebook, Next Door, Instagram and Twitter.
- Local groups/networks were also able to request that officers attend one of their meetings to discuss the document.
- Copies of the consultation materials are included in Appendix A.

2 Who responded

- The relative majority of comments were from landowners/businesses, followed by anonymous comments via Commonplace. The breakdown of the comments by type is set out below:
- Landowners/businesses 36%
- Anonymous comments via Commonplace (mostly from individuals) 22%
- General and specific consultation bodies 20%

- Amenity groups/Residents associations 13%
- Individuals 5%
- Political parties 4%
- Of the 256 individual comments received, 46 percent of these resulted, directly or indirectly, in a positive action being taken in the preparation of the Urban Design Guide SPD. These actions are categorised as:
 - Revision of text and design principles;
 - Removal of elements of the SPD that may have been perceived as creating new policy in contradiction with the current RBG local plan;
 - Corrections of maps included in the SPD and associated evidence base documents, based on identified errors;
 - Replacement of some pictures regarding precedent development, with more pertinent examples or precedents.

3 Analysis of feedback and Council's response.

- A summary of the main issues raised and the Council's response on the different themes of the consultation and sections of the document are reported below, including comments made about the supporting evidence base documents which have been made available to the public, despite not being formally subject to public consultation, specifically the Characterisation Study and Tall Buildings.

Making better use of land and buildings (Chapters B and C)

- 83 comments were received regarding the first two chapters of the SPD, which focus on the broader strategic context of the Royal Borough and provide an overview of the principal intensification methods for the identified area types in Royal Greenwich. Some of them referred to creating more sustainable, biodiverse places, a theme transversal to the whole SPD, which is treated in the following chapter.
- Landowners asked for some clarification on the thematic maps included in these chapters and the implications of sites in their ownership being included in some typological areas instead of others. These include figure b.5: Existing dwelling density within the borough; figure b.7: Existing character area's sensitivity to change; and figure c.1: Principal typological areas with potential for intensification.
- Other comments received concerned the outlined general principles for development within industrial areas or their immediate surroundings.
- Comments from Historic England recommended that proposals should be encouraged to use heritage significance to shape the design of new development rather than simply avoid harm.

Council's response

- The thematic maps in the SPD extracted from the accompanying Characterisation Study are based on existing conditions and a high-level assessment of the whole borough. Rather than providing prescriptive recommendations, their role is to facilitate the explanation of the urban design methodology for new development in RBG underpinning the SPD, which starts from a comprehensive analysis of each site's characteristics and their surrounding context. The Characterisation Study and Tall Building Assessment (CSTBA) will be used to formulate new policies in the upcoming review of RBG Local Plan, which will provide further detail on development sites in Royal Greenwich. Therefore, future opportunities will exist to interrogate this evidence further. This said, minor corrections have been made to the maps and their captions where an error was effectively identified.
- Most of the comments received on industrial areas exceed the remit of this high-level SPD, which can't inform new policy in contradiction with the current RBG Core Strategy. However, some of these comments have been useful to refine guidance regarding designated and non-designated industrial areas and the re-provision of spaces for existing local businesses.
- The comments from Historic England on the centrality of heritage assets in the design process have been well received and integrated in the guidance.
- Other minor changes were made as reported in Appendix B in response to pertinent comments received.

Creating well designed, well connected, inclusive places (Chapters D, E, F and G)

- 86 comments have been received regarding the central part of the document incorporating four chapters, which provide useful design principles for forming a robust development strategy and site layout, designing accessible, inclusive and safe streets and public spaces, best practice and contextual building design and residential amenity.
- Comments have been received regarding the importance of creating a clear hierarchy of spaces, functions and users of the public realm, prioritising pedestrians, cyclists, families and children.
- Other comments regard the outlined categories of streets, car-free development, on-street and private car-parking, bike-hire schemes, cycle storage and other related topics.
- Regarding tall buildings, an issue was raised by Historic England and some major landowners/businesses on part of the guidance in the SPD extracted from the Tall Buildings Assessment. This includes the defined categories of large and tall buildings and Figure f.4: Recommendation by the RB Greenwich Tall Building Study (2021) on locations that may be appropriate for tall buildings, at page 178 of the SPD. The raised issue is that this guidance would not be fully in line with the current RBG Local Plan - Core Strategy and consequently inform new policy, in contradiction with the remit of supplementary planning documents, which can provide further guidance on policies contained within local plans but cannot inform new policy.

- Some concern was also raised by landowners/businesses on the defined design principles for contextual development in Royal Greenwich, which are in their opinion too strict regarding height.

Council's response

- Some of the received comments have been useful to refine the guidance, for example regarding the defined categories of streets. Others exceed the scope of the SPD and are already fully addressed by the recently adopted RBG Transport Strategy, for example; the need for more safe cycle routes and improved pedestrian foot paths.
- To avoid any misleading perception that the SPD would create new policy in contradiction to the current RBG Local Plan, the section regarding tall buildings in Chapter F of the SPD has been revised. Figure f.4 at page 178 has been removed and replaced with a set of design principles, more in line with the spirit and intent of the SPD.
- The categories of large and tall buildings have been maintained. However, additional clarification has been provided on the fact that these categories should not be interpreted as rigid thresholds or prescriptive indication on the suitable heights for specific sites, but as useful principles to facilitate the definition of a design methodology for tall buildings in Royal Greenwich.
- Regarding the guidance for contextual development, the SPD is in line with the London Plan, which recommends that tall buildings should be acceptable only on identified areas in local plans. The SPD does not preclude intensification on areas not suitable for tall buildings, however by means of mid-rise typologies. In conclusion, the SPD is guidance only and focuses on establishing a virtuous and comprehensive design process for all developments in Royal Greenwich instead of dictating rigid policies. The Characterisation and Tall Buildings Assessment will be used to develop new policy in relation to tall buildings as part of the development of the new Royal Greenwich Local Plan.

Creating more sustainable, biodiverse places

- Interest on this theme has been expressed by a varied group of different stakeholders, including individuals, resident associations, general consultation bodies and businesses/landowners.
- Concern was expressed by landowners/developers on the guidance to meet net zero carbon standards on all development in Royal Greenwich, as this exceeds the expectations in the current RBG Local Plan and the London Plan, which refers to Net Zero standards only for major developments.
- Individual comments were also received recommending further reference to biodiversity, Sustainable Drainage Systems (SuDS), water and sewage. Some stakeholders, including the Greenwich Green Party and residents' associations such as the Blackheath Society, would like the SPD to have a more stringent, prescriptive language on all issues to do with retrofit, biodiversity and sustainability.

- Some interesting points have been raised on trees, specifically on the outlined principle of replacing each mature tree with at least two ten-years-old trees and on the preference for native trees in comparison to other species.

Council's response

- In response to the comments on Net Zero standards, the guidance in the SPD has been refined to be fully in line with the London Plan and RBG Core Strategy. The upcoming review of the RBG Local Plan will provide the opportunity to refresh policy regarding sustainability, in line with the Council's aspiration to Net Zero.
- Regarding the language in the SPD, as a supplementary planning document, the SPD relies on design principles and promote a best practice approach. It cannot utilise excessively prescriptive language, which would be misleadingly perceived as informing new policy. Furthermore, the Council is in the process of producing a Climate Resilience SPD which will be used to provide further guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The Council has also recently commissioned a Towards Net Zero Carbon Study along with 17 other boroughs which will be used as an evidence base to develop net zero carbon policies within the new Local Plan.
- Regarding trees, the guidance in the SPD has been refined to clarify that, if younger than 10 years old trees are planted and subsequently die, these should be replaced to ensure the carbon savings are achieved. While native species are the starting point for any intervention, non-native species should not be excluded, where they may positively contribute to biodiversity and ensure long-term ecological establishment.
- Generally, many of the raised issues on biodiversity exceed the scope of the SPD and will be comprehensively addressed by the upcoming Climate Resilience SPD.

Enhancing high streets and shopfronts (Chapter H)

- This part of the SPD has not proved controversial and received a very limited number of comments from stakeholders.

Council's response

- The guidance has been further clarified regarding the necessity of obtaining listed building consent for interventions on the shop-fronts of listed buildings.

Enabling good quality household extensions (Chapter I)

- Limited feedback has been received on this section of the document, mostly from individuals, including professionals in the private sector. The main concern raised is that the defined design principles are too onerous on applicants in terms of acceptable roof forms, loft conversions, bulk and other issues regarding enhancing biodiversity.

Council's response

- The SPD promotes high quality design and is based on design principles rather than prescriptive policies. It encourages best practice approaches on all scales of

development, including household extensions and alterations. Minor changes have been made to this Chapter to ensure that guidance is clear on all forms of extensions, alterations and conversions.

Other general comments

- Comments from individuals and residents' associations asked for further guidance to be included regarding the need for early engagement with local communities for major developments, increase need for enforcement for illicit developments within the borough and the need for public land to not be sold off to private developers.

Council's response

- These issues will be more effectively addressed by other emerging guidance. The Council is developing a new Statement of Community Involvement and associated developer guidance on early engagement with communities. This will encourage developers to conduct early engagement with the local community and amenity groups for developments over a certain size.
- With regards to comments regarding public land being sold off, the issue of land ownership is beyond the scope of the SPD and the planning system in general. Planning can only control the use of the land, rather than its ownership.

Characterisation Study, Tall Buildings Assessment and Heritage Appendix (CSTBA)

- In addition to the issue mentioned above regarding the tall buildings recommendation map extracted from the CSTBA and now removed from the SPD, concern was raised by Historic England and landowners/businesses on the fact that these evidence base documents were not the subject of public consultation before the preparation of the SPD.

Council's response

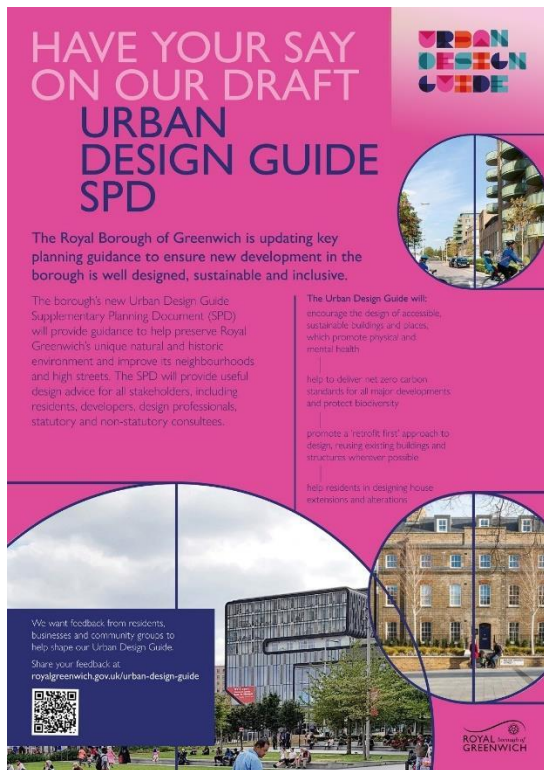
- As evidence-base documents, the Council are not obligated to consult on these separately. Moreover, it is noted that comments on the CSTBA have been accepted as part of this public consultation for the SPD. Finally, the CSTBA will be subject to further, more detailed public scrutiny as an integral part of the upcoming review of Royal Greenwich Local Plan.

Summary

- The preparation of an Urban Design Guide SPD is generally supported. The main objections raised by Historic England and landowners/businesses regarding the elements included in the SPD extracted from the CSTBA have been addressed by removing the parts that could have effectively led to a misleading perception that the SPD would create new policy in contradiction with the current RBG Local Plan. These sections have been replaced with guidance more suitable to the remit of a

supplementary planning document. A significant number of minor improvements have also been made on all subjects, based on the many pertinent comments received.

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



We want feedback from residents, businesses and community groups to help shape our Urban Design Guide SPD. Key proposals from the draft SPD are summarised on royalgreenwichplanning.commonplace.is and you can share your feedback through our online questionnaire. The full draft SPD can also be downloaded from the website.

Please return paper questionnaires by **5pm on Tuesday 11 April 2023** to a member of the library staff or post them to:

Royal Borough of Greenwich Planning Team
Woolwich Centre
35 Wellington Street
Woolwich
London SE18 6HQ

Please use extra sheets of paper if you run out of space on the questionnaire.

Please register at royalgreenwichplanning.commonplace.is to be kept updated about the SPD and other planning policy consultations.

URBAN DESIGN GUIDE SUPPLEMENTARY PLANNING DOCUMENT (SPD) CONSULTATION

Questionnaire

Making better use of land and buildings

You can read more detail about our approach to land use and buildings in chapter B and C of the draft Supplementary Planning Document (SPD).

What do you think of our approach to land use and buildings?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree

Do you have any other comments? If your comments are related to a specific design principle, please state the relevant principle (e.g. principle C.2.2: corridors)

Creating well designed, well connected, inclusive places

You can read more detail about our approach to designing well connected, inclusive places in chapters D, E, F and G of the draft Supplementary Planning Document (SPD).

What do you think of our approach to designing well connected, inclusive places?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree

Do you have any other comments? If your comments are related to a specific design principle, please state the relevant principle (e.g. principle E.3.2: inclusive design)

URBAN DESIGN GUIDE SUPPLEMENTARY PLANNING DOCUMENT (SPD) CONSULTATION

Creating more sustainable, biodiverse places

You can read more detail about our approach to sustainability and biodiversity in chapters B, D, E and I of the draft Supplementary Planning Document (SPD).

What do you think of our approach to creating more sustainable, biodiverse places?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree

Do you have any other comments? If your comments are related to a specific design principle, please state the relevant principle (e.g. principle E.4.3: designing for biodiversity)

Enhancing high streets and shopfronts

You can read more detail about our approach to enhancing high streets and shopfronts in chapter H of the draft Supplementary Planning Document (SPD).

What do you think of our approach to enhancing high streets and shopfronts?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree

Do you have any other comments? If your comments are related to a specific design principle, please state the relevant principle (e.g. principle H.3.2: renewal vs. replacement)

The above shows the questionnaire, email and posters used for this consultation.



Give your views on new planning guide for Royal Greenwich

Published: Friday, 3rd March 2023

We're asking local people, designers and developers to share their views on a new planning guide which will help shape future development in the borough.

The borough's new Urban Design Guide Supplementary Planning Document (SPD) provides detailed guidance on the design of buildings, streets and spaces, which is used to help decide planning applications. It provides advice on the design of household extensions, retail and office developments, and green spaces, alongside key issues such as sustainability, parking, lighting and managing flood risk.



The guide will:

- encourage the design of accessible, sustainable buildings and places, which promote physical and mental health
- help to deliver net zero carbon standards for all major developments and protect biodiversity
- promote a 'retrofit first' approach to design, reusing existing buildings and structures wherever possible
- help residents in designing house extensions and alterations

Cllr Aidan Smith, Cabinet Member for Regeneration, said: "This planning guidance is vital to encouraging sustainable, well designed and inclusive development in our borough, and also protecting our unique natural and historic environment."

"We want to hear from a wide range of people to ensure the SPD reflects your priorities for how development in our borough looks and feels. It's an important part of the vision in Our Greenwich, to make sure our communities feel heard."

Key proposals from the draft SPD are summarised on royalgreenwichplanning.commonplace.is or you can download a copy of the draft SPD. Once you've read more, you can share your views through our questionnaire.

You can also find a copy of the draft SPD and more information on display at the Eltham Centre, Greenwich Centre, Thamesmere and Woolwich Centre libraries. Paper copies of the questionnaires are also available in the libraries.

The consultation is open until 5pm on Tuesday 11 April 2023.

The above shows the SPD being advertised on our website. The link to is available [here](#).


Share your views on our planning guide




We're asking local people, designers and developers to share their views on a new planning guide which will help shape future development in the borough.

[Read more](#)

The SPD was also featured in e-bulltins which was sent to everyone on the council's mailing list.


Royal Borough of Greenwich
 Royal Borough of Greenwich • 3 Mar




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- help residents in designing house extensions and alterations


Read more at royalgreenwichplanning.commonplace.is and share your feedback by 5pm on Tuesday 11 April.


Help shape the planning process in Royal Greenwich
royalgreenwichplanning.commonplace.is

Posted to Subscribers of Royal Borough of Greenwich
 🍌❤️👍 9 • 7,002 Impressions

Like 2 Comments Share


Royal Borough of Greenwich
 Royal Borough of Greenwich • 4 Apr




Remember to share your views on our new planning guide by 11 April

We're consulting on the development of a new planning guide for Royal Greenwich. The borough's new Urban Design Guide Supplementary Planning Document (SPD) provides detailed guidance on the design of buildings, streets and spaces, which is used to help decide planning applications. The guide will:

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The consultation is open until 5pm on Tuesday 11 April 2023.


Help shape the planning process in Royal Greenwich
royalgreenwichplanning.commonplace.is

Posted to Subscribers of Royal Borough of Greenwich
 765 Impressions

Like Comment Share



Royal Borough of Greenwich
 3 March


We want your views on a new planning guide which will help shape future development in Royal Greenwich.

The new Urban Design Guide Supplementary Planning Document (SPD) provides advice on:

- building household extensions
- retail and office developments
- green spaces
- sustainability
- parking
- lighting
- managing flood risk and much more

Tell us your views by 11 April royalgreenwichplanning.commonplace.is




royal_greenwich

royalgreenwich has voted your views on a new planning guide which will help shape future development in #royalgreenwich


The new Urban Design Guide Supplementary Planning Document (SPD) provides advice on:

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- green spaces
- sustainability
- parking
- lighting
- managing flood risk and much more

Tell us your views by 11 April royalgreenwichplanning.commonplace.is

richardwatts is part of the Urban Design Guide allowing large parts of developments to be sold off to foreign investors? How does that benefit the community / economy? 🤔

12 • 3 likes • Reply



The above shows the SPD being advertised on various social media platforms, including: Next Door, Facebook, Instagram and Twitter.

Help shape the planning process in Royal Greenwich

Royal Greenwich values the opinion of all those that live, work, worship, study, and volunteer in the borough. We believe that everyone has an equal and valuable voice, and we want to hear from you on how we can work together to shape and improve areas within the borough through our planning processes.

Keep me updated

Your email will be used to contact you about project updates. You can unsubscribe at any point. Please read our [privacy policy](#).

About the project

Timeline

Latest news

All tiles

The team

ACTIVE PROPOSALS

6 proposals



Completed

Urban Design Guide Supplementary Planning Document (SPD) Consultation

Read more about the consultation



Completed

Creating more sustainable, biodiverse places

Have your say on creating more sustainable, biodiverse places.

24

12



Completed

Enabling good quality household extensions

Have your say on domestic extensions and alterations.

10

3



Completed

Making better use of land and buildings

Have your say on the use of land and buildings



Completed

Creating well designed, well connected, inclusive places

Have your say on creating well designed, well connected, inclusive places



Completed

Enhancing high streets and shopfronts

Have your say on enhancing high streets and shopfronts.

The above shows RBG Website portal for the public consultation on the SPD (in collaboration with Commonplace)

Latest news

Stay involved in the discussion. Keep up to date with the latest news and share it with your fellow community members.

Remember to share your views on our new planning guide by 11 April

We're consulting on the development of a new planning guide for Royal Greenwich. The borough's new Urban Design Guide Supplementary Planning Document (SPD) provides detailed guidance on the design of buildings, streets and spaces, which is used to help decide planning applications. The gui...

📅 Posted on 4th April 2023
👤 by Maddie Cross

Give your views on new planning guide for Royal Greenwich

We're asking local people, designers and developers to share their views on a new planning guide which will help shape future development in the borough. The borough's new Urban Design Guide Supplementary Planning Document (SPD) provides detailed guidance on the design of buildings, stre...

📅 Posted on 3rd March 2023
👤 by Royal Borough of Greenwich



Consultations

Urban Design Guide Supplementary Planning
Closes 11 April

The above shows the SPD being advertised within the press via Greenwich Info.

Appendix B - Representations received and RBG response

Type of respondent	Agent	Name	Questionnaires sections	Chapter	Raised issues	RBG Response
Agent representing Business/Land owner		Berkeley Homes	<i>Creating well designed, well connected, inclusive places</i>	D	Berkeley also supports the inclusion of 'third places' at Principle D.1.8, recognising the importance of supporting existing and future communities in new developments. However, RBG should consider the creation of a borough-wide strategy for third spaces, to ensure that there is sufficient resource to ensure the long-term sustainable management and maintenance of these community spaces.	An issues and options "big themes" consultation for the new Royal Greenwich Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of the Local Plan and to understand how you would like to see Royal Greenwich develop within the new plan period including in regards to "third places" and all types of community spaces.
Agent representing Business/Land owner		Berkeley Homes	<i>Creating well designed, well connected, inclusive places</i>	F	The Urban Design Guide SPD should ensure that it balances the need to conserve areas in the Borough with the need to provide additional services and new homes. As such, Berkeley consider that there are more opportunities to encourage taller buildings in the Borough within the SPD, particularly where they can improve legibility and positively contribute to the character of the area.	Noted. The SPD provides a comprehensive urban design methodology for new developments in Royal Greenwich. It starts from an accurate analysis of Royal Greenwich context and is based on a set of flexible design principles. It is guidance in support of RBG Local Plan and does not introduce new planning policies. To avoid any misleading perception on this point, the section regarding tall buildings in Chapter F has been revised. The Tall Buildings Recommendation Map at page 178 has been removed and replaced with a set of design principles, more in line with the spirit and intent of the SPD.
Agent representing Business/Land owner		Berkeley Homes	<i>Creating more sustainable, biodiverse places</i>	B	RBG should also consider their use of terminology, specifically in Principle B.12 'Reducing Carbon-Impact' and B.14 'Capacity for Future Flexibility' where both principles outline the need to develop net-zero carbon developments, but are inconsistent with RBG's Carbon Neutral Strategy and the adopted policy framework . To ensure compliance with the PPG, Berkeley recommend that this is omitted from the Urban Design Guide SPD and is considered in the emerging Local Plan Review.	Principle B12 has been revised as follows, to be fully in line with London Plan Policy SI 2: " Major development should be designed to net zero standards and set out principles for reducing carbon impact over the full life cycle of the development from conception to end of life/reuse..." A sentence has been added at the end of Principle B12 to specify that "Minor developments are encouraged to follow the same principles as major developments". The last paragraph of Principle B14 has been revised as follows "Net Zero standards should be the aim of all new developments, to avoid future thermal and energy improvement works to be carried out and add to the retrofit burden". It is reminded that the SPD provides guidance only, not policy. It promotes best practice approach for development in RBG.
Agent representing Business/Land owner		Berkeley Homes	<i>Making better use of land and buildings</i>	C	Elsewhere in Chapter C, RBG discuss the benefits of area-based intensification approaches. In Principle C.2.5., RBG note that in areas less sensitive to change, there may be scope for larger buildings (i.e. apartment blocks) that 'are slightly higher than the surrounding housing' noting that these should not exceed the prevailing height by more than one or two storeys. We believe that this is overly prescriptive and does not reflect some of the examples of best-practice shown in the Urban Design Guide SPD, including Figure c.20 of Hackney Wick.	Principle C.2.5 is about "other (generally lower-rise) residential areas" where more substantial changes in height would have a significantly higher impacts on the established character than in more central, high-density areas. This said, paragraph c130 has been revised as follows: "The addition of one or more floors to a building is likely to increase the height of the building overall, which may have an impact on the coherence and character of an area...". Principle C.2.5 has been revised as follows: "In areas that are less sensitive to change there may be scope for larger buildings such as apartment blocks that are slightly higher than the surrounding housing. With their height and scale they should be proportionate and not generally exceed the prevailing height of lower surrounding buildings by more than one or exceptionally two storeys. Any development exceeding this recommendation should be fully justified in urban design, townscape and conservation terms ".
Agent representing Business/Land owner		Berkeley Homes	<i>Creating well designed, well connected, inclusive places</i>	F	F. Building Design As set out above, RBG need to ensure consistency in their use of terminology, particularly in regard to Carbon Neutral and Net Zero Carbon Development. Principle F.1 should omit reference to the requirement for all new development to meet 'net-zero' as this is not required within adopted policy and is non-compliant with the PPG.	Principle F1 has been revised as follows : " All developments must be designed to meet the London Plan in regards to Net Zero Carbon policies, the energy hierarchy and fabric first approach to reduce their energy demand before integrating renewable alternatives (see Principle B.12 Carbon Impact)".
Agent representing Business/Land owner		Berkeley Homes	<i>General comments</i>		Summary Berkeley supports the development of the draft Urban Design Guide SPD and the accompanying evidence base, including the Area Characterisation Studies and Tall Buildings Study. However, we are mindful that, as set out in the PPG, these documents cannot introduce new planning policies which add unnecessarily to the financial burden of new development. In accordance with this, we query whether the SPD, as written, is premature as it places additional requirements on new development proposals, including ambitions for net-zero carbon development and prescriptive greening proposals. As such, Berkeley cannot wholly support the adoption of the Urban Design Guide SPD until it has been amended to ensure that it does not unnecessarily affect the viability of delivering new homes across the Borough.	SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies and are not prescriptive in these terms. To avoid any misleading perception on this point, the section regarding tall buildings in Chapter F has been revised. The Tall Buildings Recommendation Map at page 178 has been removed and replaced with a set of design principles, more in line with the spirit and intent of the SPD.

Agent representing Business/Land owner		Berkeley Homes	<i>Creating more sustainable, biodiverse places</i>	E	<p>Trees. Principle E.4.3 states that developments should replace any lost trees with at least 10 year old replacement trees, and also encourages the use of peatland reinstatement and biodiverse landscaping. Whilst we support the overarching goal to enable carbon capture and enhanced biodiversity, this should be informed by the site's context and cannot therefore be led through prescriptive guidance.</p> <p>For example, we are often advised of the benefits of planting younger trees, particularly as the use of saplings, whips and immature species enable a greater amount of carbon capture through rapid growth and also ensure greater resilience and longevity of this new green infrastructure.</p>	<p>SPDs are non-statutory documents which provide further guidance on policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies and are not prescriptive in these terms.</p> <p>This said, Principle E.4.3 has been revised as follows to take on board part of the raised point: "All developments should seek to retain existing trees and enhance their local existing ecosystem. If trees must be felled, at least 10 year old replacement trees should be planted to ensure equivalent carbon capture capacity. The option of planting younger trees is acceptable only where these are proved to be advantageous in terms of enabling a greater amount of carbon capture through rapid growth and also ensuring greater resilience and longevity of the new green infrastructure. If younger trees are planted and subsequently die, these should be replaced to ensure the carbon savings are achieved. Attrition rates should be factored into the planting regime at inception to avoid the requirement for replacements".</p>
Agent representing Business/Land owner		Berkeley Homes	<i>General comments</i>		<p>Supporting Evidence Base</p> <p>Significantly, the use of these documents, and subsequent critique at a later date, indicates that the adoption of the proposed Urban Design Guide SPD may be premature. Particularly where the Area Characterisation Study and Tall Building Study have informed the key principles on site optimisation and area guidance.</p>	<p>The Characterisation Study and Tall Buildings Assessment (CSTBA) are evidence base documents, which by definition provide some useful information to assist in informing the methodological approach to urban design in the SPD.</p> <p>None of the information extracted from the CSTBA are used in a prescriptive manner in the SPD, but only to facilitate a virtuous design process to deliver sustainable, inclusive developments, well integrated within the places of Royal Greenwich.</p> <p>To avoid any misleading perception on this point, the section regarding tall buildings in Chapter F has been revised. The Tall Buildings Recommendation Map at page 178 has been removed and replaced with a set of design principles, more in line with the spirit and intent of the SPD.</p>
Agent representing Business/Land owner		Berkeley Homes	<i>Making better use of land and buildings</i>	B	<p>Area Characterisation Study</p> <p>Berkeley supports the development of the Area Characterisation Study. However, prior to its use within the evidence base it will need to undergo scrutiny to ensure there are no inconsistencies. An example of which includes Figure 2.2 which incorrectly maps the Crossrail line, linking it to Woolwich Arsenal Station instead of Woolwich Station, which is not included on the map of Public Transport Services. This will impact the recorded distances to transport services and unnecessarily deems the plans out of date, prior to their adoption.</p> <p>Similarly, the plans showing existing building heights at Figure 2.29 and Figure 2.30 will need to be updated to show the current position within the Borough of Greenwich.</p> <p>Chapter 5 of the Area Characterisation Study will also need to be updated to reflect the current position, particularly the opening of the Elizabeth Line Station at Woolwich Station in the Royal Arsenal Riverside. The accompanying text on page 199 states that:</p> <p>'The Town Centre is served by Rail, DLR and in the future Elizabeth Line Services, supporting major development opportunities.'</p> <p>Evidently, this renders the report out of date and will need to be amended to ensure that all recommendations reflect current opportunities within RBG.</p> <p>Moreover, the plans shown at Figure 5.41 and 5.42, showing dwelling density and coherence, do not correctly identify the existing position at Royal Arsenal Riverside and cannot be relied upon to inform the recommendations.</p> <p>Notwithstanding the above, Berkeley support the recommendations for transformative development in Woolwich (Figure 5.45) and proposed corridor improvements along Plumstead Road (Figure 5.46). Berkeley also supports the recommendations to reinforce the prevailing urban character in Woolwich and the Royal Arsenal, enabling infill, selective redevelopment and a modest increase</p>	<p>The information in the Characterisation Study and Tall Buildings Assessment will be used to inform the development of the new Royal Greenwich Local Plan.</p> <p>An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023.</p> <p>We welcome all comments which will help in the development of the new Local Plan and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Agent representing Business/Land owner		Berkeley Homes	<i>Making better use of land and buildings</i>	B	<p>B. Strategic Considerations</p> <p>Overall, Berkeley supports the principles of development as set out in Chapter B. However, whilst the chapter encourages sustainable development and site optimisation, there is a strong emphasis on the protection of existing character areas. It is important to challenge this rhetoric to explore ways to encourage growth that can help to redefine and support the identity of a space, enabling the creation of additional homes within London and without prejudicing the sustainable evolution new development can bring.</p>	<p>The SPD stresses the importance of taking advantage of all opportunities for intensification in Royal Greenwich, while protecting and possibly enhancing the most sensitive, established characters of the different places in the borough.</p>
Amenity Group/ Residents Association		Charlton Central Residents Association	<i>Making better use of land and buildings</i>	B	<p>We are puzzled and alarmed by the disappearance of 'Charlton' in the report. Maps B3 page 31 & B13 page 45, show an area called Vanborough Park but Charlton has been erased. Given the historic importance of Charlton to the borough, not least bearing the name of the borough's main football team, we find it inexplicable that we have been overlooked. This needs to be urgently addressed.</p>	<p>Noted. 'Charlton' has been added to figure maps b.2, b.3 and b.13.</p>
Amenity Group/ Residents Association		Charlton Central Residents Association	<i>Creating well designed, well connected, inclusive places</i>	E	<p>We are at a loss as to how the Council's laudes incentivizing walking (p128), by saying that 'streets are important as public and social spaces and have a bearing on the quality and experience of the urban environment' (p142) and that "street design should first consider the pedestrian" (p148) with the recent actions by the Council to no longer enforce on pavement parking. Currently these important public spaces are cluttered with cars, street signage, shop advertising boards and other obstacles, which have a huge impact on the pedestrian experience.</p> <p>This is particularly true for the elderly and those with young children in buggies.</p> <p>The Council is currently failing in its duty to 'consider the pedestrian' so the aims in this report are disingenuous and misleading.</p>	<p>Noted. Royal Greenwich's recently adopted Transport Strategy, which is acknowledged in the SPD, deals with all these issues in detail.</p>

Amenity Group/ Residents Association		Charlton Central Residents Association	<i>Creating well designed, well connected, inclusive places</i>	F	Whilst welcoming further information on Tall and Large Buildings, the report is still unclear as to what is site specific for heights (F.3 page 178) particularly along Charlton Riverside. The area is defined as a Limited Opportunity Zone (LOZ) Areas with minor potential for modest tall buildings as part of a comprehensive approach to change or renewal' but it is unclear what 'modest' represents and how this sit within the context of the current Riverside Masterplan SPD.	SPDs are non-statutory documents which provide further guidance on policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies To avoid any misleading perception on this point, the Tall Buildings Recommendation Map and associated text at page 178 have been removed and replaced with a set of design principles, more in line with the spirit and intent of the SPD. Further clarification has been provided for "modest tall buildings" on the caption of Image d.8 as "buildings generally between six and ten storeys in height".
Amenity Group/ Residents Association		Charlton Central Residents Association	<i>General comments</i>		On the 3rd August 2022, the Royal Borough of Greenwich made two Article 4 Directions. One of these was 'A non-immediate Article 4 Direction to withdraw the permitted development right to change from a use falling within Class E (commercial, business and services uses) of the Town and Country Planning (Use Classes) Order 1987 (as amended) to a use falling within Class C3 (dwellinghouse) of that order.' Representations were to be submitted by 16th September 2022. This was to impact on Shopping parades and other retail outlets where owners were planning to turn retail units into residential units. Has this been implemented?	The Council will decide whether to confirm the Article 4 Direction to remove this permitted development right in June 2023. As a 'non-immediate' Article 4 Direction, if it is confirmed it will be in August 2023, which is 12 months after the Direction was originally made. From this date, planning permission would be required to change from a Class E use to residential within the areas covered by the Direction. The Council can only confirm 'non-immediate' Article 4 Directions after 12 months to prevent compensation claims by landowners or developers".
Amenity Group/ Residents Association		Charlton Central Residents Association	<i>Creating well designed, well connected, inclusive places</i>	F	We are concerned with the use of tall buildings as 'Landmarks', especially those identified along the Woolwich Road. If the purpose of a landmark is to help to navigate around an area, then there are better aesthetical and practical ways of achieving this then putting up tall buildings. Good signage has stood the test of time in providing landmarks and there is no justification for tall buildings being used for this purpose. Ten storey buildings along the Woolwich Road is unacceptable, especially given the current typography by Charlton Station.	The Tall Buildings Assessment (TBA) and the UDG SPD are clear about the fact that the height of new buildings should always be meaningful and proportionate to their role within context. To avoid any misleading perception that the SPD could create new policy in advance of the new Royal Greenwich Local Plan, the section regarding tall buildings in Chapter F of the SPD has been revised. The Tall Buildings Recommendation Map at page 178 has been removed and replaced with a set of design principles, more in line with the spirit and intent of the SPD. The Tall Building Assessment evidence base will be used in the development of the new Royal Greenwich Local Plan. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Amenity Group/ Residents Association		Charlton Central Residents Association	<i>Creating well designed, well connected, inclusive places</i>	E	Pavements are frequently left in a very poor state, following private companies working on understreet activities. There will be poor quality tarring, which doesn't match with the surrounding pavement, dips, where pools of water gather, bumps where people can trip. There needs to be a requirement and enforcement that companies ensure pavements are returned to a good state.	This issue exceeds the scope of the Urban Design Guide, which is guidance only. The recently adopted Royal Greenwich Transport Strategy addresses the raised issues. In addition, the new Royal Greenwich Local Plan can provide the opportunity to introduce new policies that can deal with the enforcement issues outlined in the comment. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Amenity Group/ Residents Association		Charlton Central Residents Association	<i>Creating well designed, well connected, inclusive places</i>	E	Pedestrian lights - If the council really want to improve the pedestrian experience, this could be achieved by re-setting all pedestrian crossing lights to change within 5 seconds of a pedestrian pressing the button. Pedestrians often have to wait over a minute before lights change. This is particularly noticeable on Woolwich Road, Charlton near Marks and Spencers, but it is also the case across the borough. This is not referring to crossings at traffic lights where several lanes of traffic have to be accommodated.	This issue exceeds the scope of the Urban Design Guide, which is guidance only. Traffic signals are under the control of Transport for London. This said, the new Royal Greenwich Transport Strategy includes a range of measures to help encourage walking, cycling and public transport, including pedestrian safety, in line with the London Plan Policy T2 - Healthy Streets.
Agent representing Business/Land owner	Avison Young	Defence Infrastructure Organisation (DIO) Owners of Royal Artillery Barracks (RAB)	<i>Making better use of land and buildings</i>	B	B) Strategic considerations General comments This section of the UDG sets out the key strategic considerations for development within RBG. The DIO is supportive of the key principle set out in Principle B.1.1 to support sustainable growth within the borough. However, this section appears to repeat policies already contained within the London Plan and/or the Core Strategy. For instance, Principle B.3 on responding to accessibility by public transport directs higher density development to areas with a PTAL of 3 and above or within 800 metres of a rail, DLR or tube station, which repeats elements of London Plan Policies H1, D2 and D3. In our view, it is likely to be better to set out such key strategic principles through a new Local Plan, where these strategic principles would carry more weight. As presented, it has the potential to cause some confusion with the current Core Strategy.	Principle B3 complies with London Plan policy and the principles set out in the Core Strategy. Some minor repetition of policy is unavoidable to ensure that guidance is clear.

Agent representing Business/Land owner	Avison Young	Defence Infrastructure Organisation (DIO) Owners of Royal Artillery Barracks (RAB)	<i>Creating well designed, well connected, inclusive places</i>	F	<p>F) Building design</p> <p>We suggest that building design, layout and height is informed by a townscape character assessment of the surrounding area to identify existing height datums, street patterns and urban morphology or how the areas has developed historically. In accordance with the Principles 8.5 on density and 8.8 on topography it will be beneficial to identify opportunities where development exceeds the existing height datum in situations such as important nodes and gateways or environmental factors such as topography which can also influence building heights. We would recommend that the determination of building heights and scale should be influenced and informed by an assessment of viewpoints and a heritage study.</p> <p>In this regard, we also consider that the principle that variations of height at corners should not normally be more than one floor is overly prescriptive and ignores context, and a measure that is informed by townscape views and is more relative to the scale of a building should be used instead.</p>	<p>Noted. Chapter F has been revised in a way to avoid the misleading perception that the SPD could create new policy in advance of the new Royal Greenwich Local Plan. The Tall Buildings Recommendation Map at page 178 has been removed and replaced with a set of design principles, more in line with the spirit and intent of the SPD.</p> <p>The Tall Building Assessment evidence base will be used in the development of the new Royal Greenwich Local Plan.</p> <p>An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023.</p> <p>We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Agent representing Business/Land owner	Avison Young	Defence Infrastructure Organisation (DIO) Owners of Royal Artillery Barracks (RAB)	<i>Creating well designed, well connected, inclusive places</i>	F	<p>Principle F.3 sets out the principles for the provision of tall and large buildings, a large building being defined as one which is twice the context height. It states that the development of tall buildings (those of 30 metres or more in height) will only be appropriate in locations identified in the Royal Borough Tall Buildings Study (2021). We do not consider it to be the role of guidance to set out appropriate locations for tall buildings, which should be set out in the development plan in line with London Plan Policy D9. We consider that the inclusion of this prescription also ignores the balanced approach to the development of tall buildings outside of these areas as established by the Master Brewer Judgment and as set out in London Plan Policy D9. In any case, Figure f.4 appears to exclude areas where there are already tall buildings from Tall Buildings Zones, such as large parts of Woolwich Town Centre.</p> <p>The site is not included within a Tall Building Zone, which we consider is appropriate considering its sensitive historic environment. However, the principles should not preclude the development of larger buildings on the site, considering it is identified for intensification, and noting the considerable variation in character across the site. The provision of such buildings should be informed by evidence such as a townscape character assessment, landscape visual impact assessment and a heritage study. We would recommend that heights and scale and massing is explored using a qualitative approach that encourages variation and richness of the building line and roofscape, appropriate within the context. As such, notwithstanding our concern about tall buildings, it is welcome that the principles do take a nuanced approach to the provision of large buildings, which are likely to be required to achieve appropriate densities on the site.</p>	<p>Noted. Chapter F has been revised in a way to avoid the misleading perception that the SPD could create new policy in advance of the new Royal Greenwich Local Plan. The Tall Buildings Recommendation Map at page 178 has been removed and replaced with a set of design principles, more in line with the spirit and intent of the SPD.</p> <p>The Tall Building Assessment evidence base will be used in the development of the new Royal Greenwich Local Plan.</p> <p>An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023.</p> <p>We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Agent representing Business/Land owner	Avison Young	Defence Infrastructure Organisation (DIO) Owners of Royal Artillery Barracks (RAB)	<i>Making better use of land and buildings</i>	B	<p>Density and walkable neighbourhoods</p> <p>Principles 8.4 and 8.5 on creating walkable neighbourhoods and delivering an appropriate density and would apply to much of the RAB Woolwich site. We would recommend that where areas are currently uncategorised that evidence of walking distances to facilities can be provided to demonstrate a walkable neighbourhood and that b.27 includes cultural and leisure uses as part of the key facilities that could support the 15-minute city.</p>	<p>Noted. It is understood that every proposal for new development should be supported by a strong evidence base, including regarding walking distances to key facilities, which should be carefully considered by the Council and assist in informing its response to the proposals. The SPD is not contradictory with this principle in any part.</p> <p>Cultural and leisure uses have been added to the list at b.27.</p>
Agent representing Business/Land owner	Avison Young	Defence Infrastructure Organisation (DIO) Owners of Royal Artillery Barracks (RAB)	<i>Making better use of land and buildings</i>	B	<p>Green and Blue infrastructure and biodiversity</p> <p>The DIO welcomes the emphasis on positive planning to improve open spaces, green and blue infrastructure and biodiversity within the borough. The RAB Woolwich site represents a key opportunity for bringing forward improvements to open space, with the potential for development in the area to support significant improvements to the quality of the existing green and open spaces.</p> <p>Principle 8.11 could be strengthened by considering how constrained developments might be able to deliver improvements to biodiversity beyond the red line boundary of their site, such as through biodiversity net gain mitigation, which could be used to help enhance spaces like Woolwich Common. The importance of taking an evidence-based approach to balance the multiple benefits of green and open spaces in providing amenity and recreation, social cohesion, movement and connectivity, biodiversity net gain and SUDs should also be recognised in Principle 8.10.</p> <p>Reducing carbon impact, smart cities, resilience and retrofit</p> <p>Principles 8.12 to 8.15 set out how development within RBG can reduce its carbon impacts and respond to future challenges. The DIO is supportive of the key principles with respect to reducing carbon impacts, smart cities, resilience and retrofitting.</p> <p>Principle 8.12 states that "existing buildings must be retrofitted to reduce their carbon emissions to net zero equivalent". The intent of the wording appears to be applied only where buildings are being retrofitted; this should be revised as clearly the UDG cannot prescribe that all existing buildings must be retrofitted.</p> <p>Principle 8.15 establishes very welcome principles on considering the retention of existing structures first. The RAB Woolwich site contains a range of buildings</p>	<p>RBG is currently preparing a Climate Resilience SPD, which will provide detailed guidance on all issues regarding biodiversity, reducing carbon impact, smart cities, resilience and retrofit.</p> <p>Principle 8.12 has been refined to avoid any misunderstanding on retrofit of buildings.</p> <p>Principle 8.15 does not preclude the demolition of existing buildings. It only establishes a retrofit-first approach for the Royal Borough, when it proves viable and more sustainable than other options. As stated on paragraph b.87, "...Before demolishing, reuse should always be considered to determine if it is a viable option..."</p>

Agent representing Business/Land owner	Avison Young	Defence Infrastructure Organisation (DIO) Owners of Royal Artillery Barracks (RAB)	<i>Making better use of land and buildings</i>	B	<p>Responding to local character</p> <p>Principle B.6.2 considers the outcomes of the Royal Borough of Greenwich Characterisation Study, which identifies the site as primarily falling within an area that is “highly sensitive to change”. The principles set out in b.41 set out that “even a small departure from the set of common character features may stand out, detract and harm the character” of the place.</p> <p>We would question the evidence base for this. Figure b.7 suggests that the whole of the northern part of the site (apart from Woolwich Common) is “highly sensitive to change”; however, the Characterisation Study (March 2023) that informs this does not characterise the RAB Woolwich site at all. The site is identified within the Study for “reinforcement” of a sensitive/highly sensitive character, suitable for “contextual development” which is less prescriptive compared to the principles set out in B.6.2. Notwithstanding this, we would question whether it is appropriate to consider the site as having a consistent character at all, given its size and the diversity of its built environment. We contend that whilst the character of RAB Woolwich is highly sensitive to change, it also comprises areas of low-quality development and land, as well as modern development and open space. Some of these areas will be much less sensitive to change than others. As currently worded within b.41 and the main principles box, we are concerned that this would place a significant constraint on the design of future development proposals to align with a perceived consistent character that does not exist. We would welcome a recognition that the areas identified within the UDG for intensification – and particularly large-scale institutional areas – may have a varied character and so may not be consistently highly sensitive to change, and that intensification should therefore be appropriately informed by evidence, including townscape, heritage and views assessment. At present the wording of these principles are inconsistent with the</p>	<p>The northern area of the site has been identified as highly sensitive because of the Grade II* barracks’ historic and architectural value. There are also a number of other designated heritage assets on site and the whole site falls within the Woolwich Common Conservation Area.</p> <p>While it is understood that parts of the site include buildings of limited architectural/historic value, nevertheless they sit within the setting and the close proximity of heritage assets. Redevelopment of the site is supported, but it should be undertaken in a very considerate manner, to not detract from the existing heritage assets on the site.</p> <p>Therefore, it is considered that the terms “highly sensitive to change” is correct for this site. This is in consideration of the barracks sensitivity to changes in their immediate surroundings, which would be a departure from the established character for the area, defined by relatively consistent parapet heights and grain of buildings in the background of the listed building.</p> <p>The discrepancies with the maps in the Characterisation Study are due to an error at printing stage of the GIS file. This issue has now been addressed and the map in the Characterisation Study replaced.</p> <p>It has now been verified that the layers indicating the level of sensitivity associated with the Royal Artillery Barracks were erroneously switched-off in the printing of the maps included in the Characterisation Study.</p> <p>This will be corrected in the next version of the Characterisation Study.</p>
Agent representing Business/Land owner	Avison Young	Defence Infrastructure Organisation (DIO) Owners of Royal Artillery Barracks (RAB)	<i>Making better use of land and buildings</i>	C	<p>Principle C.2.6 on institutional areas applies to the RAB Woolwich site as an Army barracks. It establishes at c.138 that “development should seek the intensification of underused institutional sites” for a mix of development. The principles text establishes the importance of integrating institutional assets within the wider community and establishing a distinct character, and the importance of integrating heritage and landscape assets into development. One of the key challenges at RBG is the highly enclosed nature of the site and the scale of the Main Barracks Building, which need to be sensitively integrated this into future development and the surrounding area. It is welcome that the UDG recognises this as an issue.</p> <p>The DIO welcomes the support offered by the UDG for the intensification of the site, and the principles provide clear guidelines for its future development whilst also being broadly supportive of sensitive intensification and a flexible range of uses. We would suggest that there is some inconsistency with Principle B.6.2 that identifies the site as highly sensitive to change, and which could be reconciled by noting the need for more flexibility on sites identified for intensification.</p>	<p>The site has been identified as highly sensitive because of a number of designated heritage assets on site and the fact the whole site falls within the Woolwich Common Conservation Area. This is reflected in principle B.6.2 and principle C.2.6 and there is no contradiction between these two principles. Neither principle precludes the redevelopment of institutional sites that optimise density while effectively integrating the new buildings with the existing heritage assets on the site and its surroundings. Principle C.2.6 specifies that on highly sensitive areas, “Development...will need to respond with a highly contextual design that is site specific and responds to relevant and defining area wide design characteristics, considering the prevailing pattern, scale, height of buildings...”.</p>
Agent representing Business/Land owner	Avison Young	Defence Infrastructure Organisation (DIO) Owners of Royal Artillery Barracks (RAB)	<i>Making better use of land and buildings</i>	B	<p>Heritage</p> <p>We welcome the inclusion of heritage as a key consideration within the UDG at Principle B.7, and in conjunction with RBG officers the DIO is seeking to set out a “positive strategy” for enhancing and avoiding harm to the heritage assets on the RAB Woolwich site.</p> <p>However, the principle is focused on development that affects the setting of heritage assets, and does not explore how heritage assets might be brought into future viable use, in line with paragraph 190 of the NPPF.</p> <p>Given the number of heritage assets on the RAB Woolwich site, we would welcome guidance that sets out support for preserving and/or enhancing heritage assets and bringing them into flexible and viable use as part of the comprehensive redevelopment of sites. We would welcome a principle that was supportive of using townscape and visual impact assessments and landscape visual impact assessments to understand any sensitive views and inform development in terms of building height, scale and massing, particularly on large-scale master planned sites.</p>	<p>The SPD only provides high-level guidance on heritage.</p> <p>This said, a paragraph has been added to Section B7 to specify that in line with Historic England guidance, constructive conservation is supported to reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment.</p> <p>The Royal Greenwich Core Strategy and Conservation Area appraisals provide further insight on the recommended approach to conservation and heritage in Royal Greenwich.</p>
Agent representing Business/Land owner	Avison Young	Defence Infrastructure Organisation (DIO) Owners of Royal Artillery Barracks (RAB)	<i>Creating well designed, well connected, inclusive places</i>	D	<p>Principle D.1.5 establishes broad principles for scale and massing, noting that “development can often achieve positive densities through more compact development rather than increased height”. The key principles established in this area are broadly supported. However, as on the RAB Woolwich site, where there are significant topographical or environmental constraints achieving an optimal density may be challenging through compact development. We also suggest that this led by townscape character assessment and is contextually appropriate.</p> <p>Views of heritage assets would also need to be considered. We would welcome recognition of the need for an evidence-led approach on large-scale sites identified for intensification, such as RAB Woolwich.</p>	<p>The SPD provides high-level guidance and is based on a methodology that starts from a comprehensive context analysis and careful consideration of the potential impact created by new proposals on their surroundings.</p> <p>Therefore, it recognises that besides the key design principles established in the document, there should also be an assessment of each development proposal on its own merits. This includes, among other factors, the assessment of its potential impact on heritage and townscape and other gathered evidence.</p>

Agent representing Business/Land owner	Macey & Co	Derreb Limited	<i>Characterisation Study, Tall Buildings Assessment and Heritage Appendix</i>		The density map extracted from the Characterisation and Tall Buildings Study (CTBS) shows an indicative density of 51-75 units per hectares. Based on previous negotiations with the Council for this 2.2 hectares site, the owner recommends that this density should be increased to 76-100 units per hectares.	The map in question (at page 35) regards the existing dwelling density in the borough. Its caption will be revised to clarify this.
Agent representing Business/Land owner	CBRE	GLI VIP Trading Estate, Anchor and Hope Lane, Charlton	<i>Creating well designed, well connected, inclusive places</i>	E	The Urban Design Guide in point E.19, identifies three Principal Street Types, which are considered to be the starting point to the design of streets. GLI agrees with the principle of these street types but suggests that suitable flexibility (especially for road widths) is maintained to ensure local access is maintained for larger vehicle types that require access to existing industrial land uses in the area.	A paragraph has been added to e.20, recommending that "the design of all street types should be carefully tailored to the different local situations in line with RBG Local Plan and Highway, Traffic and Transport Strategy and all other relevant guidance and standards. It should ensure adequate access to all service/emergency vehicles".
Agent representing Business/Land owner	CBRE	GLI VIP Trading Estate, Anchor and Hope Lane, Charlton	<i>Making better use of land and buildings</i>	C	The Charlton Riverside area is located within a Strategic Development Location. However, Charlton Riverside continues to perform an important function as an industrial area and a source of major employment, and despite its location within an SDL, should continue to serve, as part of a broader mix of uses, as an industrial location into the future. As such, para. C.151 should remove reference to " unless in areas identified as strategic development locations ". It is GLI's strong view that the Charlton Riverside location can serve to bolster and intensify industrial uses, whilst still fulfilling the key principles of the adopted Charlton Riverside SPD for a wider mix of uses, and creation of new employment opportunities and jobs.	Noted. C.151 (now C.152) has been revised as follows: Development in industrial areas should aim to make more efficient use of land for industrial and light industrial uses, to minimise externalities and impacts from traffic, noise, odours and pollution onto neighbouring areas, and to enhance the quality of the environment and the provision with facilities and amenities for workers.
Agent representing Business/Land owner	CBRE	GLI VIP Trading Estate, Anchor and Hope Lane, Charlton	<i>Characterisation Study, Tall Buildings Assessment and Heritage Appendix</i>		GLI believe that greater latitude should be given to the development of the Charlton Riverside Masterplan, and given the scale of the site and the types of proposed employment uses, building heights can be determined by an analysis of context and the lack of sensitivity to change, rather than by being too prescriptive (i.e. stating that development shouldn't normally be one or two storeys above existing – this may be more appropriate to established residential locations).	The high-level guidance provided in the Urban Design Guide is broadly in line with that in the current Charlton Riverside SPD. The development of the new Royal Greenwich Local Plan will provide further opportunity for shaping a long term vision for the places of Royal Greenwich. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Agent representing Business/Land owner	CBRE	GLI VIP Trading Estate, Anchor and Hope Lane, Charlton	<i>Characterisation Study, Tall Buildings Assessment and Heritage Appendix</i>		In response to the transformation and placemaking principles...as defined in the Characterisation Study evidence base, GLI agree that a phased masterplan approach to be appropriate. In addition, GLI also concur that new and improved infrastructure connections should be a primary objective, helping to enhance accessibility through Charlton Riverside and create a high-quality sense of place. However, GLI consider that a separation of residential and industrial uses in this location is appropriate, allowing any proposed industrial and logistics focussed development to operate and function successfully. A degree of separation through infrastructure and landscaping would offer industrial occupiers flexibility of operation through 24-hour use, with enhanced site security, whilst protecting residential amenity. However, a masterplan approach could also include areas of lighter industrial use (such as workshops and creative spaces) specifically where any proposed industrial and residential areas coincide. To enable the viable, comprehensive, cohesive regeneration and renewal of such a large area, flexibility over use and layout must be allowed for. Successful placemaking is perfectly achievable without wholesale merging and mixing of uses across the Charlton Riverside location.	The information in the Characterisation Study and Tall Buildings Assessment will be used to inform the development of the new Royal Greenwich Local Plan. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of the new Local Plan and to understand how you would like to see Royal Greenwich develop within the new plan period.
Agent representing Business/Land owner	CBRE	GLI VIP Trading Estate, Anchor and Hope Lane, Charlton	<i>Making better use of land and buildings</i>	C	GLI note that item c11 of section C1.1 refers to only considering demolishing and rebuilding existing built form as a last resort – this clause should be qualified to allow due weight to the development of comprehensive masterplans on sites shown as being suitable for Transformation and acknowledged as having a low sensitivity to change.	The SPD has a focus on sustainability and advocates a retrofit-first approach. This means that all existing buildings should be carefully assessed in terms of their historic and architectural value, their structural conditions and comparative advantages in sustainability terms of retrofitting them or alternatively demolishing and replacing them with new buildings. This high-level guidance does not preclude that the advantages provided in sustainability terms by well-designed masterplans can be used as one of the justifications for the demolition of existing buildings, specifically on the identified transformation areas.
Political party		Greenwich Green Party	<i>Creating more sustainable, biodiverse places</i>	B	It would be good to have a definition of sustainability in B1–B2, preferably one that flags up the overwhelming imperatives to decarbonise and to work with nature.	The following definition of Sustainability is now provided in Section B.1 "Sustainable development is development that meets the needs of the present generation without compromising the ability of future generations to meet their own social, economic and environmental needs. To achieve sustainable development, the development industry needs to implement sustainable design and construction practices. This is the careful consideration of how the design, building services and project management from inception can influence the amount of resources used during a development's construction, occupation and management".
Political party		Greenwich Green Party	<i>Creating more sustainable, biodiverse places</i>		In particular, we believe that using native species should be obligatory rather than preferable, given the impact on wildlife and biodiversity. Similarly, removing mature trees should be ruled out unless in genuinely exceptional cases: it is clear that replacement, even with ten-year old trees as the guidance recommends, will in practice not make up for the loss of embodied carbon or of habitat.	Best planting practices require a "right species in the right location" approach and in many cases this will be native species. However, consideration must be given to ecological resilience and a changing climate, where non-native species may positively contribute to biodiversity and ensure long-term ecological establishment. A blanket ban on non-native species would therefore be too restrictive in this regard. Fundamentally, each planting regime must consider species suitability on a per case basis. Principle E.3.5 is clear about the importance of retaining existing trees as much as possible to shape the form of new development. The development of the new Royal Greenwich Local Plan will provide the opportunity to address this issue more in detail.

Political party		Greenwich Green Party	<i>Making better use of land and buildings</i>	B	In b.21 we would suggest replacing the word "compel" (Designing neighbourhoods to 15-minute principles should compel more people to walk and cycle) with "encourage", to avoid feeding claims by opponents that 15-minute neighbourhoods are an authoritarian proposal.	Noted. "Compel" has been replaced with "encourage" in b.21.
Political party		Greenwich Green Party	<i>Creating well designed, well connected, inclusive places</i>	E	The principles set out in E.3.8 on SUDS are welcome and forward-looking. It should be clear that paving over front or back gardens, or use of artificial grass, is not acceptable.	Noted. A paragraph has been added to E.3.8 stating that "Large areas of hard surface paving or artificial grass are not encouraged on communal gardens, front and rear gardens. Sustainable, permeable paving should be used where hard surfacing is needed". This issue is further addressed in Chapter I - Household Extensions and Alterations.
Political party		Greenwich Green Party	<i>Creating more sustainable, biodiverse places</i>	B	We welcome references to the biodiversity net gain obligation. We recommend that large developments in particular should be looking to maximise biodiversity rather than simply meeting the 10% threshold. It is not clear from the text when the 10% threshold will come into operation: we would strongly recommend that it be imposed right away. It is also important that all developers should be required to have a monitoring and maintenance plan for green aspects. Too many saplings in new developments die from lack of care.	Paragraph b.68 has been revised to acknowledge that the new legal requirement for a Biodiversity Net Gain (BNG) of 10% will come into force in November 2023. For further, detailed guidance on sustainability, the Council is in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030. The council has also recently commissioned a Towards Net Zero Carbon Study along with 17 other boroughs which will be used as an evidence base to develop policies within the new Royal Greenwich Local Plan.
Political party		Greenwich Green Party	<i>Creating more sustainable, biodiverse places</i>	G	We were pleased to see references in the Document to a number of key climate, biodiversity and environmental issues...However, we believe the document would be considerably strengthened by making these references more directive. They are mostly phrased in terms of a recommendation to consider issues, or to follow guidance "as far as practicable" or "whenever possible". They would be better put in a more directive way so that it is clear these are obligations on those proposing development rather than recommendations... ...It is clear from the first year review on the Council's Carbon Neutral Plan that use of gas in residential properties accounts for a significant part of the Borough's greenhouse gas emissions and that progress in reducing them is slow. The Document is an opportunity to ensure that new or redeveloped properties are fully in line with the urgent need to reduce emissions. There is a reference in G.2.3 to PassivHaus principles, but this could usefully be referenced in a much more prominent way as a set of principles that should be followed as a matter of course in housing design and retrofit.	The SPD provides high-level guidance on urban design related issues. SPDs are non-statutory documents which provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period, including regarding biodiversity and carbon impact. The council is also in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030. The council has also recently commissioned a Towards Net Zero Carbon Study along with 17 other boroughs which will be used as an evidence base to develop policies within the new Royal Greenwich Local Plan. The study includes the use of air source heat pumps in meeting the net zero standards in the London Plan.
Political party		Greenwich Green Party	<i>Making better use of land and buildings</i>	B	The Document touches on the question of affordable housing (Principle B.1.2 and c.91). It should be clear that it is a requirement (rather than optional) to increase the amount of affordable housing in new developments and estate regenerations. Ideally the Document would set specific targets around affordable housing and also set specific requirements for amenities such as Doctors' surgeries: Greenwich Peninsula, for example, has one of the highest ratio of population to GPs in the country.	This exceeds the SPD's mandate. The development of the new Royal Greenwich Local Plan will deal with this issue. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Political party		Greenwich Green Party	<i>Making better use of land and buildings</i>	B	B3 could usefully set out more clearly how the challenge of accessibility in areas of the Borough with less access to public transport can be overcome (which must include working with TfL to maintain and extend bus routes and in the longer run to extend rail networks; and creating foot/cycle links between these areas and existing transport hubs).	This issue exceeds the mandate of the SPD. It will be addressed by the development of the new Royal Greenwich Local Plan. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Political party		Greenwich Green Party	<i>Creating well designed, well connected, inclusive places</i>	F	f.122 "strongly encourages" use of materials that support biodiversity. Similarly i.40 encourages the use of bee, bird and bat bricks in house extensions. We recommend that incorporation of swift bricks and, wherever feasible, of other nature-friendly features, should be compulsory in new buildings.	This issue will be addressed more in detail by the Climate Resilience SPD, currently under preparation, which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030.
Political party		Greenwich Green Party	<i>Creating more sustainable, biodiverse places</i>	E	The Document rightly reflects that some parts of the Borough are poorly supplied with green space, but the guidance does no more than recommend that this be taken into account in development planning (e.78). We believe there is a need for a plan for the extension of green space in these areas, and for the creation of a more coherent, joined up network of green spaces across the Borough as a whole, to ensure that this important aspiration is realised in practice. It is not clear how the need for intensification (chapter C) will be resolved in a way that is compatible with maintenance and expansion of green spaces. This too speaks to the need for an overarching strategy rather than a piecemeal, development by development approach.	This issues will be addressed more in detail in the new Royal Greenwich Local Plan. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.

Agent representing Business/Land owner	Avison Young	Gunnery Properties and (C&P Woolwich)	<i>Making better use of land and buildings</i>	C	<p>Town Centre</p> <p>Given that the Site is within Woolwich town centre, the approach to industrial intensification wholly fails to consider other non-employment generating uses in such locations in Principles C.2.3 and C.2.8.</p> <p>For the above, and following, reasons, we have significant objections to the adoption of the SPD without substantial revisions and clarifications.</p> <p>Given that the current designation of the Site is a non-designated industrial site, the support for non-industrial uses is acknowledged in Principle C.2.8. However, the postamble to the Principle C.2.8 fails to explicitly support that uses other than industrial can be included in an intensified scenario. This is particularly key given that the Site is also within a town centre, in which a much wider scope of uses (as defined in the NPPF) are acceptable.</p>	<p>As outlined in the raised point, Principle C.2.8 specifies that "Where the proposed development on non-designated industrial sites includes non-industrial uses, this should ensure that appropriate design mitigation is provided, considering the safety and security of operations, vibration and noise and air quality, and that the agent of change principle is applied".</p> <p>This chapter regards the intensification of industrial uses. Regarding the density of other uses and specifically residential uses, this should be the outcome of a design driven process, in line with the London Plan, Policy GC2 - Point D. This said, generally sites within town centres are by definition associated with higher densities than those outside of them, exception made for sensitive historic contexts.</p>
Agent representing Business/Land owner	Avison Young	Gunnery Properties and (C&P Woolwich)	<i>Making better use of land and buildings</i>	C	<p>Industrial Intensification</p> <ul style="list-style-type: none"> The broad principles of industrial intensification are supported. Section C.2.8 fails to acknowledge the approaches in London Plan Policy E7 for industrial intensification on non-designated industrial sites (as per the current designation), or on LSIS' through masterplan-led approaches 	<p>The following reference has been added to c.152 : "See London Plan Policy E7 for both designated and non-designated industrial areas".</p>
Agent representing Business/Land owner	Avison Young	Gunnery Properties and (C&P Woolwich)	<i>Characterisation Study, Tall Buildings Assessment and Heritage Appendix</i>		<p>Tall Buildings</p> <ul style="list-style-type: none"> The Council's approach to identifying locations that are suitable for tall buildings is unclear – particularly in Section 7.2 of the Tall Building Assessment (2023). If it is concluded that the Site falls within an area suitable for a tall building – a minimum of 12 storeys should be accepted in this location. The Council's definition of a tall building is overly complicated and fails to relate to specific localities The Council's Urban Design SPD – in Principle F.3 – refers to a Tall Building Study document which does not form part of the current consultation <p>Avison Young (UK) Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS 4</p> <ul style="list-style-type: none"> As a result of the assessment methodology and the Council's conclusion, the exclusion of the Site from Tall Building Cluster (CL5.4) is unfounded. Instead, the Site should be included in the Cluster 	<p>The tall buildings assessment is part of the evidence base that will support the development of the new Royal Greenwich Local Plan, which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p> <p>To avoid any misleading perception that the SPD could create new policy in advance of RBG Local Plan review, the section regarding tall buildings in Chapter F has been revised.</p> <p>The Tall Buildings Recommendation Map at page 178 has been removed and replaced with a set of design principles, more in line with the spirit and intent of the SPD.</p>
General and specific consultation bodies		Historic England	<i>Making better use of land and buildings</i>	B	<p>Section B.7: We strongly welcome this section and its emphasis on proper understanding of heritage significance in developing proposals. We consider that para b.49 could go further in reflecting NPPF para 197 and London Plan policy HC1 by encouraging proposals to use heritage significance to shape the design of new development rather than simply avoiding harm.</p>	<p>A paragraph has been added to Section B.7, encouraging proposals to use heritage significance to shape the design of new development rather than simply avoiding harm.</p>
General and specific consultation bodies		Historic England	<i>Enhancing high streets and shopfronts</i>	H	<p>Section H Shopfronts. We would suggest highlighting the legislative framework and that changes to listed buildings will require listed building consent, while new shopfronts are in general likely to require planning permission and advertising consent. This section could also highlight the role of conservation area appraisals and management plans in respect of defining what is special about local character and appearance and what should be conserved.</p>	<p>A paragraph has been added to the Conservation Matters section at page 221, acknowledging that in addition to planning permission for any alteration to shop fronts which would materially change the appearance of the premises, changes regarding listed buildings require listed building consent.</p>
General and specific consultation bodies		Historic England	<i>Enabling good quality household extensions</i>	I	<p>Section I.1.1: Reference should be included to Archaeological Priority Areas to establish whether archaeology is a consideration that requires consultation.</p>	<p>Agreed. A reference to Areas of High Archaeological Potential in the current RBG Core Strategy has been added to Section I.1.1 to establish whether archaeology is a consideration that requires consultation.</p>
General and specific consultation bodies		Historic England	<i>Creating well designed, well connected, inclusive places</i>	E	<p>Section E.1: We would suggest that Historic England advice (see Streets for All Historic England) could be included in this section, as could guidance from the Mayor of London (Public London Charter GLA)</p>	<p>Agreed. References to Streets for All Historic England have been added to Section E.1.</p>
General and specific consultation bodies		Historic England	<i>Making better use of land and buildings</i>	B	<p>Section B.15: We note and welcome the emphasis on retrofit in this section. Nevertheless, we consider that it should be made clear that historic buildings may need different and non-standard interventions to reduce energy consumption and carbon emissions to avoid effects on significance. This should include reference to assessment and understanding of where buildings are currently deficient and that minimal or non-invasive approaches should be the starting point of an iterative strategy. Historic England advice on this subject can be found here: Energy Efficiency and Traditional Homes Historic England – this could also be added to the Further Guidance section.</p>	<p>Noted. A paragraph has been added to section B15 stating that: "historic buildings may need different and non-standard interventions to reduce energy consumption and carbon emissions to avoid effects on significance. This should include a comprehensive assessment and understanding of where buildings are currently deficient. Minimal or non-invasive approaches should be the starting point of an iterative strategy.".</p> <p>A reference to Energy Efficiency and Traditional Homes Historic England has been included.</p>

General and specific consultation bodies		Historic England	<i>Creating well designed, well connected, inclusive places</i>	D	Section D.1.1: We welcome this section and the approach set out to the placemaking process. We would suggest however, that Principle D.1.1 should set out a requirement for 'visioning' documents to include, as part of their understanding of a particular location, an articulation of what it is that makes that place distinctive or sensitive. This should include details of how proposals will relate to individual heritage assets and historic character, and as above would help proposals satisfy the requirements of London Plan policy HC1.	Noted. A paragraph has been added to Section D.1.1, recommending the inclusion in "visioning" documents of a section articulating the elements of distinctiveness and sensitivity of the place their proposals are related to.
General and specific consultation bodies		Historic England	<i>Making better use of land and buildings</i>	B	Paragraph b.47 as set out contains no reference to either designated or non-designated archaeology in the borough.	Noted. A reference to archaeology has been added on Paragraph b.47.
General and specific consultation bodies		Historic England	<i>Making better use of land and buildings</i>	C	Sections C.1 and C.2.1: We note the potential areas identified for intensification across the borough. From the maps available it is somewhat difficult to be precise about their proximity to individual designated heritage assets, including conservation areas and registered parks and gardens. However, it would appear that at least some are in relative proximity if not perhaps adjacent. It will therefore be important that appropriate consideration of potential impacts is built into the process – reference to conservation area appraisals and their analysis of significance and sensitivity would be helpful here. We would also point out that there is a high potential correlation between areas designated as brownfield and archaeological potential. This should be reflected in Principle C.2.1.	Noted. A reference to conservation area appraisals has been included on sections C.1. The potential correlation between areas designated as brownfield and archaeological potential is acknowledged in Principle C.2.1.
General and specific consultation bodies		Historic England	<i>Creating well designed, well connected, inclusive places</i>	D	Section D.1.5: As with section B.5 above, it would be helpful to signpost Historic England research on increasing density in sensitive historic locations.	Noted. A reference to Historic England's research on increasing density in sensitive locations has been added to Section D.1.5.
General and specific consultation bodies		Historic England	<i>Making better use of land and buildings</i>	A	Section A.3: We note the reference to Supplementary Planning Documents on page 9. We would suggest that an explicit reference to the Thamesmead & Abbey Wood Opportunity Area Planning Framework should be included here given its position in the overall planning policy context for the area.	Noted. A reference to the Thamesmead and Abbey Wood Opportunity Area Framework has been added to Section A.3.
General and specific consultation bodies		Historic England	<i>Making better use of land and buildings</i>	B	Section B.1: We strongly welcome the requirement at b.5 that development should strengthen and integrate well with the existing character of development. In order to reflect the sensitivity of parts of the borough in heritage terms, we recommend that an explicit reference to the historic environment should also be included here. Section B.5: We note the text at b.30 that indicates that certain areas may be better suited to greater density than others. Again, we would suggest that a reference to the historic environment in this section would be helpful in making clear the potential further considerations of developing in sensitive locations. We also consider that including some text to clarify that increasing density across an area does not necessarily mean increased height of buildings. Section B.6: We note the logic underpinning the process that has determined the sensitivity to change across different areas and categories of the borough. While heritage significance is not the only determinant here, we would however suggest that it should be referenced in this section, both to align with NPPF terminology and to underline the relationship between designated heritage assets and wider character.	Noted. An explicit reference to the historic environment and heritage significance has been added to sections B.1- B.5 and B6 respectively. A paragraph has been added to Chapter B.5 clarifying that " increasing density across an area does not necessarily mean increased height of buildings".
General and specific consultation bodies		Historic England	<i>Creating well designed, well connected, inclusive places</i>	F	Section F.10: This section (at paragraph f.81) should take the opportunity to align with London Plan policy HC1 and encourage development proposals to use the significance of the historic/archaeological context of the site to inform and shape proposed design – see also our comments in relation to B.7 and D.1.1.	Noted. Paragraph f.122 has been added to Section F.10, encouraging development proposals to use the significance of the historic/archaeological context of the site to inform and shape proposed design.
General and specific consultation bodies		Historic England	<i>Making better use of land and buildings</i>	B	...at para b.36 the bullet point that includes 'heritage assets and designations' should be replaced by 'designated and undesignated heritage assets' to reflect NPPF terminology.	Noted. Text of paragraph b.36 has been changed accordingly with the point raised.
General and specific consultation bodies		Historic England	<i>Characterisation Study, Tall Buildings Assessment and Heritage Appendix</i>	B	Firstly, we note that the draft SPD draws heavily on the characterisation and tall buildings studies that have now been completed, although neither of these documents are currently subject to consultation. While we note that these studies are to be subject to public consultation 'at a later date', given that both in effect comprise the evidence base for the Design SPD, it would have been helpful if they had also been consulted on at the same time or indeed before. We therefore consider that it is important that the Design SPD should not progress further after this public consultation until the associated studies on which it is largely based have been consulted on in order that all stakeholders can properly consider their inter-relationships.	The Characterisation Study and Tall Buildings assessment (CSTBA) are evidence-base documents. As such, they are not mandatorily subject to public consultation. Nevertheless, the CSTBA will be an integral part of the upcoming public consultations in the development of the new Royal Greenwich Local Plan, starting with an issues and options "big themes" consultation in summer 2023. The Urban Design Guide is a Supplementary Planning Document (SPD). SPDs are non-statutory documents, which cannot form new policy. This means that any information in the SPD must be interpreted as guidance only. This said, regarding the information in the SPD extracted from the CSTBA, it is understood that some of it could lead to the misleadingly perception that the SPD would be in contradiction with the current RBG Core Strategy. For this reason, the section regarding tall buildings in Chapter F of the SPD has been revised. The Tall Buildings Recommendation Map at page 178 has been removed and replaced with a set of design principles, more in line with the spirit and intent of the SPD.

General and specific consultation bodies		Historic England	<i>Creating well designed, well connected, inclusive places</i>	D	Section D.1.2: It would be helpful to include potentially sensitive frontages and relevant views in the example diagram.	The diagram in question is just an illustrative example of a spatial concept diagram. It is not comprehensive of all the factors to be carefully considered for each scheme. This said, the diagram has been revised to include sensitive frontages and relevant views.
General and specific consultation bodies		Historic England	<i>Creating well designed, well connected, inclusive places</i>	F	Section F.2: We note the text at f.10 indicating that heights of new development should 'generally' be contextual in areas that are sensitive to change. This implies that there may be opportunities for buildings that are larger or taller in such areas, and appears to run contrary to text elsewhere on this subject. Greater clarity is required here, perhaps in the form of detail as to where and how such non-contextual new buildings would be appropriate. Principle B.7 (Responding to the existing townscape, heritage assets and historic landscapes) should also be included in the list on page 176.	The SPD provides high level guidance on a wide range of issues, including how to design buildings and heights well integrated within their surrounding context. This does not preclude that each proposal submitted for approval should be carefully assessed on its own merits and that heights exceeding those general recommendations could be fully justified in urban design and conservation terms by the applicants. For this reason, it is considered that the text in section F is not contradictory. Principle B.7 will be added to the list on Page 176.
General and specific consultation bodies		Historic England	<i>Creating well designed, well connected, inclusive places</i>	F	Secondly, we note section F.3 relating to Tall and Large Buildings, which is underpinned by the Tall Building Study. While we acknowledge the purpose of an SPD is to further expand and provide guidance on adopted policy, we consider that the consultation draft is at risk of going further than simply offering greater detail on Policy DH2 in the adopted Core Strategy for the borough. As well as introducing a distinction between 'tall' and 'larger' buildings that is not in DH2, we also note that the locations identified as potentially appropriate for tall buildings on page 178 are not the same as that at page 96 of the Core Strategy.	To avoid any misleading perception that the SPD could create new policy in contradiction to the current RBG Core Strategy and in advance of the new Royal Greenwich Local Plan, the section regarding tall buildings in Chapter F of the SPD has been revised. The Tall Buildings Recommendation Map at page 178 has been removed and replaced with a set of design principles, more in line with the spirit and intent of the SPD. The categories of large and tall buildings have been maintained. However, additional clarification has been provided on the fact that "the defined categories of tall buildings in the SPD should not be interpreted as rigid thresholds or prescriptive indication on the suitable height for specific sites, but as a useful principle to facilitate the design of tall buildings well integrated within their context in Royal Greenwich". The revised Design Principle F.3 clearly states that "Development of tall buildings will only be appropriate in locations identified in the Royal Borough Local Plan".
Individual		Ken Hobday	<i>Making better use of land and buildings</i>	B	The UDG should be used to create the mechanism to bring about a native Green Infrastructure of interlocking ecologically enhanced Green Spaces made up of various types of native habitats and green spaces from wildflower Meadows that can support our insects, bumble bees and pollinating insects to Hawthorn based Mixed Species Native Hedges and Shrubberies that support so many of our garden bird species to small and Large areas of Native Woodland planted up especially with our native Oak tree, Quercus robur to support our ever declining and threatened wildlife, such as our increasingly declining Tawny Owls population.	The SPD focuses on providing guidance for new development in the borough. The issues raised in this point will be addressed by the new Royal Greenwich Local Plan. An issues and options "big themes" constation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Agent representing Business/Land owner	Quod	Knight Dragon	<i>Creating well designed, well connected, inclusive places</i>	D	PRINCIPLE D.1.3: DELIVER A CLEAR AND CONNECTED STRUCTURE OF STREETS AND SPACES – "The layout of streets should make use and fully comply with the Manual for Streets 2." The identified text within Principle D.1.3 goes beyond the requirements of development plan policy which is outside the scope of an SPD and should be deleted".	Agreed. The paragraph has been removed as more detailed guidance on streets is provided in Chapter E.
Agent representing Business/Land owner	Quod	Knight Dragon	<i>Creating well designed, well connected, inclusive places</i>	F	PRINCIPLE F.5:- BUILDING LINE - "Buildings should not overhang existing or proposed highways unless in exceptional circumstances". The identified test within Principle F.2 would prevent the introduction of balconies over streets which can be an appropriate design solution for certain sites. The text should be revised as follows: "Buildings (save for balconies where appropriate) should not overhang existing or proposed highways unless in exceptional circumstances".	As a general principle, the Council does not support balconies overhanging the public highway.
Agent representing Business/Land owner	Quod	Knight Dragon	<i>Creating well designed, well connected, inclusive places</i>	F	PRINCIPLE F.8: POSITIVE THRESHOLD SPACES - "Applicants should design appropriate threshold spaces between the private realm of the building and the public realm...Threshold spaces should be a minimum of 1.5m wide". The identified test within Principle F.8 is overly prescriptive and doesn't provide sufficient flexibility for other high quality design approaches, or site specific circumstances where the specified threshold distance may not be appropriate. The text should be revised as follows: "Applicants should design appropriate threshold spaces between the private realm of the building and the public realm...Threshold spaces should be a minimum of 1.5m wide unless this is not appropriate as a result of site-specific circumstances".	By the fact of being guidance only, not prescriptive policy, the SPD recognises that there are exceptions to the defined general design principles. These exceptions should be fully demonstrated on a site-by-site basis.
Agent representing Business/Land owner	Quod	Knight Dragon	<i>Creating well designed, well connected, inclusive places</i>	G	Section G – Residential Amenity and Wellbeing Section G provides detailed guidance on various aspects of residential design quality including play areas, sunlight and daylight and amenity space. The London Plan sets out detailed policies for such residential standards as well as supporting guidance within the GLA's Housing SPG. We therefore question the inclusion of these matters within the draft SPD. Where guidance is already included within GLA policy or guidance it is not necessary for it to be repeated within this SPD and it should be omitted.	It is considered that Section G provides some useful high-level guidance on amenity, which will assist the applicants in applying an holistic approach to the urban design aspects of a development proposal, as recommended in the SPD. As specified in the comment, this guidance is not in contradiction with current local, regional and national policy.

Agent representing Business/Land owner	Quod	Knight Dragon	General comments		National Planning Practice Guidance (NPPG) provides details on the role of Supplementary Planning Documents and notes that SPDs should build upon and provide more detailed advice or guidance on policies in an adopted local plan. The NPPG confirms that as they do not form part of the development plan, SPDs "cannot introduce new planning policies into the development plan" and "should not add unnecessarily to the financial burdens on development". (Paragraph: 008 Reference ID: 61-008-20190315.) It is noted that there are instances within the draft Urban Design SPD where proposed design guidance appears to be more onerous than national, regional and local planning policy. Specific examples are highlighted in the table below. We request that RBG carefully consider these, and ensure that there are no other parts of the SPD which seek design requirements that go beyond the scope of an SPD as set out in the NPPG.	Noted. It is understood that the SPD can only provide guidance which supports the existing policies within Local Plan. To avoid any misleading perception that the SPD could introduce new policy in contradiction with the current Royal Greenwich Local Plan, the SPD has been revised on areas regarding tall buildings, carbon-neutral development and transport. It is now considered that the revised SPD is not in contradiction with the current Royal Greenwich Local Plan. In certain cases and for specific GLA policies, the SPD makes direct reference to the current London Plan, which in some instances is more recent and advanced than current Royal Greenwich Local Plan. The Council is also in the process of developing a new Local Plan. An issues and options "big themes" consultation is planned to take place in early June. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Agent representing Business/Land owner	Quod	Knight Dragon	Creating well designed, well connected, inclusive places	D	PRINCIPLE D.2.1: LAYOUT OF STREET BLOCKS – "Street blocks are the most appropriate way to organise development in Royal Greenwich. New development should generally place buildings along the perimeter of a street block, where they front onto the street and enclose private, semi-private or communal spaces or servicing areas to the rear." The identified test within Principle D2.1 is too prescriptive and doesn't provide sufficient flexibility for other high quality design approaches, nor does it take into account site specific circumstances. The text should be revised as follows: "Street blocks can be an are-the-most appropriate way to organise development in Royal Greenwich. New development should generally place buildings along the perimeter of a street block, where they front onto the street and enclose private, semi-private or communal spaces or servicing areas to the rear."	Principle D.2.1 has been revised as follows: "Generally, street blocks are the most appropriate way to organise development in Royal Greenwich...".
Agent representing Business/Land owner	Quod	Knight Dragon	Creating well designed, well connected, inclusive places	E	PRINCIPLE E.3.1: ATTRACTIVE, LOW SPEED AND SAFE STREETS – "Larger and more connected streets should generally provide wider pavements for walking, segregated cycle facilities." There is no policy basis for a requirement for segregated cycle routes. The reference to segregated cycle routes should therefore be deleted.	Principle E.3.1 is in line with the recently adopted Royal Greenwich Transport Strategy Policy 3a: Reduce harmful emissions from transport in the borough, which articulates the objective of "Supporting and delivering schemes which promote a radical reduction in private car use, such as segregated cycle lanes ...". In regards to Objective 1.1: Improve the accessibility of our streets, Paragraph 4.4 of the Transport Strategy affirms that "Examples of designing for accessibility include the installation of dropped kerbs and tactile paving at all crossings, wheeling-friendly alternatives to stairs, wide and unobstructed pavements and segregated cycle lanes...". Principle E.3.1 does not contradict the current RBG Core Strategy - Policy IM4 Sustainable Travel : "...Cycling and walking are supported within Royal Greenwich. The needs of pedestrians, including those with disabilities, and cyclists should be prioritised in development and the design and layout of development should reflect this... All existing footpaths and cycleways, including the existing riverside and Thames paths, will be safeguarded and the development of new and improved footpaths and cycleways will be supported ". The SPD is also coherent with the London Major's Transport Strategy (2018), which has a strong focus on improving conditions for walking and cycling on London's roads , and with TfL's Healthy Streets for London - Prioritising walking, cycling and public transport to create a healthy city. Point 9, page 57, of the Major's Transport Strategy states that the objective of creating healthy streets includes " Providing protected cycle lanes where required – to make streets safe and appealing for cyclists ". The outlined, general design-principle of segregated cycle facilities on major roads is also coherent with the London Plan Policy TS Cycling: "A- Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:1) supporting the delivery of a London-wide network of cycle routes , with new routes and improved infrastructure.It is reminded that the SPD provides guidance only. It does not create new policy. In these regards, it is understood that there can be exceptions to Design Principle E.3.1, which should be justified on a site-by-site basis.
Agent representing Business/Land owner	Quod	Knight Dragon	Creating well designed, well connected, inclusive places	F	PRINCIPLE F.2: AN APPROPRIATE HEIGHT APPROACH TO THEIR LOCALITY – "Approaches to height may vary slightly (normally by not more than one floor) to express important building corners at nodes or intersections where this could help the distinctiveness and legibility of an area and where this is justified in relation to the specific site context". The identified test within Principle F.2 is overly prescriptive and doesn't provide sufficient flexibility for other high quality design approaches. Furthermore, this approach isn't appropriate within Opportunity Areas where intensification is a policy objective and where tall buildings are supported. The text should be revised as follows: "Approaches to height may vary slightly (normally by not more than one floor) to express important building corners at nodes or intersections where this could help the distinctiveness and legibility of an area and where this is justified in relation to the specific site context".	Principle F.2 has been slightly revised as follows : Approaches to height may vary (normally by not more than one-two floors) to better mark important building corners at nodes or intersections, where this could help the distinctiveness and legibility of an area and where this is justified in relation to the specific site context...
Agent representing Business/Land owner	Quod	Knight Dragon	Creating well designed, well connected, inclusive places	F	PRINCIPLE F.2: AN APPROPRIATE HEIGHT APPROACH TO THEIR LOCALITY – "Building height should not prevent air flow and natural light to the street level." All buildings by their very nature will prevent natural light to street level to some degree and as such the identified text is not feasible. This text should be deleted.	Principle F2 has been revised as follows (in bold): "Building height should be designed in a way to ensure air flow and limit loss of natural light to the street level as far as possible ".

Agent representing Business/Land owner	Quod	Knight Dragon	<i>Creating well designed, well connected, inclusive places</i>	G	PRINCIPLE G.2.2: PROVIDE HOMES WITH SUFFICIENT DAYLIGHT AND SUNLIGHT – “Single aspect northfacing apartments are not appropriate as they receive insufficient sunlight.” As currently drafted, the identified text within Principle G.2.2 goes beyond the requirements of development plan policy which recognises (Policy D6) that single aspect units can be an appropriate design solution to meet the requirements of Part B in Policy D3 (optimising site capacity). This section of Principle G.2.2 must therefore be deleted to ensure consistency with national guidance which states that SPDs cannot introduce new policy requirements.	Principle G.2.2 has been revised as follows: “Development should maximise on dual aspect units. Single aspect north facing apartments can receive insufficient sunlight and should be normally avoided, in line with London Plan Policy D6”.
Agent representing Business/Land owner	Quod	Knight Dragon	<i>Creating more sustainable, biodiverse places</i>	F	PRINCIPLE F.1: BUILDINGS TO MINIMISE THEIR ENVIRONMENTAL IMPACT – “All developments must be designed to net zero” Whilst KDDL support strategies to reduce carbon emissions, the identified text within Principle B.12 (F.1 ed.) goes beyond the requirements of development plan policy which is outside the scope of an SPD and should be deleted.	Principles F1 and B12 have been revised in line with the London Plan Policy Sl.2 and following paragraphs.
Agent representing Business/Land owner	Quod	Knight Dragon	<i>Making better use of land and buildings</i>	B	Figure b.3 identifies that parts of the Peninsula are PTAL 1/2. In the context of proposed principle B.5 higher density developments would not be supported in these parts of the peninsula. The Peninsula is identified in the London Plan as an Opportunity Area where the delivery of higher density developments is supported. The identified text within Policy B.5 should therefore be revised to include reference to future PTAL, not just existing.	The map in Figure b.3 refers to the existing PTAL levels in the Royal Borough. A map showing the future PTAL level only for some specific locations is not desirable. To address the point raised, the text of Design Principle B.5 has been revised as follows: “ Besides in established town and district centres or identified Opportunity Areas and Strategic Development Areas in the London Plan 2021 and RBG Local Plan , higher density developments (above 150 units/ha) should generally be concentrated in areas of PTAL 3 or higher or that are less than 800m from a rail, DLR or underground station, and also located less than 10 minutes (maximum 15 minutes) from a local centre, primary school and major open space.
Agent representing Business/Land owner	Quod	Knight Dragon	<i>Making better use of land and buildings</i>	C	Figure c.31 identifies industrial areas across the Peninsula. These should be reviewed for accuracy.	The maps in the SPD extracted from the Characterisation Study and Tall Buildings Assessment (CSTBA) are based on existing conditions and a high-level assessment of the whole borough. Further detail on development sites will be provided by the new Royal Greenwich Local Plan.
Agent representing Business/Land owner	Quod	Knight Dragon	<i>Making better use of land and buildings</i>	B	Figure b.4 identifies walking times from town, district and local centres and parts of the Peninsula are identified as being 15 mins from these facilities. This doesn't take into account the planned development approved under the Outline Planning Permissions at the Peninsula and as such, the identified text within principle B.4 should be revised to include reference to planned facilities, not just existing.	The maps in the SPD extracted from the Characterisation Study and Tall Buildings Assessment (CSTBA) are based on existing conditions and a high-level assessment of the whole borough. Further detail on development sites will be provided by the new Royal Greenwich Local Plan.
Agent representing Business/Land owner	Quod	Knight Dragon	<i>Making better use of land and buildings</i>	B	Figure b.39 identifies parts of the Peninsula as Highly Sensitive / Sensitive to change and other areas not given specific allocations. The supporting text notes that “in areas with greater sensitivity to change even a small change may be harmful to the coherence and/or quality of a character area.” The approach to why these ‘sensitive’ areas have been selected / not selected is unclear and should be reconsidered. Comprehensive transformation of the Peninsula is a policy requirement and as currently drafted, this part of the guidance is in conflict with this strategic objective. Figure b.7 should be revised to identify the whole of the Peninsular as Low Sensitivity to change.	The parts of the Peninsula indicated with a greater sensitivity to change are those which have already been regenerated, with a well-established character. The parts that haven't been redeveloped yet, have been indicated as having a low sensitivity to change. The information in the SPD extracted from the Characterisation Study and Tall Building Assessment (CSTBA) is mainly to explain the preferred methodological approach to urban design in Royal Greenwich, which should always start from a comprehensive analysis and understanding of a site's context and be underpinned by a solid, evidence-based urban-design strategy. In these terms, the maps extracted from the CSTBA are based on a high-level assessment of the whole borough and focus on wide areas more than individual sites. Further detail on development sites will be provided by the new Royal Greenwich Local Plan, which will include site allocations. An issues and options “big themes” consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Agent representing Business/Land owner	Quod	Knight Dragon	<i>Creating well designed, well connected, inclusive places</i>	G	PRINCIPLE G.2.2: PROVIDE HOMES WITH SUFFICIENT DAYLIGHT AND SUNLIGHT – “All dwellings and spaces should benefit from daylight and sunlight levels that conform to BRE (Building Research Establishment) standards. However overheating risk and solar gain should be mitigated by following passive design principles such as glazing ratio, orientation and shading strategy.” As currently drafted, the identified text within Principle G.2.2 goes beyond the requirements of development plan policy which recognises that BRE standards are guidance only, and therefore conformity with BRE guidance cannot be a requirement. This section of Principle G.2.2 must therefore be deleted to ensure consistency with national guidance which states that SPDs cannot introduce new policy requirements.	The SPD provides guidance only, based on design principles. It strongly encourages a best-practice approach to development in RBG. Any exception to the general principles outlined in the SPD, should be fully justified on a site-by-site basis.
Agent representing Business/Land owner	Quod	Knight Dragon	<i>Creating more sustainable, biodiverse places</i>	B	PRINCIPLE B.12: REDUCING CARBON-IMPACT – “Existing buildings must be retrofitted to reduce their carbon emissions to net zero equivalent”. Whilst KDDL support strategies to reduce carbon emissions, the identified text within Principle B.12 goes beyond the requirements of development plan policy which is outside the scope of an SPD and should be deleted.	The SPD provides guidance only, encouraging a best practice approach. It can't form new, prescriptive policy. To avoid any misleading perception on this point, the text of Principle B.12 has been revised as follows: “ The Council strongly encourage the retrofitting of existing buildings to reduce their carbon emissions, with an aspiration to net zero equivalent ”.

Agent representing Business/Land owner	Quod	Knight Dragon	<i>Making better use of land and buildings</i>	C	<p>Page 57/58 "Intensification should be approached in a contextual and sensitive manner to ensure that the Borough evolves sustainably. This chapter covers the area types that are best able to support intensification and change based on their character, public transport accessibility, density and other strategic considerations (such opportunity and regeneration objectives). These are:</p> <ul style="list-style-type: none"> + Brown field sites + Town, District and Local Centres + Corridors + Housing Estates + Other Residential Areas + Institutional areas + Industrial and employment areas, and + Bigbox retail areas". <p>The identified list of areas for intensification should include Opportunity Areas as per the London Plan allocations.</p>	<p>This classification is to facilitate an understanding of the opportunities for intensification presented by different area-types in strictly urban design terms, not policy terms.</p> <p>It is considered that the list of area-types is comprehensive enough for the general, flexible design principle defined in Chapter C.</p>
Agent representing Business/Land owner	Quod	Knight Dragon	<i>Making better use of land and buildings</i>	B	<p>Figure b.15 identifies the west of the Peninsula as 'natural surface' which is misleading in the context of Principle 8.10 which seeks retention and integration of such areas into development design. The west of the Peninsula is brownfield land which has permission for wholesale redevelopment and as such, figure b.15 should be revised to reflect this.</p>	<p>This issue was due to an error in the preparation of Figure b.15: Existing green infrastructure map, which has now been revised.</p>
Agent representing Business/Land owner	Quod	Knight Dragon	<i>Creating well designed, well connected, inclusive places</i>	E	<p>PRINCIPLE E.2: A POSITIVE SENSE OF ENCLOSURE – "As general principles, a height to width ratio of 1.1 and above will have a strong to very strong sense of enclosure and may feel constricted, whilst a ratio of 0.5 or below will have a weak sense of enclosure or feel very open. Street enclosures should generally be in between these extremes."</p> <p>The identified test within Principle E.2 is too prescriptive and doesn't provide sufficient flexibility for other high quality design approaches, nor does it take into account site specific circumstances. Furthermore, this approach isn't appropriate within Opportunity Areas where intensification is a policy objective and where tall buildings are supported. The text should be revised as follows: "As general principles, a height to width ratio of 1.1 and above will have a strong to very strong sense of enclosure and may feel constricted, whilst a ratio of 0.5 or below will have a weak sense of enclosure or feel very open. Appropriate street enclosures will be considered on a site-by-site basis should generally be in between these extremes."</p>	<p>We do not agree with this point, as this is a general principle. It is understood that there are exceptions to it, which should be demonstrated on a site-by-site basis.</p>
Agent representing Business/Land owner	Quod	Knight Dragon	<i>Making better use of land and buildings</i>	C	<p>The identified test within Principle C1.2 is too prescriptive and doesn't provide sufficient flexibility for other high quality design approaches, nor does it take into account site specific circumstances. The text should be revised as follows: "Block consolidation is one of should be the preferred approaches to intensification and enhancement in built up areas where substantial change is proposed".</p>	<p>We do not agree with this proposed change as C1.2 is a general principle. It is understood that there are exceptions to it, that should be comprehensively demonstrated at the pre-application stage of development. Regarding the demolition of existing fabric the last paragraph of Principle C.1.2 specifies that "Block consolidation, where possible, should avoid the demolition of existing buildings, <u>unless they are inefficient, not suitable for meaningful conversion, poorly sited and stand in the way to delivering a coherent and connected place. Development will need to demonstrate that alternatives have been explored and justify why the demolition is necessary</u>".</p>
Individual		Linda Waite	<i>General comments</i>		<p>It is appreciated that this guide relates to new development across the borough. It is also appreciated that much of Charlton south of the Woolwich Road consists of pre-1919 terraces and scope for new development is limited. However it is very disappointing that Charlton is airbrushed out of this document: even Charlton Riverside is not mentioned until page 102. Maps do not feature Charlton as a name, although equally other areas of the borough are similarly omitted.</p> <p>Some of the principles outlined in this draft SDD could well be applied to Charlton right now. Issues such as incentivizing walking (p128), recognizing that "streets are important as public and social spaces and have a bearing on the quality and experience of the urban environment" (p142) and that "street design should first consider the pedestrian" (p148) apply just as much to the older housing areas of the borough (Charlton included) as to new developments. We deserve decent local shops, (not tacky semi-residential parades with peeling paint on shop fronts, dirty windows and rubbish outside) and the freedom to walk along the pavement without having to slalom round bins (p 153, image e.7), abandoned dockless bikes, dog waste and rubbish.</p>	<p>Noted. Charlton is now indicated on the revised map at page 102.</p> <p>The SPD touches on and provide high-level design guidance on a wide range of topics. The outlined design principles in the document can be applied to all areas in the borough, including Charlton.</p> <p>However, a supplementary planning document on its own cannot address all the mentioned issues.</p> <p>In this perspective, as a high level guidance document, the SPD will sit in an intermediate position between RBG Local Plan and other future, more specialised supporting documents, some of which could regard specific areas, such as design codes.</p>

Anonymous received via Commonplace		N/A	Creating more sustainable, biodiverse places	B	<p>B.11 Biodiversity, and E.4.3. Designing For Biodiversity, focus on vegetated habitats. Both biodiversity net gain (BNG), and urban greening calculation, also do the same. Reality of urban environment is many now-endangered species using buildings. Latest government consultation response on BNG confirms that "species features" e.g. swift bricks, must be specified separately by local authorities as they won't be included in the BNG calculation. Swift bricks are most important as they are permanent, maintenance-free and thermally regulated universal nest bricks for a range of small bird species. Also aesthetically integrated, and recommended by NPPG Natural Environment paragraph 023 and London Plan G6 B4.</p> <p>Therefore please be clear that new developments including extensions should specify swift bricks in accordance with best-practice guidelines (e.g. RIBA Designing for Biodiversity 2013, CIEEM, and/ or BS 42021:2022).</p> <p>Also bat boxes and hedgehog highways as per NPPG Natural Environment paragraph 023.</p>	<p>A reference to the BS 42021:2022 guidance has been added as a reference for further guidance within the SPD for swift boxes. There is also reference to birds, bats and bees bricks at F.10.4 paragraph f.160 of the Urban Design SPD.</p> <p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. This is the role of the Local Plan. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period including how we could incorporate Biodiversity Net Gain which goes above the mandatory 10%.</p> <p>The Council is also in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030. Furthermore, the Climate Resilience SPD will incorporate guidance to achieving Biodiversity Net Gain.</p>
Anonymous received via Commonplace		N/A	Creating more sustainable, biodiverse places		<p>The references to bird boxes are welcome but section E.4.3. Designing for Biodiversity needs to be clear that all new developments should have swift bricks installed in accordance with best practice - swift bricks are permanent and don't require maintenance, don't overheat, are a universal nest brick used by a wide range of small birds, and are the only type of bird box recommended by national planning guidance.</p>	<p>A reference to the BS 42021:2022 guidance has been added as a reference for further guidance within the SPD for swift boxes. There is also reference to birds, bats and bees bricks at F.10.4 paragraph f.160 of the Urban Design SPD.</p> <p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. We are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p> <p>Additionally, the council is in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030</p>
Anonymous received via Commonplace		N/A	Creating more sustainable, biodiverse places		<p>The aspirations expressed in this Urban Design Guide are very general and vague. It would be more effective and meaningful to specify that new development will always be expected to include maximum ecological enhancement features, particularly integrated universal swift nest bricks. These features should be installed in accordance with best practice guidance, in terms of numbers of swift bricks and positioning (1:1, swift bricks to residential units, and one swift brick per six square metres on commercial buildings).</p>	<p>A reference to the BS 42021:2022 guidance has been added as a reference for further guidance within the SPD for swift boxes. There is also reference to birds, bats and bees bricks at F.10.4 paragraph f.160 of the Urban Design SPD.</p> <p>The council is in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030 and could incorporate an element relating to swift boxes.</p> <p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. A big themes consultation for the new Local Plan is planned to take place in early June. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	Creating more sustainable, biodiverse places		<p>Both B.11 Biodiversity and E.4.3. Designing For Biodiversity have welcome policies but focus almost entirely on green habitats. As an urban borough there is a wealth of wildlife using our buildings - such as bats, & red-listed bird species (e.g. swifts, sparrows, house martins). There is the occasional brief mention of bird boxes elsewhere in the document but can you be clear that to save these species we need swift bricks (which are good for a range of small bird species), bat boxes & also hedgehog highways in all suitable new developments.</p>	<p>A reference to the BS 42021:2022 guidance has been added as a reference for further guidance within the SPD for swift boxes. There is also reference to birds, bats and bees bricks at F.10.4 paragraph f.160 of the Urban Design SPD.</p> <p>The Council is in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>

Anonymous received via Commonplace		N/A	Enabling good quality household extensions		<p>1.64 I do not agree that front-facing mansards should be discouraged in conversation areas. This appears to be overly restrictive, given the number of conservation areas in the Borough, and the fact that mansards can be high quality and complementary to existing buildings. A more targeted approach would disallow mansards in areas of global historic importance (e.g. the World Heritage Site at Greenwich Town Centre), but allow high quality development in areas of local importance (e.g. Plumstead Common, Westcombe Park). Where a street already has some mansards, policy should permit the remaining houses to add mansards of their own, provided they are built to good design standards, along the lines of Create Streets's recommendations: https://www.createstreets.com/wp-content/uploads/2021/08/Living-Tradition.pdf. Mansards has also been used to effectively increase density in Camden: http://www.apexairspace.co.uk/wp-content/uploads/2017/03/HTA-P-Rooftop-Development-Report.pdf</p>	Extensions should respect the original architectural features and detailing of the dwelling and should be designed to complement the dwelling in terms of windows, doors, openings, roofs and materials. Each application submitted to the Royal borough will be assessed on a case-by-case basis. However, often roof extensions can change the architectural character of the building and its relationship to the street. Conservation areas are particularly sensitive to change, therefore; in order to protect the historic value of conservation areas front-facing mansard roof extensions are discouraged.
Anonymous received via Commonplace		N/A	Making better use of land and buildings		<p>land should be in Public Ownership and should not be sold off to developers. Developers have little or no interest in the public good, they are interested in making profits for investors and in their next project. If the land is not needed right now, it should still be kept for the future as and when it might be required. Look at the Vienna Model and how the housing policy works well there for good and balanced communities!! Please put a stop to housing on the site of B & Q, and its car park. The Odeon Cinema, the Car Park and B&Q are local amenities and there is SO MUCH housing on the peninsula already! This is a horrid place to build housing, so close to the A102 (noise, dirt, tyre dust and air pollution). There must be a limit to the amount of new housing, the ever-increasing population density and too much in-filling. To ignore this makes for tense neighbourhoods and unhappy people.</p>	<p>Land ownership is not controlled by the Planning Department. Planning can only control the use of the land.</p> <p>Greenwich Peninsula is designated as an Opportunity Area which has the potential to deliver up to 17,000 new homes (as identified in the London Plan 2021). Comments regarding the development of the Millennium Retail Park Car Park should be submitted to the associated planning application.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	Enhancing high streets and shopfronts		These are all good ambitions and should be enacted.	Noted.
Anonymous received via Commonplace		N/A	Enabling good quality household extensions		If people want to build an ugly extension on the (rear) of their property, it should be their right to do so	Noted.
Anonymous received via Commonplace		N/A	Making better use of land and buildings		I think Greenwich is developing the right strategy for building on available land. Looking forward to updated on the Woolwich Tower in front of Tesco's making great use of land for Commercial/residential use in a Central Woolwich Location.	Noted.
Anonymous received via Commonplace		N/A	Enabling good quality household extensions		Qualified agreement only. Great to have design principles but only to get the best results, not to shut down extension building. One of the best ways of increasing the efficiency of our mostly too old housing stock. With rocketing property prices the ability to increase the size of an existing home to accommodate a growing or multi-generational family for a reasonable outlay is vital to many.	Noted.
Anonymous received via Commonplace		N/A	Enhancing high streets and shopfronts		Needs to be done. Please make a start on my local High Street - Trafalgar Road. It's a mess with the latest 'Jolly Good Time' massage parlour failing on every point.	Noted. Planning can only control development where a planning application has been submitted. In many instances planning permission may not be required; however the Urban Design Guide SPD will provide guidance and best practice to encourage high quality shopfront design.
Anonymous received via Commonplace		N/A	Enhancing high streets and shopfronts		Need to make put town centres more attractive areas to visit with new shop fronts, shutters, signage and lighting. Fronts of buildings painted and older buildings refurbished. Possibly with some buildings being used for mix developments with residential homes above shops and commercial space. With out town centres being used more in the evenings and at weekends.	<p>Noted. Planning can only control development where a planning application has been submitted. In many instances planning permission may not be required; however the Urban Design Guide SPD will provide guidance and best practice to encourage high quality shopfront design.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	Enhancing high streets and shopfronts		High Streets can be enhanced with easier safer access for active travel. Once in town accessible secure cycle storage in suitable locations and with sufficient volume is required. This also needs to be suitable for adapted and cargo bikes.	<p>Noted. The issue of active travel is dealt with in the Council's recently adopted Transport Strategy. One key objective of the Transport Strategy is to increase the amount of good quality cycle parking within the borough. To achieve this the Council will work with developers and other stakeholders to ensure new developments provide good levels of on and off-street cycle parking.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	Enabling good quality household extensions		Being able to meet with planners to talk about what the best options are before submitting plans is very helpful. Making planning no longer people you think work against you as a home owner but people who want to work with you.	Noted. The Royal Borough offers pre-application advice, whereby, the council can advise whether planning permission is required or not, and where planning is required we can advise whether it is likely to be granted or what changes can be made. Details for this can be located using this link: https://www.royalgreenwich.gov.uk/info/200193/planning_applications_and_permissions/1076/planning_pre-application_advice

Anonymous received via Commonplace		N/A	Making better use of land and buildings		<p>Not sure of planning officers grasp of the reality. In East Greenwich where I live we have ad hoc development of industrial/distribution centers without traffic management strategies in place. I failed to see any mention of the new Silvertown Tunnel in the draft document in relation to the existing Blackwall Tunnel. Silvertown once operational in a couple of years will give much greater access to large HGV's. Not opposed to industrial use of land but it needs to be managed.</p>	<p>Noted. The SPD can only provide guidance which supports the existing policies within the Royal Greenwich Local Plan, it cannot introduce new policies. New planning applications for industrial uses over a certain size have a travel management plan attached to the application or as part of the conditions for the development to take place. If you believe a development is in breach of their travel management plan then this should be reported to our Planning Enforcement Team to investigate.</p> <p>A reference to the Silvertown Tunnel has been added in paragraph c.32. Regarding the potential increase in traffic, RBG new Transport Strategy adopted in November 2022 includes a range of measures to help encourage walking, cycling and public transport, reduce traffic, improve air quality, and support the rollout of ultra-low emission vehicles. These measures will help to make Royal Greenwich a cleaner, greener, safer and healthier borough.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period, which can address the issue of intensification at individual development sites. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	Enhancing high streets and shopfronts		<p>The shops between Wellington Gardens and Nadine Street in Charlton need to have a facelift and this section of Charlton Church Lane must be the dirtiest because residents living above the shops throw their rubbish outside these shops on the pavement. Monday mornings are a sad sight when having to walk down to the train station. I would plea for some measures taking place to spruce this area up as it is really unacceptable.</p>	<p>Noted. The Urban Design Guide SPD provides guidance and best practice for business owners on redesigning and upgrading their shopfronts but it cannot force them to do so. However, if you believe the condition of land is in a dangerous or harmful state, this can be lodged with our planning enforcement team. See the following webpage: https://www.royalgreenwich.gov.uk/info/200193/planning_applications_and_permissions/47/unauthorised_development</p> <p>Complaints regarding fly tipping can be reported via our website: https://www.royalgreenwich.gov.uk/info/200268/street_cleaning_and_repairs/216/report_fly-tipping</p>
Anonymous received via Commonplace		N/A	Creating more sustainable, biodiverse places		Should go further	<p>Noted. We are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	Creating well designed, well connected, inclusive places		<p>If we are talking about connectedness we need to have a specific commitment to pedestrian footpaths to make all developments permeable, to make access to public transport, leisure opportunities and shops easier by foot. All large developments should have an obligation to add to the pedestrian map of the borough, opening up new routes. In addition, new footpaths can be added to older developments and streets. I was so surprised for instance to see how a large chunk of Blackheath Park has a PTAL of zero. Yet if there was a footpath through to Kidbrooke and its buses and station, that would change. Not only encouraging walking and easing life of residents, but also increasing the number of new developments large and small which can be designed and designated car-free.</p>	<p>One key objective of the Transport Strategy within Royal Greenwich is to increase the proportion of people who choose to walk and cycle for their everyday journeys. This includes improving the accessibility of our streets. To achieve this the Council will develop an Active Travel action plan and working with big employers in Royal Greenwich to increase the development of travel plans.</p> <p>With regards to comments regarding to footpaths to be added to older developments. Whilst the council is committed to improving active travel options, the area in question contains a number of private roads not under the council's control. Support will be offered to developments which contain improvements to footpaths which in line with the guidance within this SPD.</p> <p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period, including comments regarding planning obligations and permeability.</p>
Anonymous received via Commonplace		N/A	Creating well designed, well connected, inclusive places	D	<p>D.3 whilst transport connections, cycling and walking initiatives are all well and good, there are circumstances, such as when it's dark (including late at night), getting shopping, when private car use is the only/best option - limiting parking near homes and across the borough can restrict and isolate residents, even those who are more able, as it is not always feasible to walk, cycle or get public transport, for safety and mobility reasons. Not everyone is geared up to cycling.</p>	<p>Parking restrictions and controlled parking zones fall outside the remit of the planning system and are developed by the highways department within the Council. This comment has been forwarded to our highways team to review within their strategy for the borough.</p> <p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. The London Plan contains policies on parking in new developments (see policy T6).</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period. This includes potential policies on car parking.</p>

Anonymous received via Commonplace		N/A	Creating well designed, well connected, inclusive places	E	<p>In general, we welcome the principles outlined in E.1.1-E.3.9, including the sections on street furniture, lighting, public art, and accessibility. We would though like to see more emphasis here on the principle of fifteen-minute cities, with access to amenities including shops, leisure centres, and libraries. It would be helpful to tie this principle to affordable housing as well, as not only shoppers and amenity users need access: businesses should be able to recruit staff from the local area, with retailers and services staff potentially less well-paid than the population they service.</p> <p>We would also like to see this document tie in SuDS systems with other rainwater harvesting and grey water treatment for developments. Chapter F does not cover systems that separate water from sewage, a big omission given the predicted water shortages resulting from climate change and the pressures on river systems from the discharge of sewage into rivers when drainage systems are overwhelmed by rainfall. This problem also pertains to the increased tendency to build hard-standing for parking and to loss of garden space for extensions and out-buildings, affecting the sustainability elements of the document as well..</p>	<p>Planning can only control the use of the land, and cannot control how a business operates, including its recruitment practices.</p> <p>With regards to comments regarding SuDS, the Council is in the process of producing a Climate Resilience SPD which will provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	Creating well designed, well connected, inclusive places	E	<p>D.3.3. This is sensible, but should more explicitly aim to restrict street clutter.</p> <p>E.3.9. I do not think that artists should need to have a connection to the local area to create art that improves a sense of place and local character.</p> <p>E.6. It would be good to strengthen this principle. Several areas of recent development (e.g. Abbey Wood) have been let down by poor maintenance.</p>	<p>Regarding comments on sections D.3.3, Section D.3.3 relates to creating more permeable development through good urban design, therefore; would not be the best section to address street clutter issues. Section E of the urban design SPD relates to the appearance of the street including street clutter and furniture. There are several references contained within Section E of the Urban Design SPD to avoid and limit street clutter in design. More explicitly in paragraph e.32 states 'Street furniture along streets should be consolidated within a 'street furniture zone' which should be scaled proportionally to the street type and scale.'</p> <p>Additionally, with regards to comments relating to street clutter. The council has developed a Transport Strategy. Objective one of this strategy (page 41) states that the council would like to remove unnecessary street furniture and clutter to ensure paving and crossings are wheelchair accessible. London Plan Policy D8 also states 'development plans and proposal should... ensure that street clutter, including street furniture that is poorly located, unsightly, in poor condition or without a clear function is removed'. The London Plan will be used to assess any application submitted to RBG.</p> <p>With regards to comments relating to E.6, SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. A big themes consultation for the new Local Plan is planned to take place in early June. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p> <p>With regards to comments relating to E.3.9., in line with our Corporate Plan the council would like to encourage more businesses and jobs within the Royal Borough to increase investment and energy into the area. Therefore, the SPD would like to encourage businesses to choose and spend locally within the area. This includes seeking local artists within the area, which would also have an increased connection to the local area.</p>
Anonymous received via Commonplace		N/A	Creating more sustainable, biodiverse places		<p>The principles are worded as recommendations, and thus easily ignored. They would be better put in a more directive way so that it is clear these are obligations on those proposing development rather than recommendations using language like "where possible". That applies also to detailed points such as using native species; removing mature trees (which should be ruled out unless in genuinely exceptional cases); and the biodiversity net gain obligation: large developments in particular should be looking to maximise biodiversity rather than simply meeting the 10% threshold.</p>	<p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	Creating well designed, well connected, inclusive places	E	<p>E.3.7 Utilities. There is no mention of Ground Source Air Conditioning. This was (is?) seen by the Council as one of the best ways of achieving Zero Carbon. It requires, as a minimum, deep holes to be bored for the pipework. It was bruited three years ago, but has since gone quiet.</p>	<p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies.</p> <p>The Council is in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030.</p> <p>The Council has also recently commissioned a Towards Net Zero Carbon Study along with 17 other boroughs which will be used as an evidence base to justify policies within the new developing Local Plan. The study includes the use of air source heat pumps in meeting the net zero standards in the London Plan.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>

Anonymous received via Commonplace		N/A	<i>Creating well designed, well connected, inclusive places</i>		<p>The principles are generally right. There is a need for more specific - quantified - strategies for raising the proportion of affordable housing in the Borough; linking in to transport networks those areas that are currently not well served; and increasing the amount of green space across the Borough, particularly in those areas that currently don't have enough.</p>	<p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies.</p> <p>The current local plan, together with the London Plan has specific policies regarding affordable housing provisions (see Policies H6 and H8 of the London Plan and Policy H3 of the Local Plan, which requires developments of 10 or more homes to provide 35% affordable housing). Furthermore, both the Local Plan (see Policy OS(b)) and London Plan (see Policy G4) also include policies relating to increasing green provision in areas which are deficient.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	<i>Creating more sustainable, biodiverse places</i>		<p>Additionally to my earlier comment, all new build or significant redevelopments should have solar power and, where suitable, air heat pumps; all developments of a sufficient size should have green roofs in combination with solar PV; it should be clear (perhaps it's elsewhere in planning regulations, but it's not in this guidance) that no new development should use gas for heating or cooking; there should be no use of artificial grass. It would be good to have a plan for the extension of green space in the borough, particularly in those parts where it is lacking at the moment; so that there is a clear process rather than just an aspiration.</p>	<p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. The SPD does include state that bee bricks, bat and bird boxes and hedgehog boards are encouraged in new development, however; the SPD cannot create a policy to ensure this is included in all new developments. This is the role of the Local Plan, which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p> <p>The council is in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030.</p> <p>The council has also recently commissioned a Towards Net Zero Carbon Study along with 17 other boroughs which will be used as an evidence base to develop policies within the new Local Plan. The study includes the use of air source heat pumps in meeting the net zero standards in the London Plan.</p>
Anonymous received via Commonplace		N/A	<i>Creating well designed, well connected, inclusive places</i>	E	<p>Please make lots of green spaces and areas for children to play. Far too many now being built in Greenwich in particular Rochester Way and Kidbrooke. There were less houses and flats when it was the old Ferrier estate. Also new flats are being too high and blocking out light and far too near the main road where school children have to walk.</p>	<p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. We are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	<i>Creating more sustainable, biodiverse places</i>		<p>Solar panels should be mandatory on all new buildings. Recycling of grey water should also be mandatory.</p>	<p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. We are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	<i>Enhancing high streets and shopfronts</i>		<p>While it is laudable that the council provide guidance to any business or individual seeking to redevelop or redesign their property there appears to be no regulatory requirement to ensure shopping parades are not destroyed by a change of use from retail to residential.</p> <p>On the 3rd August 2022, RBG made an Article 4 Direction - A non-immediate Article 4 Direction to withdraw the permitted development right to change from a use falling within Class E (commercial, business and services uses) of the Town and Country Planning (Use Classes) Order 1987 (as amended) to a use falling within Class C3 (dwellinghouse) of that order.</p> <p>Has this been implemented since the closing date of 22nd September 2022?</p> <p>Another issue is the size of the SPD, it is very hard to read through online, as there is so much to take in. I understand there are paper copies in the libraries, but this doesn't allow for the time needed to read such a large document.</p>	<p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. We are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p> <p>Regarding the Article 4 direction to protect retail premises from a change to residential use, a Cabinet Member decision on whether to confirm the Article 4 Direction to remove this permitted development right is imminent. As a 'non-immediate' Article 4 Direction, if it is confirmed, it will be in August 2023, 12 months after the Direction was made. This is to comply with national planning legislation. From this date, planning permission would be required to change from a Class E use to residential in the areas covered by the Direction.</p> <p>Comments on the size of the document are noted, and the council will review this feedback for future planning documents which are produced. A decision was made to merge several pieces of guidance into one large document to form the Urban Design SPD, however; in the future we will consider how such documents can be made more accessible, particularly in digital formats.</p>

Anonymous received via Commonplace		N/A	<i>Creating well designed, well connected, inclusive places</i>	E	<p>I agree with the principles stated but not sure of RBG's ability or desire to deliver, for example on safe low speed streets without a blanket 20mph speed limit and kerbside/streetscape policies on parking, suDs and greening.</p>	<p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. Therefore, they cannot create new policies.</p> <p>The Council's Transport Strategy (Policy 2a, page 55) states that Royal Greenwich will be considering the introduction of a borough-wide 20mph speed limit which will help in creating safer streets within the borough.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period, including potential policies on transport and introduction of kerbside and streetscape, and policies on parking, SuDS and greening.</p>
Anonymous received via Commonplace		N/A	<i>Enabling good quality household extensions</i>		<p>Firstly I commend the depth of research and the granularity of recommendations, as well as the general drive toward sensitive intensification which I support. I think some points need fine tuning:</p> <p>i.2.2 / i.3.1 - Rear dormer massing should be reconsidered. Vast majority of homes benefit from PDR and can have full width, hip to gable, end of terrace and l-shape dormers. Nearly all PDR rear dormers are at the full extent of these PDR limits; while for any homes that don't benefit from PDR (such as flat conversions) a much harsher regime is applied. It makes sense that for these properties, a full width dormer with high quality design and appropriate set backs should be accepted as it is in Lewisham, Bexley etc. It should only be in conservation areas where the harsher current guidance is applied. The policy as is restricts top floor flats (many in prima facie pre-1919 terraces) from expanding or splitting to add to the housing supply.</p> <p>In Section I could the South Tottenham floor extension scheme also be considered as a means of sensitive intensification - i.e. adding a floor in identical style to the existing design code. This could be especially useful in/around the intensification corridors highlighted, for example in Plumstead.</p> <p>I would also welcome generally a commitment to consider creative design solutions to support intensification that may meet the spirit but not the letter of these guidelines.</p>	<p>Support noted. The SPD promotes best practice on dormers. This said, it is understood that Permitted Development Rights cover a significant number of properties in the Royal Borough.</p> <p>Furthermore, Policy DH(a)iii of the local plan (2014) states that all new roof extensions should be designed to respect the scale and character of the host building, the street scene and the surrounding area and respect the amenities of adjacent occupiers. The SPD is providing further guidance to support this policy.</p> <p>It is reminded that the SPD provides high level guidance on a wide range of subjects. Future, more specialised supplementary planning documents on specific area types or places, including design codes, can investigate the raised issue more in detail, as it happened in Haringay for the South Tottenham Design Code.</p>
Anonymous received via Commonplace		N/A	<i>Making better use of land and buildings</i>	C	<p>Re C.2.2.: Corridors: the document fails to take account of the Silvertown Tunnel, currently under construction, with the pressures that will place on a variety of the roads through the borough, notably those leading west towards the Rotherhithe Tunnel (for those avoiding tolls) or south including Kidbrooke. TfL have said that they plan changes to various junctions including the Kidbrooke junction, which may make those corridors more attractive to drivers. In addition, the intensification of road use relating to the Silvertown Tunnel has already led to developments of 'last-mile' distribution centres on industrial estates on the Peninsula, and this document should be more specific about the effects on similar developments. Is the borough seeking further intensification, when current proposals also include large-scale housing development, for instance at the Ikea site?</p>	<p>The corridor section of the Urban Design SPD highlights areas of the road which could benefit from intensification to allow for investment to improve the quality of the area, which often have a low value and have been affected by disinvestment, lack of repair and neglect. Improvement and investment into these corridors could result in improved walking and cycling routes, together with new tree planting to create quality boulevards.</p> <p>A reference to the Silvertown Tunnel has been added in paragraph c.32. Regarding the potential increase in traffic, RBG new Transport Strategy adopted in November 2022 includes a range of measures to help encourage walking, cycling and public transport, reduce traffic, improve air quality, and support the rollout of ultra-low emission vehicles. These measures will help to make Royal Greenwich a cleaner, greener, safer and healthier borough.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period, which can address the issue of intensification at individual development sites. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	<i>Making better use of land and buildings</i>	C	<p>Re C.2.2.: Corridors: the document fails to take account of the Silvertown Tunnel, currently under construction, with the pressures that will place on a variety of the roads through the borough, notably those leading west towards the Rotherhithe Tunnel (for those avoiding tolls) or south including Kidbrooke. TfL have said that they plan changes to various junctions including the Kidbrooke junction, which may make those corridors more attractive to drivers. In addition, the intensification of road use relating to the Silvertown Tunnel has already led to developments of 'last-mile' distribution centres on industrial estates on the Peninsula, and this document should be more specific about the effects on similar developments. Is the borough seeking further intensification, when current proposals also include large-scale housing development, for instance at the Ikea site?</p>	<p>The corridor section of the Urban Design SPD highlights areas of the road which could benefit from intensification to allow for investment to improve the quality of the area, which often have a low value and have been affected by disinvestment, lack of repair and neglect. Improvement and investment into these corridors could result in improved walking and cycling routes, together with new tree planting to create quality boulevards.</p> <p>A reference to the Silvertown Tunnel has been added in paragraph c.32. Regarding the potential increase in traffic, RBG new Transport Strategy adopted in November 2022 includes a range of measures to help encourage walking, cycling and public transport, reduce traffic, improve air quality, and support the rollout of ultra-low emission vehicles. These measures will help to make Royal Greenwich a cleaner, greener, safer and healthier borough.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period, which can address the issue of intensification at individual development sites. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>

Anonymous received via Commonplace		N/A	Enhancing high streets and shopfronts		Insist shops retain the original design for the store front. This ensures more sympathetic high street appearance and stops cheap, poor quality design.	<p>The council cannot insist original shopfront designs are preserved, unless these are protected through heritage designations. The Urban Design SPD provides guidance on the design of shop front in different styles. Where the site is located within a conservation area, or forms part of a listed building then the guidance states that the front shops should be retained and repaired where feasible. SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	Creating well designed, well connected, inclusive places	E	It is very important that new developments are integrated with amenities shops and public transport with some bus services extended to or rerouted to serve new developments. As the council wants to reduce car usage and encourage walking and cycling more. Open spaces, walkways and shopping areas need to be well lit and safe for residents and visitors...	<p>The Council has recently published a Transport Strategy which sets the Royal Borough's vision for a clean, green, and safe place to live, work and visit. Policy 2c of the strategy states that RBG will be 'identifying areas within the borough that have safety and security concerns and consider the need for intervention'. This includes the installation of better street lighting and well design public spaces with CCTV coverage. Policy 4b also states RBG will be 'improving street lighting across the borough to incentivise active travel after sunset'. Furthermore, Policy 4a of the strategy states RBG will 'Prioritising areas with low existing public transport and essential service accessibility for future public transport, walking and cycling schemes and service enhancements', this includes ensuring new developments are accessible via public transport.</p> <p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. A big themes constitation for the new Local Plan is planned to take place in early June. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	Creating more sustainable, biodiverse places		You need to consult with Greenwich Parks Forum and other local communities before the planning stage to find out what will be acceptable to residents and what they want or do not want. eg. It is no good to say that new developments should contribute to net gains in biodiversity and ecology and then cut down trees, let big payers like IKEA destroy a well-established wild life pond, etc, in street lights and sports grounds remove the prize-winning Sainsburys that was on the site (harnessing rainwater and wind power). Allow light pollution in street lights and in sports grounds that destroys the life-chances of our rare bats.	<p>The Council is developing a developers early engagement guidance together with a new statement of community involvement which will encourage developers to conduct early engagement with the local community and amenity groups for developments over a certain size. We are aiming to consult on the new statement of community engagement and developers guidance note in early Autumn.</p> <p>The Council is also in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	Creating more sustainable, biodiverse places		[abbey wood More flower meadows instead of cultivated grass please more trees for shade and soil protection	<p>The council is in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030 and could incorporate an element relating to swift boxes.</p> <p>SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. A big themes constitation for the new Local Plan is planned to take place in early June. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period. This includes how we could incorporate increased biodiversity within the borough.</p>
Anonymous received via Commonplace		N/A	Creating more sustainable, biodiverse places		Please help homeowners renovate their homes to encourage biodiversity and sustainability with advisory services, grants and modelling ideas. Example I want to remove our paved drive but would love advice and ideally some funds to help make it happen, but I wouldn't have a clue where to go get help in RBG.	<p>The Council is in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030.</p> <p>Unfortunately, the Council does not currently offer any grants to help homeowners renovate their homes to encourage biodiversity. In terms of planning advice, the council does offer a pre-application service (this service is chargeable) which provides advice prior to a planning application being formally submitted.</p>
Anonymous received via Commonplace		N/A	Enhancing high streets and shopfronts		This is a fantastic initiative to make Greenwich high streets more attractive. I'd like to have seen more greenery though - flower beds and hanging baskets, town lawns, new trees and shrubs planted. These could all enhance high streets in Greenwich, which feel paved over and full of concrete. No amount of nicely designed shop fronts will address lack of well-being enhancing greenery in our town centres.	<p>The Council is in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030 and will incorporate aspects of urban greening.</p> <p>Furthermore, the Urban Design SPD does include guidance to encourage movable outside planting to improve the shopfront (see principle H.4.9). SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. Therefore, they cannot create new policies. A big themes constitation for the new Local Plan is planned to take place in early June. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period including the incorporation of urban greening in new developments.</p>

Anonymous received via Commonplace		N/A	<i>Creating more sustainable, biodiverse places</i>		Any guidelines, however good, will only have the desired impact if there is an effective process to implement and enforce them. We hope that the Council will ensure a robust process. Thcion with local residents that goes beyond the proforma and feeds back in a practical way into project design (a.27 – a.30). We would also welcome confirmation that the Council will be firm in rejecting development proposals that are not up to high environmental and other standards, and in insisting on the removal of anything built without proper permission.	The Council is in the process of producing a new Statement of Community Involvement and introducing a Developers Consultation Guidance, which both encourage early engagement with the public on planning applications and planning policy documents. Furthermore, where developments have not been built with planning permission, our Planning Enforcement Team will investigate potential planning breaches and take action. The council will also assess planning applications against existing policies. Where a proposal does not meet our policies it will be refused.
Anonymous received via Commonplace		N/A	<i>Making better use of land and buildings</i>	C	Principle C.2: Intensification needs consideration of the effects of population growth, not only on retail but also on schools, medical centres, and so on. We would like to see some attention paid to this.	The Council monitors the amount and type of infrastructure required to support the level of growth needed within the Local Plan which is used to develop policies. This is then recorded into an Infrastructure Delivery Plan. This plan which was produced in 2021 is available to view online here: https://www.royalgreenwich.gov.uk/downloads/file/3200/infrastructure_delivery_plan_for_royal_greenwich Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Anonymous received via Commonplace		N/A	<i>Making better use of land and buildings</i>	C	Principle C.2: Intensification needs consideration of the effects of population growth, not only on retail but also on schools, medical centres, and so on. We would like to see some attention paid to this.	The Council monitors the amount and type of infrastructure required to support the level of growth needed within the Local Plan which is used to develop policies. This is then recorded into an Infrastructure Delivery Plan. This plan which was produced in 2021 is available to view online here: https://www.royalgreenwich.gov.uk/downloads/file/3200/infrastructure_delivery_plan_for_royal_greenwich Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Anonymous received via Commonplace		N/A	<i>Making better use of land and buildings</i>		The industrial sire adjacent to Mottingham station should be developed for housing.	The council will be launching a "call for sites" exercise as part of developing a new Royal Greenwich Local Plan. Any new sites available for housing or other strategic uses should be nominated as part of this process. Furthermore, an issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Anonymous received via Commonplace		N/A	<i>Creating well designed, well connected, inclusive places</i>	D	Much more emphasis needed on creating efficient and safe cycling routes	The Council's recently adopted Transport Strategy contains information on creating new cycle routes. One key objective of the Transport Strategy is to increase the proportion of people who choose to walk and cycle for their everyday journeys. This includes providing safe and accessible transport networks. To achieve this the Council will develop an Active Travel action plan and Delivering high quality cycling infrastructure by prioritising locations with greatest potential across the borough. Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Anonymous received via Commonplace		N/A	<i>Creating well designed, well connected, inclusive places</i>	C	I found nothing about including hire bike stands to avoid issues with abandoned hire bikes. C2 Intensification seems to be based around motor vehicle routes rather than active travel routes. C2.2 An Urban Boulevard sounds good but the photo shows a fairly disappointing attempt at this. C2.3 Town, District and Local Centres all need accessible, secure cycle parking in suitable locations with sufficient capacity and ability to expand as requirements grow. C2.8 Industrial areas also need safe active travel access especially for commuter cycling. D3.6 In an environment where hundreds of bikes are stolen every day and the police are not interested in following up it is completely unsuitable that you would expect someone who wants to put a small bike store in the front of their house to secure their bike to have to apply for planning permission. This needs to be a very simple approval at no cost. E3.1 Every Public Realm/Street Design needs to be a healthy street to support active travel. Every extra development, increasing our population, needs to ensure the access to local travel hubs and town centres is available through safe active travel routes especially walking and cycling. During major developments RBG need to monitor and ensure the HGV routes agreed are actually used. RBG need to create requirements for numbers of safer low step direct vision HGV's to be used during the build. Start at 10% and increase by 5% each year. Set limits for numbers of HGV's visiting each development site and encourage on site reuse of materials.	The Council's recently adopted Transport Strategy sets out the Royal Borough's transport objectives, which is to provide a clean, green and safe place to live work. The Transport Strategy states that the Royal Borough will develop suitable locations boroughwide which can act as dockless parking bays for shared micro-mobility modes such as dockless bikes and e-bikes futhermore, text will be included in the SPD to provide guidance for hire bikes [include where]. Regarding comments about active travel within industrial areas, Principle C.2.8 (page 105) in the guidance does state 'Design junctions that are safe and easy to cross for pedestrians and cyclists' and 'Deliver legible cycle and pedestrian routes to public transport links such as railway stations'. Regarding comments about planning permission being required for bike stores, the council cannot control national planning legislation which stipulates that such structures require permission. With regards to comments about the image C.5. this is just example of an existing boulevard within Royal Greenwich. Furthermore, Priciple E3.1 will include refence to healthy active travel. Regarding comments relating to producing new requirements for HGVs, this is outside the scope of the Urban Design SPD and the planning system in general. The SPD can only provide guidance which supports the existing policies within Local Plan, it cannot introduce new policies. We are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.

Anonymous received via Commonplace		N/A	<i>Creating well designed, well connected, inclusive places</i>	C	<p>Every new development must include safe, direct convenient cycle routes to local hubs and centres which need to be installed before the first resident moves in.</p>	<p>The existing London plan includes policies which encourage the delivery of cycle routes (these include Policies D3, T5 and T9). Furthermore, the existing Local Plan does include policies to protect, enhance and develop new cycle ways in Greenwich (See Policies IM(b) and IM4).</p> <p>The SPD can only provide guidance which supports the existing policies within Local Plan, it cannot introduce new policies. Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	<i>Enabling good quality household extensions</i>		<p>Greenwich should be more liberal in accepting mansard additions to V shaped London roofs. The proposed policy of "only when in the local area" will inevitably be interpreted by planners in the narrowest of fashions, meaning only if present on that very street.</p> <p>For example in Woolwich mansards are a common feature on whole streets of terraces but if they are not present on an adjacent street current policy would not permit one.</p> <p>Other London boroughs, notably Lambeth and Hackney, will allow one house to be the first to have a mansard. In my experience when one goes everyone on the street wants one and within 5 years or so the street is 50% mansarded.</p> <p>Not only do they add visual interest to relatively mundane 2 story terraces but they improve the living conditions immensely. Victorian terraces were not designed for indoor plumbing and, as stands, most have to choose between either 1. 3 bedrooms upstairs with bathroom downstairs. or 2. 2 bedrooms upstairs with bathroom downstairs</p> <p>These not good layouts for families. Most families will want at least 3 bedrooms and a bathroom upstairs hence why pitched roofs always get converted. It is unfair that PD rights arbitrarily penalise families who live in one type of roofed house VS another, especially when the feature concerned (a V roof) is hidden behind a parapet and only viewable from the rear.</p>	<p>The Greenwich Character Study identifies a number of typologies that define the residential neighbourhoods in the borough. Understanding the specific characteristics such as typical roof form, facade arrangement and materiality of each typology is a prerequisite to establishing an appropriate design approach for an extension. A design for an extension may be appropriate for one typology but entirely inappropriate for another typology. This includes the loss of 'V' shaped rooves which would result in changing the architectural character and relationship to the street. Whilst it is acknowledged that mansard rooves may be considered acceptable to some street in Woolwich. This cannot be transferred to another street which will have a different character to the area. Furthermore, each borough has their own set of characteristics and local policies. Therefore, these cannot be transferred from borough to borough.</p> <p>Each application submitted to the Royal Borough is assessed on a case by case basis. The aim of the urban design guide is to provide explicit guidance on what would be considered acceptable and not acceptable within the borough.</p>
Anonymous received via Commonplace		N/A	<i>Creating well designed, well connected, inclusive places</i>	D	<p>We welcome the positive references to reducing reliance on private cars (D.3.1 and subsequent sections), to waste and recycling arrangements (D.3.4), to parking arrangements (D.3.5, and to cycle parking (D.3.6)). There is also good material on these issues in Chapter E. Again, we would recommend that these be phrased as mandated design elements rather than as lists of possible approaches, which leave plenty of wriggle-room for developers who do not want to comply.</p>	<p>The SPD can only provide guidance which supports the existing policies within Local Plan, it cannot introduce new policies. Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	<i>Making better use of land and buildings</i>	C	<p>Principle F2: Building Height. We welcome the Draft SPD's proposals that appropriate building height for development should be determined by the context, rather than by absolute measurements. Scale, massing, and height should relate to local existing or emerging character, and applicants should justify their approach in response to existing building height. However, if the existing height context includes recent developments that have added height to the context, e.g. by adding a floor at roof level, this could lead to gradual increases in context heights, allowing developers to push for further height in their proposals. In other words, if the emerging character of a locality is one of taller building, then developers may try to continue the trend, adding to the impacts on the character of an area. With appropriate height determined by context, and context subject to pressure, then intensification is more likely to occur. Consideration of acceptable building height should take account of the historical context and be responsive to it, rather than being encouraged by more recent developments. This principle should also apply to D.1.1-D.1.7, on place-making.</p> <p>We also note that Figure f.1 on p. 176 suggests that large areas of the borough are considered 'Highly Varied', which may leave them more open to pressure to build taller and larger buildings.</p>	<p>The wording of the principle states that "Applicants need to understand and justify their approach to height in response to the existing height context (specific heights of neighbouring and nearby buildings within the adjoining streets and prevailing heights in the wider area) and any relevant plans or guidance that may stipulate the future approach to height in the locality" Furthermore, principle B.6.2 states that; "In areas whose character is more sensitive to change (which includes areas of historic and architectural value (ed.)), development will need to be contextual and respond sensitively to and integrate with the prevailing pattern of development and characteristic features. This should consider aspects of massing, height, built form, articulation, roof form, colours and materials". The principles stated should be strong enough to prevent any undesirable misinterpretation. Additionally, the height and context would be determined by both context of the existing area and the impact of the development of the existing host building. Therefore, where a site has been intensified, consideration would be given to the historic form and whether additional floors would have to be in keeping with the existing building and context of the site.</p>

Anonymous received via Commonplace		N/A	<i>Making better use of land and buildings</i>	C	<p>Principle F2: Building Height. We welcome the Draft SPD's proposals that appropriate building height for development should be determined by the context, rather than by absolute measurements. Scale, massing, and height should relate to local existing or emerging character, and applicants should justify their approach in response to existing building height. However, if the existing height context includes recent developments that have added height to the context, e.g. by adding a floor at roof level, this could lead to gradual increases in context heights, allowing developers to push for further height in their proposals. In other words, if the emerging character of a locality is one of taller building, then developers may try to continue the trend, adding to the impacts on the character of an area. With appropriate height determined by context, and context subject to pressure, then intensification is more likely to occur. Consideration of acceptable building height should take account of the historical context and be responsive to it, rather than being encouraged by more recent developments. This principle should also apply to D.1.1-D.1.7, on place-making.</p> <p>We also note that Figure f.1 on p. 176 suggests that large areas of the borough are considered 'Highly Varied', which may leave them more open to pressure to build taller and larger buildings.</p>	<p>The wording of the principle states that "Applicants need to understand and justify their approach to height in response to the existing height context (specific heights of neighbouring and nearby buildings within the adjoining streets and prevailing heights in the wider area) and any relevant plans or guidance that may stipulate the future approach to height in the locality." Furthermore, principle 8.6.2 states that; "In areas whose character is more sensitive to change (which includes areas of historic and architectural value (ed.)), development will need to be contextual and respond sensitively to and integrate with the prevailing pattern of development and characteristic features. This should consider aspects of massing, height, built form, articulation, roof form, colours and materials". The principles stated should be strong enough to prevent any undesirable misinterpretation. Additionally, the height and context would be determined by both context of the existing area and the impact of the development of the existing host building. Therefore, where a site has been intensified, consideration would be given to the historic form and whether additional floors would have to be in keeping with the existing building and context of the site.</p>
Anonymous received via Commonplace		N/A	<i>Creating more sustainable, biodiverse places</i>		<p>PLEASE revisit the original proposals for around Abbey Wood station. We were promised trees, shrubs, and flower beds but we have a lot of hard landscaping which has turned into car parks and/or long queue of cars picking up people from the station. This area could be amazing but looks neglected</p>	<p>This consultation relates to the Urban Design SPD which is intended to inform and guide the quality of design for all new developments within the Royal Borough. It cannot revisit existing proposals which have planning permission.</p> <p>With regards to the developments surrounding Abbey Wood Station, we recommend checking the existing planning permission which was granted and contact our Planning Enforcement Team (with the associated planning reference number) if you believe a breach in planning may have occurred. This includes developments which were not built to plan.</p>
Anonymous received via Commonplace		N/A	<i>Enabling good quality household extensions</i>		Will you extend our council houses?	This issue exceeds the scope of the SPD.
Anonymous received via Commonplace		N/A	<i>Making better use of land and buildings</i>	C	<p>This is a good and thoughtful policy. However, it is important to note that Greenwich has some of the highest housing costs in the country, and more could be done to sustainably increase intensification of land use across the Borough. I note a number of comments below:</p> <p>C.1.1: It is unclear to me why the large industrial site between Woolwich and Plumstead has not been redesignated as a site for housing - but if the Council believes it is important to maintain industrial uses here, could it not be turned into a mixed use site with a combination of light industrial uses at ground level, with housing built on top.</p> <p>Likewise, more of Charlton Riverside could be redesignated as a site for intensification. Housing could be built on top of the big box retail sites. It would also be possible to increase density in Eltham.</p> <p>C.1.2. Block consolidation strikes me as a sensible way to improve density, in an environmentally sustainable manner.</p> <p>C.2.2: It seems overly limiting to restrict height extensions to two storeys in areas of less coherent character. Extensions should be judged on the basis of the quality of the proposal, rather than applying a blanket height policy. For instance, it would be appropriate to allow high quality extensions of several storeys in areas of Woolwich Town Centre that already have many high rise buildings.</p> <p>C.2.3: I support the emphasis on active uses of ground floors in urban developments. The principle should also encourage cafes / bars as well as shops. I support the emphasis on increasing density while respecting local heritage.</p>	<p>With comments regarding C.1.1, the council will be launching a "call for sites" exercise as part of developing a new Royal Greenwich Local Plan. This could consider the redesignation of the site and assess whether it is necessary to continue to protect the industrial uses. However, this is outside the scope of the Urban Design Guide SPD.</p> <p>Charlton Riverside is a designated Opportunity Area which has the potential to deliver up to 8,000 new homes (as identified in the London Plan 2021). The existing Charlton Riverside SPD does encourage a mix of uses in the area where appropriate, which includes the retention of industrial units at ground floor level and residential above.</p> <p>Eltham has been identified as an area which includes an intensification corridor.</p> <p>With regards to comments relating to C.2.3, the SPD can only provide guidance to support the existing Local Plan Policies. All development proposals will be assessed using Policy DH1 of the Local Plan which relates to high quality design and Policy D3 of the London Plan.</p> <p>All supporting comments have been noted.</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Anonymous received via Commonplace		N/A	<i>Making better use of land and buildings</i>	B	<p>The Document touches on the question of affordable housing (Principle B.1.2 and c.91). It should be clear that it is a requirement (rather than optional) to increase the amount of affordable housing in new developments and estate regenerations. Ideally the Document would set specific targets around affordable housing and also set specific requirements for amenities such as Doctors' surgeries: Greenwich Peninsula, for example, has the highest ratio of population to GPs in the country.</p> <p>We welcome the commit to provision of space for communal gardens and urban farming (b.80). However, as with many sections of this guidance, we would recommend this is more directive, rather than saying 'as far as practicable' or 'wherever possible'.</p>	<p>With regards to comments regarding affordable housing and community garden provision, SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies.</p> <p>The current local plan, together with the London Plan has specific policies regarding affordable housing provision (See Policies H6 and H8 of the London Plan and Policy H3 of the Local Plan, which requires developments of 10 or more housing to provide 35% affordable housing).</p> <p>Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>

Anonymous received via Commonplace		N/A	<i>Creating well designed, well connected, inclusive places</i>		Overall, support these proposals. My one comment is that waterside development seems not to be covered sufficiently, especially as RBG has an extensive river frontage, not only the Thames, but Deptford Creek and elsewhere. A commitment to public access where it does not currently exist should be included; as should the provision of interpretative facilities such as signboards to highlight significant historical features and biodiversity, for example	With regards to comments regarding public access to waterside development Furthermore, The London Plan (2021) Policy SI 16 states that 'Development proposals along waterways should protect and enhance inclusive public access to and along the waterway front and explore opportunities for new, extended, improved and inclusive access infrastructure to/from the waterways'. Any development along the waterside will be assessed against this policy. With regards to comments regarding signage and the incorporation of more waterside development policies within the Local Plan, SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. Furthermore, we are working to produce a new local plan which will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Anonymous received via Commonplace		N/A	<i>Creating well designed, well connected, inclusive places</i>	D	These are very admirable ambitions. It is so important however that these are carried through. I find when visiting my friends on the new Kidbrooke Estate that it is very hostile to visitors. Please note that there is a very hard attitude towards parking and it is only too easy to go away and give up because of the parking restrictions. There are no bus services nearby as the roads are like a labyrinth and unsuitable for buses. Then it is hard to find which is the block of flats where your friend lives as I can find no plan of the blocks or house names on the buildings. They are a long way from any friendly streets or shops where you could ask for help. I think that householders should be allocated a newly-planted tree near where they live to water and look out for in a neighbourly way. It is sad to see them die through neglect.	With regards to parking restrictions within the Kidbrooke Estate and the allocation of new trees to residents falls outside the remit of planning. With regards to wayfinding for sights this could be included into the Urban Design SPD. With regards to comments regarding wayfinding for buildings, the guidance does include reference to integrated signage within street design, street art and differing building sizes to make wayfinding easier. Additional text will be added to recommend blocks to clearly name the blocks to help with legibility. However, it should be noted SPDs can only provide guidance to inform planning decisions. It cannot create new policies. he council is in the process of developing new Local Plan. The issues and options consultation is due to go out June this year and any comments on what you would like to see within the new local plan should be submitted to this consultation when it goes out.
Anonymous received via Commonplace		N/A	<i>Making better use of land and buildings</i>	F	It is great the amount of development in Woolwich. However, it seems to me that the new mega tall buildings are being built without any sense of direction nor good quality of living. There is lack of homogeneity with super tall buildings next to 5 stories buildings. There should not be ginormous buildings so close to each other as it completely destroys the views and air circulation. Despite more efforts for greenery, Woolwich continues to lack personally as well as safety and building design planning. There is definitely much to improve. Starting first with the Berkeley tall buildings accumulated in front of the Waterfront Leisure Centre. Please do not allow to have such tall buildings being accumulated in on area. Secondly, the storefronts of Powis street need to feel more welcoming, this will attract many more vendors to the area. Powis street could potentially become a popular high street in South East London, a venue where people enjoy going for outdoor retail shopping, which there is currently none in East London. The project of creating a supertall buildings in front of the Tesco feels out of place, making the area look poorly organised. In terms of greenery in Woolwich, parks seem to be badly maintained and without any design that incentivizes people to go. There should also be more sports facilities within parks, such as tennis courts nearby.	Woolwich is a designated Opportunity Area which has the potential to deliver up to 5,000 new homes (as identified in the London Plan 2021). The Woolwich Town Centre Master Plan was published in 2012 which provides guidance for developments within the area and where we would like to place housing to meet our housing requirements as set out by the Greater London Authority. Regarding to shop fronts, section H of the SPD does provide guidance on signage depending on the character of the building and existing streets. Additionally, further guidance is provided on signage which impacts on heritage assets including sites within conservation areas. Furthermore, the council has produced a Characterisation Study and Tall Building Study which was used to inform the SPD. Its findings will be used to develop policies in the new Royal Greenwich Local Plan, including the appropriate locations for tall buildings and addressing issues related to greening and provision of sports facilities. The new local plan will set out the Council's vision for the development of Royal Greenwich over a 15-year period. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Agent representing Business/Land owner		Notting Hill Genesis	<i>General comments</i>		We believe that the images throughout the guide rely too heavily on Royal Arsenal, which has set up a new height datum for Woolwich Town Centre. Whilst it has incorporated historic buildings into the masterplan successfully and is overall a good example of positive change, we feel that it cannot be called contextual, which is one of the guiding principles of this document.	A mix of images has been included in the SPD. While some of them are about Royal Arsenal, others show other areas and developments in the Royal Borough.
Agent representing Business/Land owner		Notting Hill Genesis	<i>Creating well designed, well connected, inclusive places</i>	E	E Streets and Spaces The aspiration is for the Borough to be car free; this is an admirable aim. However, we would question whether this is realistic in a borough with many suburban areas, many of them with low PTAL. There should be more consideration of the requirement for car parking in certain locations within the borough where there is a low PTAL and the transport links are not as well developed.	As clearly stated at paragraph d.76 "The London Plan 2021 and Royal Borough of Greenwich policies both control the amount of parking for developments based on the assessment of needs. These policy documents should both be referred to for guidance on parking standards ".
Agent representing Business/Land owner		Notting Hill Genesis	<i>Creating well designed, well connected, inclusive places</i>	D	D3.4 servicing – We believe that the reference in d.73 to underground refuse collection is not helpful unless the borough supports this.	d.74 (previously d.73) has been revised as follows: "Communal underground waste and recycling drop-off facilities operate successfully in many European cities. These are unobtrusive and well integrated in the street scene and facilitate a greater separation of recyclable materials, and avoid the need to collect a plethora of recycling and waste bins from individual property. Where Developers propose to design underground waste facilities, collection points or alternative technologies, they need to consult with the Waste Strategy Team before submitting their application to the Planning Department. The Council will consider proposals of innovative technologies providing it can be demonstrated to be effective in collecting high recycling rates with low levels of contamination ".
Agent representing Business/Land owner		Notting Hill Genesis	<i>Making better use of land and buildings</i>	B	B.12 Carbon impact should also mention form factor, that is, that simple building forms create less heat loss. This is a key principle in designing buildings with sustainability in mind.	Building form is already acknowledged as one of the elements to be carefully considered to reduce carbon impact in Principle B12: "Development should be design to net zero standards... this includes: Adopting passive design principles and fabric first approach and focusing on their thermal performance, form factor , orientation, solar gain". Note that the SPD provides only high-guidance on sustainability and reducing carbon impact. The council is in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030.

Agent representing Business/Land owner		Notting Hill Genesis	<i>Making better use of land and buildings</i>	B	B Strategic considerations B3 Responding to Accessibility – b.12, should be updated as the Elizabeth line has now been delivered and is in use.	Noted. Paragraph b.12 has been revised to acknowledge that the Elizabeth Line has now been delivered and is in use.
Agent representing Business/Land owner		Notting Hill Genesis	<i>Making better use of land and buildings</i>	B	8.5 Appropriate density: pages 34 and 35 – a discussion on density is welcomed, and the chapter also notes that intensification is required and desirable. The guide supports higher densities at PTAL 3 and higher and we agree that this is appropriate. However, the table on page 35 recommends densities of less than 40 u/ha on suburban sites and less than 75 u/ha on compact urban settings. At these low densities new infill is unlikely to be financially viable and design quality will suffer as a result.	Noted. The caption below Figure b.5 has been revised as follows: Existing dwelling density within the borough
Agent representing Business/Land owner		Notting Hill Genesis	<i>Making better use of land and buildings</i>	C	We believe that the suggestions for transformation in figure c.11 are not meaningful unless the quality of the corridor is improved.	Noted. The point raised is understood. However, the diagrams on figures from c.8 to c.15 only intend to provide a general classification of urban corridors conditions and approaches to intensification. The development of the new Royal Greenwich Local Plan will provide an opportunity to address the issues associated with urban corridor roads in Royal Greenwich more holistically and in detail. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Agent representing Business/Land owner		Notting Hill Genesis	<i>General comments</i>		The introduction states there are principles and standards for new development set out in the guide, in the draft guide it appears only principles are set out.	Noted. The term "standards" has been removed from paragraph a.3.
Agent representing Business/Land owner		Notting Hill Genesis	<i>General comments</i>		We have noticed an inconsistency in the chapters whereby some chapters refer to 'Further Guidance' next to the blue box setting out the principle and its key points, and others do not. For example, Chapter B does, but Chapters C and D do not.	Noted. There is some reference to "further guidance" in Chapter D, Principles D.3.5 and D.3.6. Chapter C provides high-level guidance for the identified area types, which are specific to Greenwich. References to further national, regional and local guidance are concentrated in the other "topic based" chapters.
Agent representing Business/Land owner		Notting Hill Genesis	<i>Creating well designed, well connected, inclusive places</i>	F	F Building Design F.3 Tall and Large Buildings – The references to the tall buildings study on pgs. 178 and 181 is out of date, referring to a publication in 2021, the current Tall Building Assessment was published (final) in March 2023 and should be corrected.	Noted. This has been corrected to refer to the Tall Buildings Assessment (2023).
Agent representing Business/Land owner		Notting Hill Genesis	<i>Making better use of land and buildings</i>	C	Principle C2.4 Post-War Housing Estates - urban design principles should be highlighted in repair of post war estates. Principle should include possibility of additional height buildings, not just extensions, as otherwise new infill development/intensification of estates may not be viable.	Principle C2.4 does not exclude the possibility of new elements of height in existing post-war estates, with the caveat that "Additional height and massing of new development and upward extensions should be carefully considered to avoid adverse impacts on: + the character and coherence of the estate or neighbouring areas. ..."
Agent representing Business/Land owner		Notting Hill Genesis	<i>Creating well designed, well connected, inclusive places</i>	E	E2 Street types and Enclosure – We feel that this section is overly prescriptive and unrealistic especially on corridor and avenues. We suggest that if these metrics are included you should show examples of Plumstead Road at Royal Arsenal, Kidbrooke Village or Greenwich Peninsula where this desirable 1:1 ER is exceeded.	SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. The identified street types in the SPD are not prescriptive. They are useful to identify the different types of issues and solutions associated with streets in Royal Greenwich. The recently adopted RBG Transport Strategy provides much more detail on these issues.
Agent representing Business/Land owner		Notting Hill Genesis	<i>Making better use of land and buildings</i>	C	C Intensification In C.2.2 it is difficult to read the maps (pgs. 68 and 76), partly due to image quality and partly scale. We agree with statements made on corridor improvement, but this must be led by the Borough, e.g., principle c.37.	The Borough is aware of its role in promoting the improvement of its urban corridor roads, which is something that can be addressed in the development of the new Royal Greenwich Local Plan. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period. We will investigate if a higher-resolution version of the SPD can be uploaded to the Council website.
Agent representing Business/Land owner		Notting Hill Genesis	<i>Making better use of land and buildings</i>	C	C2.5 – We would argue that the image on page 94 is not very contextual. The guide would benefit from some alternative examples, preferably in the Borough.	The building at page 94 is an example of a scheme with a legible, contemporary character, well integrated within the surrounding historic context in terms of its scale and materiality.
Agent representing Business/Land owner		Notting Hill Genesis	<i>Introduction</i>	A	Page 22 – The process diagram should mention the Client's Brief. This is where the objectives, type and quantum of development and vision for the site are set out.	The diagram at page 22 focuses on the pre-application design process and its integrated engagement with the Council and local communities. It does not cover the relationship between clients and hired consultants/designers, which exceeds the scope of the SPD.
Agent representing Business/Land owner		Notting Hill Genesis	<i>General comments</i>		Although sustainability is one of the 3 core objectives, we believe that some of the example designs shown (for example, pgs. 1, 8 and 94) do not demonstrate either good sustainable principles (form factor) or show real sensitivity to context. We feel that it would be useful if other examples, perhaps within the borough even if historic, could be included in the document.	The examples used in the SPD are considered of good quality in urban design and architectural terms. It is understood that not all the pictures in the document show highly performing schemes in sustainability terms.
Agent representing Business/Land owner		Notting Hill Genesis	<i>Introduction</i>	A	Page 9 – Provides a good summary of key supporting policy context but we feel that the London Housing SPG (draft) should also be mentioned in addition to the 2021 London Plan.	The GLA Housing Design Standards LPG has been added to the list.
Agent representing Business/Land owner		Notting Hill Genesis	<i>Creating well designed, well connected, inclusive places</i>	D	D2.3 fine urban grain – this is unlikely to be practical at densities required for new development, especially with new fire regulations coming into effect.	The SPD is only guidance. It is not prescriptive, however it indicates fine-grained developments as a desirable approach to create welcoming, inclusive places, well integrated within the historic character of Royal Greenwich.

Agent representing Business/Land owner		Notting Hill Genesis	<i>Creating well designed, well connected, inclusive places</i>	F	We feel that the guide should recognise that design constraints and considerations can change over time as scheme designs have to accommodate changes in regulation and policy. As an example, this can be seen clearly in the emerging guidance and regulations concerning tall buildings and the introduction of secondary staircases in residential cores. The flexibility to change design approaches and principles to adapt to these factors in the future must be acknowledged.	The SPD provides high level guidance on a wide range of topics, based on design principles that are flexible enough to work for all different conditions. For more strict standards and policies, there are National, Regional and Local policies and building regulations that cover these raised issues in much more detail.
Agent representing Business/Land owner		Notting Hill Genesis	<i>Creating well designed, well connected, inclusive places</i>	D	D1.7 (pg.121) – We would ask RBG to define what a third space is in practice.	Third places is a term coined by sociologist Ray Oldenburg. It is commonly used to refer to a wide range of places where people spend time between home ('first' place) and work ('second' place). They are locations where people exchange ideas, learn new skills and build relationships. This is explained at page 121-d 441: "Development should facilitate social inclusion and celebrate diversity. Larger development schemes should consider how they provide 'third places', which are public or communal spaces, where people from all backgrounds, incomes and demographics are welcome, can meet and interact outside the home and work environment. Third places offer friendly, safe, easy access and inclusive social spaces. For example these could be provided in and by cafes, community centres, religious and cultural facilities, libraries and other communal facilities. They are neutral spaces where people can meet in public and are accepted whatever their background".
Agent representing Business/Land owner		Notting Hill Genesis	<i>Making better use of land and buildings</i>	C	Principle C2.8 Industrial Land – the no net loss of industrial use principle can become a real barrier to redevelopment and can also work against placemaking objectives. Some flexibility to broaden the use class would be helpful to fully optimise and intensify these sites.	This point exceeds the remit of the SPD. SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new policies. An issues and options "big themes" consultation for the new Royal Greenwich Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Agent representing Business/Land owner		Notting Hill Genesis	<i>Making better use of land and buildings</i>	C	In c50 allowing parking along these corridors to restrict driving flow would reduce the dominance of traffic and support local businesses.	This point exceeds the remit of the SPD. The upcoming development of the new Royal Greenwich Local Plan will provide the opportunity to address this issue more in detail. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Agent representing Business/Land owner		Notting Hill Genesis	<i>Creating well designed, well connected, inclusive places</i>	F	The entire chapter does not appear to address the topics of building organisation and access and we feel that the document would benefit from this.	This SPD provides high level guidance on a wide range of topics. It points to further guidance for more detail. The SPD will contribute to create a fully integrated, hierarchised suite of local policies and guidance, in an intermediate position between the new Local Plan at the top and more specialised, design-related, supplementary documents at the bottom, which could include design codes for specific area-types or locations in the Royal Borough.
Agent representing Business/Land owner		Notting Hill Genesis	<i>Creating well designed, well connected, inclusive places</i>	D	Examples of good and bad practice in this chapter are helpful but for example, image d.16 'large monotonous facades', could also be said of London Georgian terraces or for that matter Regent Street. This is more about design quality.	We do not agree with this point. Georgian terraces have a wide set of qualities to do with their scale, pace, interface with the street, amenity space, customisation of doors, front gardens and other features that can't be found in the example on image d.16
Individual		Pieter van der Merwe	<i>Characterisation Study, Tall Buildings Assessment and Heritage Appendix</i>		Just looking at the Heritage appendix, West Greenwich p. 17, Listed buildings: 'The Prestbury', '66 Croom's Hill, surely means 'The Presbytery' though its other name is Heathgate House. 17 West Grove was I think formerly 'Manor' rather than 'Manna' Mead but it was only for a brief time as a nursing home in the early 20th c. and I wonder why it's still referred to as that at all.	Noted. The text in the Heritage Appendix has been corrected accordingly with the point raised.
General and specific consultation bodies		Port of London Authority (PLA)	<i>Creating more sustainable, biodiverse places</i>	G	Principle G.2.3 (Noise, Air and Light Pollution) Whilst this principle is broadly supported it is considered that must be a direct link to principle C.2.8 on industrial areas and the section on the potential need for nearby residential development to incorporate acoustic mitigation measures in line with the Agent of Change principle.	Noted. A paragraph has been added to G.2.3 clarifying that "all proposed residential developments in the proximity of industrial or other noisy areas should incorporate adequate pollution and noise mitigation measures, in line with the Agent of Change principle, as stated by Policy D13 of the London Plan".
General and specific consultation bodies		Port of London Authority (PLA)	<i>Making better use of land and buildings</i>	C	Safeguarded Wharves: It is disappointing that there is no mention of the six safeguarded wharves located in the borough. Reference should be given to the various design considerations that nearby development must take into consideration to ensure that both future residents are protected from various impacts (such as noise and air quality) and also that operations can continue at these wharves without risk of complaint.	Noted. A paragraph has been added to paragraph c.148 of Chapter C.2.8 Industrial Areas, acknowledging the six safeguarded wharves in the borough. The Urban Design Guide SPD is high-level guidance, which covers a wide range of interrelated topics. Therefore, it can't enter the detail of each topic but in some cases just point to the relevant guidance/policies on the subject at the national, regional and local level. This said, Point c.151 of Principle C.2.8-Industrial Areas will be revised as follows: "Development in industrial areas should aim to make more efficient use of land for industrial and light industrial uses, to minimise externalities and impacts from traffic, noise, odours and pollution onto neighbouring areas, and to enhance the quality of the environment and the provision with facilities and amenities for workers. Where residential development neighbouring industrial areas and protected wharves are acceptable in policy terms, they should incorporate all necessary uses to ensure that future residents are protected from all those forms of pollution. At the same time, they should also ensure that operations can continue at those industrial sites and wharves without risk of complaint" .
General and specific consultation bodies		Port of London Authority (PLA)	<i>Making better use of land and buildings</i>	B	Principle B.10 (Consider and connect to strategic open spaces / green and blue infrastructure. Reference should be given to the Estuary edges guidance (https://www.estuaryedges.co.uk/) which outlines some methods and principles that have been used to reverse the impacts of encroachment and/or soften banks in urban estuaries.	Noted. A reference to the Estuary edges guidance has been added to Principle B.10.

General and specific consultation bodies		Port of London Authority (PLA)	<i>Making better use of land and buildings</i>	C	Principle C.2.8 (Industrial Areas) To strengthen this further there should be reference in this section, or within section G.2.3 (Noise, air and light pollution) that when development proposals are situated in close proximity to industrial areas (including safeguarded wharves) that early contact should be made with existing operators to ensure that the required impact assessments required to support an application (such as noise, vibration and air quality assessments) fully assess and mitigate the potential impacts that prospective new users of a development may experience due to the operations at these sites.	Noted. The SPD provides high guidance only on this issue. This will be addressed more in detail in the development of the new Royal Greenwich Local Plan. An issues and options "big themes" consultation for the new Royal Greenwich Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
General and specific consultation bodies		Port of London Authority (PLA)	<i>Creating well designed, well connected, inclusive places</i>	E	Principle E.3.4 (Street Furniture) As part of this principle consideration should be given to specific public realm and street furniture requirements in riverside areas, including riparian life saving equipment (such as such as life buoys, grab chains and escape ladders) as well as consider other design aspects such as edge protection, lighting and suicide prevention measures (CCTV/signage) in appropriate locations along riverside paths. This would be in line with the PLA's 'A Safer Riverside' guide for development on and alongside the tidal Thames. (http://pla.co.uk/Safety/Water-Safety/Water-Safety).	Npted. A reference to the Port of London Authority's 'A Safer Riverside' guide has been added to Principle E.3.4
General and specific consultation bodies		Port of London Authority (PLA)	<i>Creating well designed, well connected, inclusive places</i>	E	There should be reference to the need to consider the design of pedestrian footpaths, to and from a development site along riverside areas in the proximity of safeguarded wharves, acknowledging the challenges in finding the best route near operational wharves and terminals, and that this will require a pragmatic solution to achieving appropriate, safe access around these sites taking into account safety, regulatory and operational requirements of operators.	The SPD provides high level guidance on a wide range of topics. It will sit in a intermediate position between RBG Local Plan and other future, more specialised supplementary documents, including design codes, which can deal with specific area types and places in Royal Greenwich, including riverside areas.
Agent representing Business/Land owner	Collectiveplanning	Sabreleague - Lydean Estate	<i>Making better use of land and buildings</i>	C	The supporting text in paragraph C.152 defines industrial intensification as the development of an industrial area which provides industrial floorspace that is greater than the existing floorspace and references Policy E7 of the London Plan. This is an incorrect definition of industrial intensification because Policy E7(C) of the London Plan does not require a greater provision of existing industrial floorspace nor does it specify the quantum of floorspace to be re-provided for all types of industrial uses... Policy EA(a) of the RBG Core Strategy seeks to protect existing employment space rather than industrial floorspace as part of a residential or mixed use development. The client therefore considers that the definition in the supporting text in Paragraph C.152 is reworded to include the provision of employment space so it is consistent with the intention of Policy E7 of the London Plan and Policy EA(a) of the RBG Core Strategy as follows: Supporting Text C.152 of UDG SPD "Industrial intensification is defined as development of an industrial area where the development provides an appropriate level of employment floorspace in accordance with the Local Plan policy".	Noted. Paragraph c.152 has been revised as follows: "Industrial intensification can be defined as a more efficient, sustainable use of an existing industrial land, for example through higher plot ratios, to create opportunities for mixed use developments while preserving and possibly increasing the existing provision of industrial/employment space".
Agent representing Business/Land owner	Collectiveplanning	Sabreleague - Lydean Estate	<i>Making better use of land and buildings</i>	B	Figure B.5 'Dwelling Density within the Borough' appears to illustrate the existing dwelling density within the Borough. The client requests that this is clarified within the title so it is clear for plan users.	The caption under Figure B.5 has been changed to " Existing dwelling density in the Borough"
Agent representing Business/Land owner	Collectiveplanning	Sabreleague - Lydean Estate	<i>Making better use of land and buildings</i>	B	Proposed changes to Principle B.15 (in bold): "Before considering wholesale demolition of existing structures, development should consider potential reuse of existing building stock and infrastructure where applicable through sensitive and well-considered re-development. Where applicants propose demolition and new development, they should demonstrate that any opportunities for retrofit have been explored proportionate to the condition of existing building(s), location and policy designations and discounted as a viable alternative to more carbon intensive new development".	The proposed editing of Principle B15 is not considered to be necessary as it is already clear about the necessary practicality and viability of the retrofit approach in order for it to be preferable to other more carbon intensive approaches.
Agent representing Business/Land owner	Collectiveplanning	Sabreleague - Lydean Estate	<i>Making better use of land and buildings</i>	B	The following amendments to Principle B.5 of the UDG SPD are recommended (in bold): Principle B.5 "Higher density developments that may include a significant uplift in the average density (above 150 units/ha) should generally be concentrated in areas of PTAL 3 or higher or that are less than 800m from a rail, DLR or underground station, and also located less than 10 minutes (maximum 15 minutes) from a local centre, primary school and major open space."	The proposed editing of Principle B5 is not considered to be necessary as it is already clear on the locations where these higher density schemes are encouraged.
Agent representing Business/Land owner	Collectiveplanning	Sabreleague - Lydean Estate	<i>Making better use of land and buildings</i>	C	Principle C.2.8 of the UDG SPD requires the re-provision of spaces for existing local businesses. The principle written in its current form is unclear but appears to infer the re-provision of existing employment space for local business. The re-provision of the same quantum of industrial floorspace for developments is contrary to Policy EA(a) of the RBG Core Strategy which supports residential and mixed-use development if employment space is provided without specifying the quantum.	The definition of industrial intensification in the SPD has been revised to be more clearly in line with the London Plan Policy E7.

Agent representing Business/Land owner	Collectiveplanning	Sabreleague - Lyndean Estate	<i>Creating well designed, well connected, inclusive places</i>	D	<p>Principle D.1.6 supports compact development rather than tall buildings to meet density requirements as they respond to the surrounding context. This principle is in conflict with the Tall Buildings policies in areas earmarked for Tall Buildings within the local plan which explicitly allows for tall buildings in sustainable locations such as Abbey Wood...</p> <p>The design principle in its current form does not allow for design-led developments as it restricts tall buildings in tall building zones, which is contradictory to local plan policies and therefore disregards the positive contribution they make to the overall density requirements and housing targets. Therefore, it is requested that Principle D.1.6 is amended to enable tall buildings to maximise density in appropriate locations where they are designed to have acceptable impacts on the surrounding context as follows:</p> <p>Principle D.1.6</p> <p>"Compact development can provide a successful way to delivering higher densities whilst responding contextually to the local characteristics of places. Compact development in many instances will be more appropriate than taller buildings in achieving higher densities in areas that are more sensitive to change. However, tall buildings in identified tall building zones are considered acceptable subject to appropriate design which responds to its surrounding context." (Original wording shown as italicised, recommended wording shown as bold, underlined and strike-out).</p>	<p>The SPD is coherent with London Plan - Policy D9 and its following paragraph 3.9.2, which states that suitable locations for tall buildings should be identified by plan : Boroughs should determine and identify locations where tall buildings may be an appropriate form of development...</p> <p>The fact that high-density does not necessarily imply tall buildings is clearly stated by paragraph 3.9.1 of the London Plan.</p> <p>The issue regarding areas in Royal Greenwich suitable for tall building will be addressed more in detail by the new Royal Greenwich Local Plan and its consultation process, which will include all gathered evidence base, including the Tall Buildings Assessment. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Individual		Sean McGrawth	<i>Creating well designed, well connected, inclusive places</i>	F	<p>Paragraph f.88 states that proposals should normally avoid inconsistent roof pitches on the same or adjacent buildings. There is no explanation for this. It states that different roof pitches can 'generate clumsy juxtaposition'. What does this actually mean and why is it harmful?</p>	<p>Adjoining, different roof-forms introduced on a coherent roofscape and street facade can impact negatively on its legibility and visual appeal. This is a general principle about roof forms. There are always exceptions to it, which are not excluded by the SPD but should be fully justified in urban design and conservation terms.</p>
Individual		Sean McGrawth	<i>Making better use of land and buildings</i>	B	<p>Section B4 – Creating Walkable Neighbourhoods</p> <p>Is there any evidence that '15 minute neighbourhoods' actually work, and will they work in Greenwich where a great many people will commute to work?</p>	<p>The basic principle that all key services for daily life should be available within short walking distance from home is at the base of all more successful neighbourhoods in the UK and European cities. The concept helps to encourage sustainable travel patterns, however this does not prevent people travelling longer distances to reach other preferred or needed services or locations.</p>
Individual		Sean McGrawth	<i>Making better use of land and buildings</i>	B	<p>B.6 – Responding to Local Character, Principle B.6.2 and Figure b.7</p> <p>The assessment of Character Areas is too subjective and too simplistic. The very nature of London means that character of an area can change within a very short distance. It is also incorrect. I simply do not agree with the analysis of my neighbourhood.</p>	<p>The Character area typologies in Royal Greenwich map at page 37 is a high level analysis to facilitate the explanation of the urban design methodology for new development in RBG underpinning the SPD, which starts from a comprehensive analysis of each site's characteristics and their surrounding context.</p>
Individual		Sean McGrawth	<i>Making better use of land and buildings</i>	B	<p>Splitting Greenwich into areas that are: highly sensitive to change; sensitive to change; somewhat sensitive to change; and low sensitivity to change is unhelpful. The designations will prevent acceptable development and investment coming forward. The only locations that should be sensitive to change are conservation areas. Outside conservation areas, neighbourhoods are capable of accommodating change and development. They have done so in the past and will continue to do so.</p> <p>It should be acknowledged that outside conservation areas, all other areas can accommodate change. Principle C.1.4 refers to areas with a 'less coherent character'. Assessing the coherence of a character of an area would be more productive. The only differentiation should be: areas with a coherent character, which will be conservation areas; and areas with a less coherent character, which is everywhere else.</p>	<p>The sensitivity areas are not formal designations but are a high level analysis of each area's sensitivity to change which is then used to inform a design approach to new development. This approach is in line with the GLA Characterisation and Growth Strategy London Plan Guidance. It is not intended to stymie development only to inform the design process so that new development appropriately responds to its context.</p>
Individual		Sean McGrawth	<i>Enabling good quality household extensions</i>	I	<p>Principle I.1.1: Permitted Development Rights</p> <p>The SPD should make allowance for 'permitted development rights', and it is pointless expecting householders to accord with the SPD if they are not required to. If extensions that dominate the existing building in height, bulk or area are acceptable through permitted development rights, they will happen. Outside conservation areas, development that is acceptable under permitted development rights should be acceptable for all householders.</p>	<p>The SPD covers all types of extensions, however it is intended particularly for those which are not covered by permitted development rights. In any case, the SPD highlights best practice and promotes good design in all cases, regardless of whether results can be achieved via full planning consent or permitted development.</p>
Individual		Sean McGrawth	<i>Making better use of land and buildings</i>	B	<p>Paragraph b.21 states that designing neighbourhoods to 15-minute principles should "compel" more people to walk and cycle. This discriminates against those with mobility issues. The document should focus on improving accessibility by public transport which can be used by those with impaired mobility.</p> <p>The only real mention of the mobility impaired is in relation to the public realm. The needs of residents with mobility issues should be taken into account in the SPD.</p>	<p>The term "compel" has been replaced with "encourage". The SPD provides high level guidance on a wide range of topics. Important issues around accessibility will be addressed more in detail by the new Royal Greenwich Local Plan. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>

Individual		Sean McGrawth	Enabling good quality household extensions	I	<p>Principle I.3.1: Loft/Roof Extensions</p> <p>Why will loft/roof conversions only be accepted where adequate headroom is achieved without raising the ridge height. Each case should be considered on its merits. There might be some circumstances where raising the ridge height is acceptable. Having a blanket embargo is too onerous and will prevent otherwise acceptable development from coming forward.</p> <p>The SPD also states that roof/loft conversions will only be accepted where 2.1m head height is achieved. If this requirement does not need to be met in permitted development schemes, it should not be applied to householders that are required to obtain planning consent.</p> <p>Principle I.3.1: Loft/Roof Extensions: Ridge Height</p> <p>This states that ridge height must remain continuous over the whole length of a terrace. This fails to recognise that often the ridge height of a terrace will vary because of the topography. Again, this is unduly onerous and will prevent otherwise acceptable development from coming forward.</p>	This is a general principle about roof forms. There are always exceptions to it, which are not excluded by the SPD but should be fully justified in urban design and conservation terms on a site-by-site basis.
Individual		Sean McGrawth	Enabling good quality household extensions	I	<p>Paragraph I.63 states that "planning permission will not be granted to alter or to convert a sloped hip end roof into a flat gable end roof on the side of the house as this would create an unbalanced, overbearing appearance to the property."</p> <p>There will only be an unbalanced appearance if the house is semi-detached and the other property has a hip end roof, or it is at the end of a terrace and the property at the other end has a hip end roof. These should be the only circumstances when converting a hip roof to a gable roof is unacceptable. This is illustrated in Figure I.36 which shows a semi-detached house which would appear unbalanced. Having a blanket embargo is too onerous and will prevent otherwise acceptable development from coming forward.</p>	This is a general principle about roof forms. There are always exceptions to it, which are not excluded by the SPD but should be fully justified in urban design and conservation terms. The text in the SPD has been refined to be clearer on this point.
General and specific consultation bodies		TFL Spatial Planning	Creating well designed, well connected, inclusive places	D	<p>Principle D.3.2 & d.64: we suggest emphasising that reinstated connections should focus on connectivity for pedestrians and cyclists, while maintaining a lack of through access for cars can be acceptable or indeed preferable.</p>	A paragraph has been added to d.64: "Wherever possible development should seek to repair the urban fabric and establish connectivity and greater levels of permeability, by (re-)instating a legible pattern of street blocks. Cul-de-sac layouts and developments that fail to use available opportunities to connect with nearby streets should not be permitted. Development should apply Principle D.2.1 Layout of Street Blocks. Reinstated or enhanced connections should focus on connectivity for pedestrians and cyclists, while maintaining a lack of through access for cars can be preferable in certain cases, including when beneficial to avoid undesirable rat-running on residential streets ".
General and specific consultation bodies		TFL Spatial Planning	Creating well designed, well connected, inclusive places	D	<p>Principle D.3.5: the text on electric vehicle charging points should refer to London Plan standards (minimum 20% active provision, with remaining spaces having passive provision) and the relevant building regulation requirements</p>	A reference to the London Plan Standards (Policy T6.1) has been added in Principle D.3.5.
General and specific consultation bodies		TFL Spatial Planning	Creating well designed, well connected, inclusive places	D	<p>Principle D.3.5: emphasis should be placed on car-free development in this section, particularly in areas with PTAL 4-6, but the starting point for all development across the borough should be car-free, with provision only made if appropriately justified and in accordance with London Plan standards.</p>	In regards to car-parking, the SPD is in line with the London Plan and does not need to reiterate the detailed content of its policies on car parking.
General and specific consultation bodies		TFL Spatial Planning	Creating well designed, well connected, inclusive places	D	<p>Principle D.3.5 and d.93-95: it is not entirely clear how the requirement for multistorey car parks to be structurally independent from residential buildings interacts with the desire to screen parking and provide active frontages. While TFL is supportive of the desire to build in future-proofing and adaptability into new developments, encouraging the construction of large standalone parking structures is not likely to help with this goal, unless there is a robust strategy outlined from the outset for reduction in car parking levels over time and the eventual potential reuse of car parking structures for other purposes. Any carbon impacts arising from such an approach would need to be considered at the outset.</p>	<p>It is understood that the examples in Principle D.3.5 apply to exceptional cases only, including when there is some established right of repossession of car-parking for existing commercial stores on the development site or as part of a wider strategy. In these cases car-parking buildings can substantially reduce the consumption of public realm for car-parking and be easily removed or converted into other uses when the need for car-parking diminishes.</p> <p>For example, the Greenwich Peninsula Masterplan includes two multi-storey car parks incorporating activities to roof and frontages, with the declared objective of removing or reappropriating one of them for other uses, if future demand decreases.</p> <p>Principle D.3.5 and associated figures d.21 and d.22 has been revised to clarify on the exceptionality of this approach.</p>
General and specific consultation bodies		TFL Spatial Planning	General comments		<p>The phrase 'public transport accessibility' is used a few times. The term 'accessibility' has particular connotations associated with, for example, disabled persons' access, TFL suggests this term is avoided when discussing PTAL and connectivity by public transport generally.</p>	Noted, however PTAL stands for Public Transport Accessibility Levels. References to accessibility therefore cannot be avoided.
General and specific consultation bodies		TFL Spatial Planning	Creating well designed, well connected, inclusive places	D	<p>Cycle parking: we suggest incorporating policies that address private cycle hire schemes. These are becoming increasingly prevalent for certain types of development (e.g. student accommodation, shared offices etc.). We are supportive of policies that encourage private cycle hire schemes, although it does not replace private cycle parking in accordance with the London Plan and the LCDS.</p>	Noted. A paragraph has been added to D.3.6 to acknowledge that "The Royal Borough is supportive of policies that encourage private cycle hire schemes, although this does not replace private cycle parking in accordance with the London Plan and London Cycling Design Standards".
General and specific consultation bodies		TFL Spatial Planning	Creating well designed, well connected, inclusive places	D	<p>D.99: TFL supports this policy in principle, but it should also be noted that stacked cycle parking, while permissible on constrained sites and for larger residential schemes, should be limited given accessibility concerns. We suggest encouraging developments to provide no more than 80% of long-stay residential spaces in two-tier racks.</p>	Noted. A paragraph has been added to D.99 stating that "Developments are encouraged to provide not more than 80% of long-stay residential spaces in two-tier racks".
General and specific consultation bodies		TFL Spatial Planning	Creating well designed, well connected, inclusive places	D	<p>Street furniture: reference should be made to short-stay cycle parking forming an integral part of the street furniture, particularly in commercial areas. Where possible, locating this on the carriageway rather than the footway is preferred.</p>	Noted. A paragraph has been added, stating that "appropriate short-stay cycle parking should be considered, including in commercial areas".

General and specific consultation bodies		TFL Spatial Planning	<i>Making better use of land and buildings</i>	B	B.12: this section should be updated to indicate that Elizabeth line stations have now been delivered.	Noted. Paragraph b.12 has been updated to indicate the Elizabeth Line stations have now been delivered.
General and specific consultation bodies		TFL Spatial Planning	<i>Creating well designed, well connected, inclusive places</i>	D	D.100: reference to outdoor cycle storage should emphasise that where this is provided, it must still accord with the LCDS, including ensuring spaces are secure and weather-protected.	Noted. Paragraph D .100 has been refined as follows: "If indoor provision cannot be provided, outdoor, ground level cycle shelters can be considered, if adequately secure and weather-protected, in line with London Cycling Design Standards (LCDS). In new development this should be designed to relate to the architectural language of the development and should not be a generic storage product".
General and specific consultation bodies		TFL Spatial Planning	<i>Making better use of land and buildings</i>	B	B.22: there is a typo in Greenwich town centre being identified as in the east, despite being near the western extreme of the borough.	Noted. Text has been corrected accordingly.
General and specific consultation bodies		TFL Spatial Planning	<i>Making better use of land and buildings</i>	B	B.14: the text that suggests that residents 'must be reliant on private car use' should be reworded. While it is correct to note that many parts of RBG are car-oriented, it does not follow that it 'must' be so as this sentence implies, and there should be an ambition to improve conditions for sustainable travel.	Noted. Text of paragraph b.14 has been reworded as follows: "Public Transport Accessibility Level (PTAL) scores show that there is a wide disparity of levels of access to public transport across the borough; Woolwich has become one of the best connected places in London, while other areas in the borough lack connectivity and mean residents still tend to rely on private car use".
General and specific consultation bodies		TFL Spatial Planning	<i>Creating well designed, well connected, inclusive places</i>	D	Principle D.3.4: more emphasis should be placed on ensuring that delivery/servicing activity does not negatively impact on people walking and cycling, including their safety. Reference should be made to the Healthy Streets Approach and Vision Zero objectives.	Noted. The following point in D.3.4 has been revised as follows: "Servicing/delivery strategies for new and especially large developments should be well integrated with and not detract from the quality of a development or street scene. They should avoid any negative impact on people walking and cycling, including their safety". A "Further Guidance" box has been added to the text, including references to TFL's "Healthy Streets for London" and "Vision Zero for London".
General and specific consultation bodies		TFL Spatial Planning	<i>Making better use of land and buildings</i>	B	Principle B.4: regarding cycle storage, reference should be made to LCDS requirements. A few of these points are not entirely consistent with the LCDS and the London Plan. High-quality cycle storage should be provided for all developments, not just those outside of a 10-minute walking radius from a local centre. At-grade cycle storage, while often a good solution from an accessibility perspective, is also not necessarily the best choice for all developments, particularly where providing cycle parking in, for example, a basement level can facilitate more active uses on the ground floor.	Principle B.4 has been revised as follows: "Residential development should facilitate and encourage cycling through safe and accessible cycle storage for all residents in close proximity to residential cores or front doors".
General and specific consultation bodies		TFL Spatial Planning	<i>Creating well designed, well connected, inclusive places</i>	D	Principle D.2.1: these principles are supported from a transport perspective. Further emphasis could be placed on providing active ground floor uses to achieve more pleasant walking environments. Reference should be made to the Healthy Streets Approach.	Principle D.2.1 has been revised as follows: "Buildings should follow and reinforce the street pattern, be oriented towards and overlook the public realm, be accessible from the public streetscape, and wrap corners. They should optimise active ground floor uses to achieve more pleasant walking environments. Within coherent and historic areas, the established existing building line should usually be followed. Internal open spaces should be considered for the amenity of residents".
General and specific consultation bodies		TFL Spatial Planning	<i>Creating well designed, well connected, inclusive places</i>	D	Principle D.2.3: the point on parking should make it clear that car-free development should be the starting point for all development, in accordance with the London Plan, and should be the rule on all areas with PTAL 4-6.	The following paragraph has been added to the last point in Principle D.2.3: " Where off-street parking is provided, provision should be facilitated either independently on each lot, or alternatively arranged separately, for example in a mobility hub, to avoid constraining the independence of development by a large shared parking structure". It is not considered necessary to repeat London Plan policy.
General and specific consultation bodies		TFL Spatial Planning	<i>Creating well designed, well connected, inclusive places</i>	D	D.105: we are concerned that an excessive amount of design requirements for front garden cycle storage will result in it becoming unfeasible to provide an adequate amount of LCDS-compliant cycle parking on constrained sites or result in less than desirable parking arrangements (e.g. rear garden cycle enclosures that necessitate access through habitable rooms). This in turn jeopardises the delivery of small-scale housing intensification. Tfl is supportive of design guidance that enables a pleasant streetscape in line with the Healthy Streets Approach and encourage streamlining these requirements and incorporating sufficient flexibility to account for highly constrained sites.	The SPD is guidance, not policy. It encourages best practice solutions but it does not exclude alternative approaches on specific, problematic situations. Accordingly, paragraph d.105 uses the term "should" instead of "must" in regards to the cycle sheds being effectively integrated in the street scene.
General and specific consultation bodies		TFL Spatial Planning	<i>Creating well designed, well connected, inclusive places</i>	D	D.77: in reference to car-sharing/car clubs, it should be noted that these are not necessarily an unmitigated good, particularly in well-connected areas where they might serve to encourage trips being made by car that would otherwise be made by sustainable means. Instead, car clubs should be encouraged only in developments where it can be demonstrated that they will lead to a reduction in vehicle trips and more households being able to live car-free. Parking spaces for car club vehicles should also be accompanied by reduced general parking provision (for example, replacing multiple general parking spaces with one car club space and using the freed up space for other uses such as green infrastructure, cycle parking or improved public realm).	The SPD is in line with the current RBG Core Strategy - Policy IM(c) Parking Standards, which affirms: "The Royal Borough will also strongly encourage contributions to car clubs and pool car schemes in place of private parking in new developments across Royal Greenwich". Car clubs are recognised as a tool to encourage residents to move away from individual car ownership as part of their travel plan. They also create benefits for the wider community, not only the development.
General and specific consultation bodies		TFL Spatial Planning	<i>Creating well designed, well connected, inclusive places</i>	E	Only one reference is made to low traffic neighbourhoods (LTNs) in the document. This idea and other traffic reduction strategies should be further integrated into the SPD, particularly in Section E Streets and Spaces, where they can serve as important implementation tools of the various streetscape principles within. Similarly, the document should incorporate references to Vision Zero and Healthy Streets throughout.	The SPD should avoid as much as possible repetition of other Royal Greenwich or London Plan policies and guidance. The Council's new Transport Strategy already provides guidance on the point raised.
General and specific consultation bodies		TFL Spatial Planning	<i>Creating well designed, well connected, inclusive places</i>	D	D.86: reference could be made here to the establishment of CPZs and securing s106 funding for such, commensurate with a development's impact. In accordance with the London Plan, increased parking pressure should not be used as a reason to refuse development, especially where this can be addressed by introducing parking controls.	There is no suggestion in the SPD that increased parking pressure would necessarily result in refusal of planning permission. A reference to London Plan Policy T6 - Car parking has been included in d.87 to clarify this point.

General and specific consultation bodies		TFL Spatial Planning	<i>Making better use of land and buildings</i>	B	Principle B.4: it would be good to tie this to developer contributions including s106, and requirements such as Active Travel Zone Assessments and Residential Travel Plans.	This SPD is guidance only, not policy. It can't enforce contributions like by Section 106. A reference to the London Plan has been added, specifically Policy T2 - Healthy Streets and Policy T4 Assessing and mitigating transport impacts, which make reference to travel plans and TFL guidance.
General and specific consultation bodies		TFL Urban Design	<i>Making better use of land and buildings</i>	B	In general, the SPD undoubtedly has a strong aspiration for housing intensification. It could perhaps benefit from including a summary transport strategy up-front to describe how streets and movement would support the increase in population and social amenities.	A summary transport strategy exceeds the scope of the SPD. The Council's new Transport Strategy was adopted in November 2022, which has been referenced across the document.
General and specific consultation bodies		TFL Urban Design	<i>Creating well designed, well connected, inclusive places</i>	D	Regarding placemaking, we strongly believe that in Section D.1, there should be a focus on developing a hierarchy of users of the public realm, prioritising pedestrians, cyclists, families and children. This could be achieved by adopting urban design principles that consider: - Pedestrian desire lines and comfort - Wayfinding and legibility - Diversity and inclusion in public spaces - Public spaces with appropriate landscaping for the context - Edge conditions and interfaces between various land uses/activities - Heritage and local identity	Noted. Paragraph d.20 has been added to Chapter D to address the point raised. Further detailed guidance is provided by the Royal Greenwich Transport Strategy, which has been recently adopted. The strategy includes a range of measures to help encourage walking, cycling and public transport, reduce traffic, improve air quality, and support the rollout of ultra-low emission vehicles. These measures will help to make Royal Greenwich a cleaner, greener, safer and healthier borough.
General and specific consultation bodies		TFL Urban Design	<i>Creating well designed, well connected, inclusive places</i>	D	The proposed Principal Street Types in Section E.3.1 should more clearly state how they can create a safe and vibrant public realm. - Type A should also address how it accommodate buses and interfaces with other street amenities such as bus stops, crossings, and pavements, given the recommended dimension (minimum) for the carriageway is less than 6m. TFL normally requires at least 6.4m for safe two-way bus operation. - The proposed shared space in Type C appears heavily dominated by motor vehicle movement, and could potentially be unwelcoming for walking and cycling. National Design Guidance and Inclusive Design Principles should be adopted to prioritise pedestrian and cycle movements; ensure well-designed spaces area safe for all users and provide opportunities for formal and informal play where possible	Noted. The minimum width of type A has been increased to 6.4m. Guidance and diagrams for Type C has been revised more in line with the National Design Guide.
General and specific consultation bodies		TFL Urban Design	<i>Creating well designed, well connected, inclusive places</i>	D	In Section D.3.5, we are concerned about the suggested approach for multi-storey car parks in Figures d.21 & d.22. This is very unlikely to be the optimum arrangement for car parking other than in very specific conditions. to align better with the Mayor's Transport Strategy and Healthy Street Principles, we recommend that more street-based parking layout options are included, showing how smaller parking areas, sensitively designed as part of the public realm, can avoid a negative impact on placemaking, pedestrian experience and public safety.	The caption under figure d21 has been refined to explain that this apply to exceptional cases only. Regarding on-street car parking, further reference to relevant guidance, including Manual for Streets 2, has been included.
General and specific consultation bodies		TFL Urban Design	<i>Making better use of land and buildings</i>	C	The intensification approaches for the corridors in Section C.2.2 could be a positive idea. However, this requires further exploration and dialogue with TFL as it involves TLRN. Any long-term vision and aspect should be in line with MTS aspirations. It is currently unclear how this might support TFL's wider vision and priorities.	The SPD only provides high-level guidance on the intensification of urban corridors. The Council is considering preparing more detailed Design Codes on the identified type areas including urban corridors. At that stage there will be the opportunity to discuss all issues more in detail with TFL.
General and specific consultation bodies		Thames Water	<i>Making better use of land and buildings</i>	F	It is considered that there would be benefits to referencing the discounts offered by Thames Water for for new development that is water efficient in the SPD to help encourage water efficiency in new development. https://www.thameswater.co.uk/developers/charges .	A paragraph has been added to Section F1, including a link to Thames Water website and a reference to their discounts for water efficient schemes.
General and specific consultation bodies		Thames Water	<i>Creating more sustainable, biodiverse places</i>	F	To ensure implementation of the 'Optional Requirement' in Building Regulations in relation to water efficiency, a planning condition should be attached specifying this requirement on all residential permissions. Such conditions should specify that the fittings approach should be used for calculating water efficiency of new development to ensure full compliance with London Plan Policy S15 and the supporting text in section 9.5.2. It is considered that there would be benefit in clearly setting out this requirement in the SPD.	Noted. A paragraph has been added to Chapter F1 - Sustainable Buildings, specifying that in order to ensure that leakage is reduced and water used as efficiently as possible, the fittings approach should be used for calculating water efficiency of new development in line with The Optional Requirement set out in Part G of the Building Regulations and in compliance with London Plan Policy S1.5 - Water Infrastructure and the supporting text in section 9.5.2.
General and specific consultation bodies		Thames Water	<i>Enabling good quality household extensions</i>	I	Basement Development Section I.3.7 relates to basement development. Basement development by its subterranean nature is at an increased risk of sewer flooding. Where new basement development will be connected to the sewer network, in order to mitigate the risks of sewer flooding, it is considered that development should be fitted with positive pumped devices to seek to protect basements from surcharging of sewers and prevent basements from flooding from internally generated flows which could arise where sewers are surcharging but properties are protected by a non-return valve only. It is recommended that text is added to confirm that new basement development will be conditioned to ensure it is protected from sewer flooding through the fitting of a positive pumped device.	The SPD can only provide guidance which supports the existing policies within Local Plan, it cannot introduce new policies, including regarding planning conditions. The council is in the process of developing a new Local Plan. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.

Amenity Group/ Residents Association		The Blackheath Society	<i>Creating more sustainable, biodiverse places</i>	E	<p>E 4.3 We consider that clear emphasis needs to be given to preserving mature trees...</p> <p>E 4.3 Tree Planting: We welcome the intent behind the requirement to replant using 10 year old trees 'to ensure equivalent carbon capture' for trees that have been felled (E4.3 p169). However, choosing an arbitrary age for the replant trees may not be the best way forward. In particular, most commercially available trees are sold by height or size of container but not by age.</p> <p>We also note that Principle I 2.5, p255, says 'If any trees are to be felled, two young trees should be planted to replace habitat loss'. This may give the very misleading impression that this replaces the lost carbon capture. . A 10 year old tree is no replacement for a semi mature, large broad leaved specimen and will not be so for many, many years. This should be made clear as such mature tree loss decisions are evaluated.</p> <p>inciple E4.3 p169 and also Principle I 2.5 p255. We note the prioritisation of native species. We are concerned however about how narrow a range of trees this might actually be, depending on the definition of 'native'.</p> <p>Maintenance plans must be a requirement for tree planting / replacements otherwise it will not matter if the trees are longer-lived species or not. Principles E3.5, p157,E4.3, p169, E6 p171 and I2.5, p255, need amending to make this clear.</p> <p>Much that is said about street and public realm trees is sensible but we see no reason whythese requirements are confined to street trees. There is a missed opportunity to require developers to provide a suitable number of trees in every private garden on the development. see also G2.5.</p>	<p>In response to different comments received regarding trees, Principle E.4.3 has been revised as follows: "All developments should seek to retain existing trees and enhance their local existing ecosystem. If trees must be felled, at least 10-year-old replacement trees should be planted to ensure equivalent carbon capture capacity. The option of planting younger trees is acceptable only where these are proved to be advantageous in terms of enabling a greater amount of carbon capture through rapid growth and also ensuring greater resilience and longevity of the new green infrastructure. If younger trees are planted and subsequently die, these should be replaced to ensure the carbon savings are achieved. Attrition rates should be factored into the planting regime at inception to avoid the requirement for replacements".</p> <p>The SPD does not exclude trees other than native species. Best planting practices require a "right species in the right location" approach and in many cases this will be native species. However, consideration must be given to ecological resilience and a changing climate, where non-native species may positively contribute to biodiversity and ensure long-term ecological establishment. A blanket ban on non-native species would therefore be too restrictive in this regard. Fundamentally, each planting regime must consider species suitability on a per case basis.</p> <p>Principle E.3.5 is clear about the importance of retaining existing trees as much as possible to shape the form of new development. The development of the new Royal Greenwich Local Plan will provide the opportunity to address this issue more in detail.</p>
Amenity Group/ Residents Association		The Blackheath Society	<i>Enabling good quality household extensions</i>	I	<p>General : Delivery</p> <p>We believe a commitment to delivery of the ambitions in the document is important. In this connection, we welcome the inclusion in the document of a section on Validation Requirements, Section I.4.2 page 280. However, these are incomplete and need amplification e.g. missing references to Heritage Impact Assessments. The Council also needs to ensure that the validation requirements are strictly adhered to and that documents provided are fit for purpose when posted on the portal e.g. Design and Access Statements.</p> <p>We would like to see in this section of the document a clear commitment to enforcement.</p>	Noted and amended.
Amenity Group/ Residents Association		The Blackheath Society	<i>Creating well designed, well connected, inclusive places</i>	E	<p>Play Space</p> <p>E 4.2 We believe there should be a clear guideline that every child in Greenwich should have access to a playspace with a defined (small, walkable) distance .</p>	<p>Noted. A paragraph has been added to e.84: "e.84 Children's play areas and equipment should normally be provided as part of new residential developments of 50 dwellings and above and on smaller developments when there are no existing nearby facilities. Design should actively deliver places for young people to gather and partake in age appropriate activities in sheltered areas with passive surveillance.</p> <p><i>The aim is to provide every child in Royal Greenwich with easy access to high quality play space, in line with the GLA policies and guidance on quality and walkable distance from home</i>".</p>
Amenity Group/ Residents Association		The Blackheath Society	<i>Creating well designed, well connected, inclusive places</i>	C	<p>Section C</p> <p>. The key accompanying the diagram at Figure c.6 is misleading in that it does not correctly identify vacant land;</p>	Noted. Figure C.6 has been amended in line with comment.
Amenity Group/ Residents Association		The Blackheath Society	<i>Making better use of land and buildings</i>	C	<p>In the case of the Kidbrooke Strategic Development Area, the Objectives (c.29) states that the area 'should develop into a place with its own character', however this negates the importance of its proximity and adjacency to areas with established characters, including Conservation Areas.</p>	Noted. Paragraph c.29 has been revised as follows: "Any new large scale development site coming forward in The Royal Borough of Greenwich should be comprehensively developed with a mix and density of uses appropriate for the context and character of its location and its accessibility to public transport and local facilities. It should develop into a place with a strong character and a distinct identity of its own, <i>while creating a legible transition with the surrounding context, including areas with strong, established character such as conservation areas</i> ".
Amenity Group/ Residents Association		The Blackheath Society	<i>Enabling good quality household extensions</i>	I	<p>There is no Section J, as referenced in the document. For example: Permitted Development p 246 section I 1.1 refers to permitted development in Conservation Areas mentioningsection J2.</p>	Noted. The references to section J have been removed.
Amenity Group/ Residents Association		The Blackheath Society	<i>Making better use of land and buildings</i>	A	<p>Section A : Development : The Process</p> <ul style="list-style-type: none"> • Pages A6/A7 the flow chart in A6 and the text in A7 do not match; • Point A7 P30 for larger developments: we would like to see a requirement to consult prior to submission. 	Paragraph a.30 has been revised as follows, to be more coherent with flow chart on A6:"The Council strongly encourages all applicants and their agents to meet with their neighbours at an early stage of the design process and to consult them before they submit a planning application".
Amenity Group/ Residents Association		The Blackheath Society	<i>Creating more sustainable, biodiverse places</i>	B	<p>We consider that an overarching message of the SPD in B11 must be that any developmentis an opportunity to increase tree cover and biodiversity and must be judged on the extent to which that is achieved. Where it does not then it must not proceed.</p> <p>We believe that RBG has an opportunity to enhance its green credentials by committing to the requirements of the 2021 Environmental Act which aims to produce a 10% net gain (see B 11 b68).</p>	<p>Paragraph b.68 has been revised to acknowledge that the new legal requirement for a Biodiversity Net Gain (BNG) of 10% will come into force in November 2023.</p> <p>The council is in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030.</p> <p>The council has also recently commissioned a Towards Net Zero Carbon Study along with 17 other boroughs which will be used as an evidence base to develop policies in the new Royal Greenwich Local Plan. The study includes the use of air source heat pumps in meeting the net zero standards in the London Plan.</p>

Amenity Group/ Residents Association	The Blackheath Society	<i>Making better use of land and buildings</i>	B	Sections A and B : Conservation and Heritage We feel that a commitment to Greenwich's unique heritage should be strengthened in this document. Principle B.7 first paragraph (see also above under Page A.5.1): The impact of development on the setting of heritage assets must also be considered.	SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. It is not the intention of the SPD to cover all possible planning issues and it is focussed on urban design. SPDs cannot form new, enforceable policies. They are however a material consideration in decision-making.
Amenity Group/ Residents Association	The Blackheath Society	<i>Creating well designed, well connected, inclusive places</i>	E	General: Ambition We would like all requirements to be set out in the strongest possible language. The choice of 'must' or 'should' appears to be arbitrary. For instance p157 there is an incidence of 'must' rather than should contained in the principle E3.5 box. Our preference is to see 'must' used throughout rather than should.	SPDs are non-statutory documents which are linked to, and provide further guidance on, policies contained within the Royal Borough's Local Plan and the London Plan. SPDs cannot form new, enforceable policies. They are however a material consideration in decision-making. The language in the SPD is tailored to its role of providing guidance rather than prescriptive policy.
Amenity Group/ Residents Association	The Blackheath Society	<i>Creating well designed, well connected, inclusive places</i>	C	The boundary shown around the Kidbrooke Strategic Development Area requires reconsideration or justification as it includes within its boundary areas of Metropolitan Open Land and school playing fields, neither of which in policy terms is appropriate for development or intensification... The diagram and the accompanying text is misleading by omitting to show or explain that much of the land within the Kidbrooke Strategic Development Area is already the subject of existing planning permissions or is already under construction. A much clearer position must be set out for this and the other Strategic Development Areas, with more detailed diagrams that accurately reflect the present baseline position;	The boundary of the Kidbrooke Strategic Development Area shown in the SPD is in line with that shown in the Royal Greenwich Core Strategy Policies Map. The Policies Map cannot be amended by an SPD but only through the Local Plan process. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period
Amenity Group/ Residents Association	The Blackheath Society	<i>Creating more sustainable, biodiverse places</i>	B	Sustainability, Energy and Retrofit : Sections B and I We note and strongly support the Retrofit First principle set out at Principle B15. We believe that this must include the need to undertake a carbon use comparison between renovating existing buildings and demolishing them and rebuilding. This would make explicit the carbon cost of demolition and rebuild. We welcome the reference to carbon reduction also for household extensions, ref I 2.6 page 257. We would like to see a clear specification that plans to address these must be included in applications, presumably via the Validation List. We understand that currently only developments bigger than 12 units are required to offer Energy Plans. We would like to see this applied to all developments	The council is in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030. The council has also recently commissioned a Towards Net Zero Carbon Study along with 17 other boroughs which will be used as an evidence base to develop policies in the new Royal Greenwich Local Plan. The study includes the use of air source heat pumps in meeting the net zero standards in the London Plan.
Amenity Group/ Residents Association	The Blackheath Society	<i>Enabling good quality household extensions</i>	I	Basements I.3.4 We would like to see inclusion of the proposed method for disposal of spoil.	The council is in the process of producing a Climate Resilience SPD which will be used to provide guidance on how new development in Royal Greenwich should be designed and built so that it has a positive impact on the environment and achieves the highest standards of sustainable design and construction, including regarding basements and disposal of spoil. The SPD will support the delivery of Greenwich's Carbon Neutral Plan in line with the commitment to achieve Net Zero Carbon by 2030.
Amenity Group/ Residents Association	The Blackheath Society	<i>Creating more sustainable, biodiverse places</i>		Resilience, Trees and Biodiversity : Sections B, E and I We note that figure b15 gives an indication of tree cover within the Borough. We believe the opportunity should be taken to commit to increase tree cover with a defined target percentage within Principle B 10	The SPD is guidance only, not policy. The point raised about tree cover can be addressed through the new Royal Greenwich Local Plan. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Amenity Group/ Residents Association	The Blackheath Society	<i>Creating more sustainable, biodiverse places</i>	I	We would have liked to see a requirement that any new build, including extensions, must incorporate 'swift bricks', 'bat bricks' and 'sparrow bricks' to provide nesting sites rather than the 'encouragement' provided in I 40, p255.	The SPD provides guidance only, not policy. However pa. i46 specifies that "The use of materials such as bee, bird and bat bricks is strongly encouraged in any new extensions or home improvements, as they help to increase biodiversity within the building fabric."
Amenity Group/ Residents Association	The Blackheath Society	<i>Creating well designed, well connected, inclusive places</i>	C	Section C : Intensification We were surprised to find the aspect of preserving heritage missing from the section on Intensification, e.g. page 57 C Intensification, and more generally in this section. We would like to see more guidance on how heritage aspects are to be covered in areas outside the conservation areas but which border conservation areas, and where inappropriate development can have a significant impact on the conservation area. We would like to see a section on Important Local Views in Greenwich, which would highlight which views in the Borough need to be preserved as being key to maintaining its character.	The SPD provides high-level guidance on many topics regarding urban design. For further detail on conservation and heritage related issues, the conservation area appraisals and the development of the new Royal Greenwich local plan will provide more detailed guidance and policy. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.
Amenity Group/ Residents Association	The Blackheath Society	<i>Making better use of land and buildings</i>	B	B2 Strategic Considerations : Consultation and The Role of Developers B2 commendably puts community engagement high on the list. The activities and commitment of developers is an important element here. Apart from the guidelines on plans submitted, we would like to see a clear requirement for developers (at all levels) to engage continuously with local communities and neighbours on their plans for construction. The construction phase is also important in this, particularly as more brownfield and complex sites are developed (This issue of engagement and communication could also be included in Section G : Residential Amenity and Well Being)	This SPD focuses on urban design principles. This issue exceeds its scope. The Council is revising its Statement of Community Involvement and preparing separate guidance for developers on community engagement. This will be subject to public consultation in early Autumn 2023 and we welcome input from all stakeholders.

Amenity Group/ Residents Association		The Lane Residents Society Ltd	<i>Making better use of land and buildings</i>	C	P57 C: We consider that it is vitally important to protect Greenwich's heritage assets and conservation areas. We are therefore surprised that the Design Principles set out on this page make no mention of heritage assets and conservation areas. An appropriate addition should be made.	While dealing with intensification of the identified area-types, Chapter C has a focus on retrofit and conservation. For example, at page 73, regarding urban corridors in sub-urban areas, the SDP affirms that "demolition of existing buildings should only be undertaken when they are clearly preferable in design and conservation terms to other forms of interventions, such as retrofit, adaptation and extensions, and where they reinforce or enhance the existing or emerging character of the corridor".
Amenity Group/ Residents Association		The Lane Residents Society Ltd	<i>Making better use of land and buildings</i>	B	2. Although it is difficult to do from the small maps shown on Page 39, under B.6, we are surprised to find that the Cator Estate and therefore The Lane are classified as 'Sensitive to Change' rather than 'Highly Sensitive to Change'. Given its special characteristics and importance to the Blackheath Park conservation area we would think that it goes without saying that the Cator Estate should be classed as 'Highly Sensitive to Change'. When you look at The Lane in particular this is even more so... The Lane is a locally listed private self-managed Span estate of 39 houses with covenants in place to ensure an exceptional level of a consistent set of character features which offer a strong level of distinctiveness. It is now a classic of mid-century modern of the early 1960s... we strongly urge that the Cator Estate and more particularly The Lane, be designated as 'Highly Sensitive to Change'.	The map at page 39 has been slightly revised to communicate more clearly the sensitivity to change of The Lane.
Agent representing Business/Land owner		Transport Trading Limited Properties (TTLP)	<i>Creating well designed, well connected, inclusive places</i>	D	Transport and access Much more emphasis should be placed on car-free development throughout the access and transport-related sections of the document. For instance, the vehicular parking section makes many references to innovating parking solutions from multi-storey car parks to automated vehicle stackers, but none of these are a substitute for ensuring that car parking provision in general is minimised to the greatest extent possible.	Paragraph d.76 states that "In the Royal Borough there is an aspiration for car-free development, a general intent to control and limit parking requirements across new developments and to invest in good design that incentivises active travel". It also acknowledges that "...The London Plan 2021 and Royal Borough of Greenwich policies both control the amount of parking for developments based on the assessment of needs. These policy documents should both be referred to for guidance on parking standards". The SPD can only provide guidance which supports the existing policies within Local Plan, it cannot introduce new policies. The council is in the process of developing new Local Plan. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period
Agent representing Business/Land owner		Transport Trading Limited Properties (TTLP)	<i>Creating well designed, well connected, inclusive places</i>	F	F.3 Tall and Large Buildings f.14 "In the Royal Borough generally a building is considered a 'tall building' when it is 2x the prevailing building height of its context or taller, or above 30m. Tall buildings are exceptional forms of development and only acceptable in specific locations". In accordance with London Plan Policy D9 Part A, Greenwich's tall building definition should be reviewed as part of a DPD process to clarify that tall buildings should be no less than 6 storeys, or 18 meters measured from ground to the floor level of the uppermost storey.	Paragraph f.14 has been revised as follows: "Coherently with the London Plan Policy D9, a tall building in Royal Greenwich is defined as a building not less than 6 storeys or 18 metres in height measured from ground to the floor level of the uppermost storey, which is twice or more the prevalent height in its surrounding context".
Agent representing Business/Land owner		Transport Trading Limited Properties (TTLP)	<i>Creating well designed, well connected, inclusive places</i>	F	The following statements are too prescriptive, and heights should be tested via a design-led approach which is sensitive to the existing local context (heritage, etc.) as well as the area's wider context for change in accordance with London Plan Policy D3 (Optimising site capacity through a design-led approach). Proposed changes: F.2 Building heights f.10 In areas that have an established valued and coherent character and that are sensitive to change, heights of new development would generally be expected to be contextual, that is being of the same height (in terms of their actual height in meters—not storeys) than their surrounding context. f.11 In areas that are less sensitive to change and where there is a greater variation in heights, the response by development needs to reflect the wider context for change in an area, which could mean that a proportionate increase in height may be acceptable (not normally more than one or two storeys above the contextual height).	Paragraphs f.10 and f.11 establish general principles and starting points for a development's suitable response to the surrounding context. This does not preclude that buildings exceeding these expectations can be acceptable if adequately justified in design and conservation terms.
Agent representing Business/Land owner		Transport Trading Limited Properties (TTLP)	<i>Creating well designed, well connected, inclusive places</i>	F	PRINCIPLE F.2: AN APPROPRIATE HEIGHT APPROACH TO THEIR LOCALITY Where a street or area is characterised by a relatively coherent approach to development scale, form and streetscape, new development will be expected to correspond to consider existing shoulder, parapet or roof heights	Principle F.2 has been rephrased as "new development will be expected to be coherent and well-integrated with existing shoulder, parapet and roof heights".
Agent representing Business/Land owner		Transport Trading Limited Properties (TTLP)	<i>Creating well designed, well connected, inclusive places</i>	F	Approaches to height may vary slightly (normally by not more than one floor) to express important building corners at nodes or intersections where this could help the distinctiveness and legibility of an area and where this is justified in relation to the specific site context... TTLP suggests removing this as it is too prescriptive and/or suggests that the highlighted (underlined) text is replaced with the following: ... (by one or more floors) to better mark important building corners.	Principle F.2 has been slightly revised as follows : "Approaches to height may vary slightly (normally by not more than one-two floors) to express important building corners at nodes or intersections where this could help the distinctiveness and legibility of an area and where this is justified in relation to the specific site context ."

Agent representing Business/Land owner		Transport Trading Limited Properties (TTLP)	Making better use of land and buildings	C	<p>...TTLP would also like to put forward the Tfl land to the east of Woolwich Arsenal DLR station as an area which should also be marked as having potential for transformation and intensification. (please see attached plan). Given the site's location above and adjacent to a railway station in an area of high public transport accessibility, the optimisation of residential development on this site would be in line with London Plan policies H1 and D1. It would also reflect the planning history of the site. In 2010 the RB Greenwich approved an application 10/2612/F for "a building of up to 16 floors consisting of a residential building of 51 dwellings and a hotel building of 96 bedrooms and 364sqm of shop floor space" on the site. Although this wasn't built out, Tfl is keen to work with the borough to explore bringing forward development of a similar scale in the near future."</p>	The information included from the CSTBA is mainly to facilitate the explanation of the design-process/methodology in the SPD, which starts from a comprehensive analysis and understanding of a development site's context. The map at page 59, named "Principal typological areas with potential for intensification" only wants to illustrate the main classification of typological areas in the borough to facilitate the different intensification-approaches suitable to them. It is based on a high level assessment of the whole borough and focuses on wide areas more than individual sites. Further detail on development sites will be provided in the new Royal Greenwich Local Plan, which will include site allocations. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period
Agent representing Business/Land owner	Savills	Tribe (Ravensbourne Wharf site)	Creating well designed, well connected, inclusive places	F	<p>Draft Urban Design Guide Supplementary Planning Document</p> <p>As it relates to the draft UDG, the suggested changed described and illustrated above, should also be carried over, including:</p> <ul style="list-style-type: none"> Figure f.4 (p178) currently indicates a Tall Building Cluster (CL) in Creekside. This figure should be updated to include a new CL1.3 as per the above. 	It is considered that the cluster around Adagio Point should not be further extended, Therefore it is not included in the Tall Buildings recommendations map at page 178. This said, to avoid any misleading perception that the SPD would form new policy in contradiction to the current RBG Core Strategy and in advance of the new Royal Greenwich Local Plan, the Tall Buildings Recommendation Map at page 178 has been removed and replaced with a set of design principles, more in line with the spirit and intent of the SPD.
Agent representing Business/Land owner	Savills	Tribe (Ravensbourne Wharf site)	Characterisation Study, Tall Buildings Assessment and Heritage Appendix		<p>As it relates to Table 8.1 (p112), first row (Code AS1.1), sixth column (Recommendations):</p> <ul style="list-style-type: none"> Delete the following text: "Existing / permitted cluster around Adagio Point / permitted Creekside Village East towers, should not be extended further to avoid further eroding the ensemble and low rise and natural setting of Maritime Greenwich, the Park and Greenwich town centre." Add the following text:"Existing / permitted cluster around Adagio Point / permitted Creekside Village East towers, to be identified to reflect the existing and emerging tall building cluster of buildings of up to 86.5m AOD (with reference to planning permission reference 18/4530/F), to be justified through detailed planning application assessments in order to ensure the ensemble and low rise and natural setting of Maritime Greenwich, the Park and Greenwich town centre is not adversely impacted." 	The Tall Building Assessment is an evidence base document, which will be used in the development of policies in the new Royal Greenwich Local Plan. This said, the text of recommendation AS1.1 in the Tall Building Assessment has been revised to clarify that the existing/permitted cluster around Adagio/Point, <u>also including the Ravensbourne Wharf site, recently granted planning approval for a 27 storey building</u> , should not be extended further to avoid further eroding the ensemble and low rise and natural setting of Maritime Greenwich, the Park and Greenwich town centre."
Agent representing Business/Land owner	Savills	Tribe (Ravensbourne Wharf site)	Creating well designed, well connected, inclusive places	F	<p>...Adopted Core Strategy Policy DH2 sets out that tall buildings may be appropriate in East Creekside and that detailed consideration must be had of the impact of tall buildings given proximity to designated listed buildings...</p> <p>Characterisation Study – Tall Buildings Assessment (March 2023)</p> <p>As it relates to the above document, Figure 3.7 (and Figure 3.8) titled "Existing and proposed buildings above 10 storeys..." do not reference the Existing Permission for Ravensbourne nor the nearby Saxon Wharf tall building planning permission, also on Norman Road...</p> <p>...In the context of East Creekside and this part of the Greenwich Town Centre, we therefore consider that this important existing context should be reflected in the evidence base and analysis given that there has been robust and detailed evidence to support and justify tall buildings in East Creekside. Indeed, the evidence base would further support this given that there are no constraints or sensitivities shown on Figures 5.1, 5.2, 5.4, 5.6, 5.7, 5.8, 5.9 and 5.10.</p> <p>As it relates to Table 8.1 (p112), first row (Code AS1.1), among other text, we note the recommendation states the following: "Existing / permitted cluster around Adagio Point / permitted Creekside Village East towers, should not be extended further to avoid further eroding the ensemble and low rise and natural setting of Maritime Greenwich, the Park and Greenwich town centre."</p> <p>However, this has neglected to take into account the Ravensbourne Wharf Existing Permission. It also does not show the existing 18 storey tall building along Thornham Street.</p> <p>Furthermore, the Planning Board Report (dated 7 January 2020) for the Ravensbourne Wharf Existing Permission acknowledges that it would form part of a cluster of tall buildings.</p>	<p>This issue is due to an error in the preparation of the Tall Building Assessment.</p> <p>The permitted development at Ravensbourne Wharf has been added to Figure 8.1 in the Tall Building Assessment.</p>
Agent representing Business/Land owner	DP9	Watkins Jones (Greenwich Quay site)	Creating well designed, well connected, inclusive places	F	<p>It should be noted that the Tall Buildings Study (2021) does not form part of the evidence base for the SPD. We have therefore reviewed the Tall Buildings Assessment ("TBA") (2023). This should be clarified in the next version of the SPD.</p>	Noted. This has been corrected to refer to the Tall Buildings Assessment (2023).

Agent representing Business/Land owner	DP9	Watkins Jones (Greenwich Quay site)	Characterisation Study, Tall Buildings Assessment and Heritage Appendix		<p>In terms of public transport accessibility level (PTAL), TfL's WebCAT tool shows the (Greenwich Quay) Site of having a PTAL of 2. WebCAT also shows that, within a close distance of the Site, PTAL of 4-5 is achieved; this is owing to the walk distance thresholds applied within the calculation (960m to tube/rail and 640m to bus stops). As soon as the distance is exceeded these services are discounted from the calculation, however users would still likely walk the additional short distance to access these services...</p> <p>Accordingly, WSP has undertaken a manual PTAL calculation to accurately determine the Site's public transport accessibility level. The results of the manual PTAL calculation indicate that through the delivery of improved accessibility to Creek Road the Site has an accessibility index of 16.85, which equates to a PTAL score of 4 (Good). This evidence therefore confirms that from an accessibility perspective, the Site is suitable for higher density development because it is within 500m walking distance of Cutty Sark DLR station and has a PTAL score of 4. This should be reflected in the SPD. As a minimum the SPD should acknowledge at paragraph B.4 that WebCAT tool's PTAL scores are not always accurate and therefore the Council will be willing to accept site specific clarifications.</p>	Partially in keeping with the raised issue, paragraph B.4 has been revised to acknowledge that WebCAT tool's PTAL scores are not always accurate and therefore the Council will be willing to consider site specific clarifications.
Agent representing Business/Land owner	DP9	Watkins Jones (Greenwich Quay site)	Characterisation Study, Tall Buildings Assessment and Heritage Appendix		<p>Section 6.1 Introduction (of the Tall Buildings Assessment) states that "This chapter presents areas within the borough that by their nature may hold some opportunity for tall building development and present a starting point for identifying appropriate areas for tall buildings". It then states that where designated it does not always mean that a tall building will be an appropriate design response. Conversely, we believe that this section should also conclude that even if an area is not designated then that doesn't mean that cases for taller buildings cannot be successfully made.</p>	The raised point is contradictory to London Plan Policy D9, which specifies that the locations suitable for tall buildings should be identified by the Council's development plan. Policy D9 clause B point 3 states: "Tall buildings should only be developed in locations that are identified as suitable in Development Plans". This is to provide more certainty and clarity to all stakeholders, including developers and local communities, on the outcomes of the planning process.
Agent representing Business/Land owner	DP9	Watkins Jones (Greenwich Quay site)	Characterisation Study, Tall Buildings Assessment and Heritage Appendix		<p>The conclusion of Section 6 of the TBA (Figures 6.7 and 7.7) discounts the entire area of the Borough west of the Creek. This is clearly a flawed conclusion given the number of recent planning applications for tall buildings that have been granted. Many of which have now been built out to form an existing tall building cluster. We believe the 2023 TBA has clearly missed an opportunity to deliver new homes within the Borough – this is clearly demonstrated in Figure 8.1. Figure 8.1 brings together all of the Tall Building Recommendations and Sensitivities for Greenwich. This clearly shows that the Site which sits adjacent to the 'Existing Tall Building Cluster' on Creek Road is not unduly affected by any of the identified sensitivities. The Site should therefore be recognised as having potential for tall buildings both within the TBA as well as the Urban Design Study.</p>	The Tall Buildings Assessment is only an evidence base document. It will be used in the development of policies in the new Royal Greenwich Local Plan. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period. This include comments regarding car parking in residential areas.
Agent representing Business/Land owner	DP9	Watkins Jones (Greenwich Quay site)	Creating well designed, well connected, inclusive places	F	<p>Figure 3.8 (p63) of the TBA shows the Site's locality as an 'Existing Tall Building Cluster'. This should form part of Section 6 of the Tall Building Assessment (2023) as clusters of tall buildings would clearly represent further opportunity.</p>	The Tall Buildings Recommendations map at page 105 of the Tall Buildings Assessment has been revised to include the cluster of buildings including Ravensbourne Wharf. Greenwich Quay sits on a peripheral position in relation to the emerging cluster of all buildings to the immediate south of Creek Road, closer to the mid-low-rise fabric on the northern side of Creek Road and towards the river. While being suitable for buildings mediating between the different scales and grain of the surrounding fabric, at this stage the site does not appear as suitable to be included within the indicative boundary of the emerging cluster of tall buildings to the south of Creek Road.
Amenity Group/ Residents Association		Westcombe Society	Making better use of land and buildings	C	<p>•2.2. Corridors: we have not seen any mention of the Silvertown Tunnel, which will intensify traffic on both motorway grade and urban corridors. TfL's own assessment suggests that traffic flows will increase across the borough. We believe that drivers will seek un-tolled crossings, using urban corridors, and that increased south-bound access to the main motorway grade route will affect junctions such as the Kidbrooke Interchange. We are already seeing intensification of industrial sites based on the perceived utility of the Silvertown Tunnel, with the development of 'last-mile' delivery centres locally. TfL has promised changes to the road layouts, though detailed plans have not appeared for the A102/Woolwich Road flyover or the Kidbrooke interchange, but all these effects should be considered as part of the assessment of urban corridors.</p>	A reference to the Silvertown Tunnel has been added in paragraph c.32. Regarding the potential increase in traffic, RBG new Transport Strategy adopted in November 2022 includes a range of measures to help encourage walking, cycling and public transport, reduce traffic, improve air quality, and support the rollout of ultra-low emission vehicles. These measures will help to make Royal Greenwich a cleaner, greener, safer and healthier borough.
Amenity Group/ Residents Association		Westcombe Society	Making better use of land and buildings	A	<p>•7.a.26. Consultation: we would like to see developers consulting with communities at pre-application stage, rather than only after submission (when plans have become much harder to adjust), with a description of the consultation and any changes made as a result outlined within the application.</p>	Figure a.4 shows that engagement with local communities should happen at the pre-application stage. Paragraphs in section A.7 have been refined to further clarified on this point. In parallel, the Council is developing a developers guidance note together with a new Statement of Community Involvement which will encourage developers to conduct early engagement with the local community and amenity groups for developments over a certain size. We are aiming to consult on the new statement of community engagement and developers guidance note in early Autumn 2023.

Amenity Group/ Residents Association		Westcombe Society	<i>Creating more sustainable, biodiverse places</i>	E	<p>•E.4.3, Designing for Biodiversity: mature trees are a key element of the Westcombe Park Conservation Area, and we try to avoid losing them wherever possible. We would like to see a presumption for retention of mature trees. If a tree must be felled, it should be replaced, but maturity is not necessarily the ideal benchmark. Younger specimens may take hold better in many circumstances, and particularly with street trees where planting holes may be poor and small, and watering and maintenance plans not adhered to. We would like to see better enforcement of planning conditions that call for replacement trees in private gardens.</p>	<p>In response to different comments received regarding trees, Principle E.4.3 has been revised as follows: "All developments should seek to retain existing trees and enhance their local existing ecosystem. If trees must be felled, at least 10-year-old replacement trees should be planted to ensure equivalent carbon capture capacity. The option of planting younger trees is acceptable only where these are proved to be advantageous in terms of enabling a greater amount of carbon capture through rapid growth and also ensuring greater resilience and longevity of the new green infrastructure. If younger trees are planted and subsequently die, these should be replaced to ensure the carbon savings are achieved. Attrition rates should be factored into the planting regime at inception to avoid the requirement for replacements".</p> <p>The SPD does not exclude trees other than native species. Best planting practices require a "right species in the right location" approach and in many cases this will be native species. However, consideration must be given to ecological resilience and a changing climate, where non-native species may positively contribute to biodiversity and ensure long-term ecological establishment. A blanket ban on non-native species would therefore be too restrictive in this regard. Fundamentally, each planting regime must consider species suitability on a per case basis.</p> <p>Principle E.3.5 is clear about the importance of retaining existing trees as much as possible to shape the form of new development. The development of the new Royal Greenwich Local Plan will provide the opportunity to address this issue more in detail.</p>
Amenity Group/ Residents Association		Westcombe Society	<i>Making better use of land and buildings</i>	B	<p>•B.11, Biodiversity. Loss of gardens to hard standing, extensions, decking, and outbuildings contribute to loss of biodiversity and should be minimised or mitigated. This is mentioned elsewhere, but we would like to see this as a principle in this section.</p>	<p>Noted. b.67 has been revised as follows: "Applications for smaller sites, household extensions and shopfronts are encouraged to consider how opportunities for small or micro-scale interventions can be integrated into the design to enhance biodiversity. The extent of outdoor hard-standing and decking areas should be limited to the minimum necessary".</p>
Amenity Group/ Residents Association		Westcombe Society	<i>Making better use of land and buildings</i>	B	<p>•B.4, Creating Walkable Neighbourhoods: the principle of the 15-minute neighbourhood is excellent. We would like to see some acknowledgement, though, that staff for retail and service establishments which form neighbourhoods should be able to reach their place of work within a reasonable time, perhaps 30 minutes, as part of the imperative for housing and tenure diversity in the borough.</p>	<p>Paragraph b.26 has been refined as follows: "Consideration should be given to all stages of the journey and all groups of travellers, to ensure that all barriers to active means of travel are understood and mitigated where possible".</p>
Amenity Group/ Residents Association		Westcombe Society	<i>Creating well designed, well connected, inclusive places</i>	F	<p>•F.2 and F.2-.3, Scale and Massing: We appreciate the fresh thinking on height of developments, in which the relationship with other local buildings becomes the paramount consideration. However, we are concerned about cumulative impacts. If more height is achieved across an area where piecemeal redevelopment is taking place, for example with additional storeys, might that encourage developers to use new heights of buildings as benchmarks? F.2 says 'Scale, massing and height of a building should relate to the local existing or emerging character of the place where it is located'. Here, 'emerging' could thus become the point for developers, rather than the local existing character. We would like this document to set the historical context and existing character as the benchmark. This would be particularly important in the large areas marked as 'Highly Varied' in Figure f.1, p. 176.</p>	<p>Principle F.2 clearly states that "Applicants need to understand and justify their approach to height in response to the existing height context (specific heights of neighbouring and nearby buildings within the adjoining streets and prevailing heights in the wider area) and any relevant plans or guidance that may stipulate the future approach to height in the locality".</p> <p>Principle B.6.2 states that "In areas whose character is more sensitive to change (which includes areas of historic and architectural value (ed.)), development will need to be contextual and respond sensitively to and integrate with the prevailing pattern of development and characteristic features. This should consider aspects of massing, height, built form, articulation, roof form, colours and materials.</p> <p>These principles are strong enough to avoid any undesirable misinterpretation, including regarding emerging local characters.</p>
Amenity Group/ Residents Association		Westcombe Society	<i>Creating more sustainable, biodiverse places</i>	F	<p>•F.1, Sustainable Building: we would like to see included in this section the use of rain water harvesting/grey water treatment systems that separate water from sewage. This would seem a major omission given future expected water shortages. Grey water in large buildings can be treated and reused for toilet flushing, irrigation.</p>	<p>Section F1 - paragraph f.3 has been refined as follows: "Design should incorporate appropriate measures for the efficient and low carbon management of water, waste and energy resources. These should be considered from early on in the design process to increase effectiveness and reduce conflict. Rain water harvesting/grey water treatment systems recycling systems should be incorporated in proposals wherever practical".</p>
Amenity Group/ Residents Association		Westcombe Society	<i>Creating well designed, well connected, inclusive places</i>	D	<p>D1.1 – D1.7, Placemaking: it would be helpful to have impact assessments for infrastructure, services, and the effects on the land use mix across the wider borough when considering large developments.</p>	<p>This issue exceeds the scope of the SPD. Infrastructure and other strategic planning issues will be addressed in the development of the new Royal Greenwich Local Plan. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>
Individual		Zoe Owens	<i>General comments</i>		<p>How about build more houses in stead of flats and I also think that band c applicants like my self should have a first look instead of a&b as I really need a 3 bed room 🏠</p>	<p>Noted. This issue will be addressed by the development of the new Royal Greenwich Local Plan. An issues and options "big themes" consultation for the new Local Plan is planned to take place in summer 2023. We welcome all comments which will help in the development of this and to understand how you would like to see Royal Greenwich develop within the new plan period.</p>