

Royal Borough of Greenwich

Climate Resilience SPD
Public Consultation Statement
January 2026



I Consultation

- 1.1 An eight-week formal public consultation was carried out on the draft Climate Resilience SPD from 8th September 2025 to 2nd November 2025 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). The consultation end date was extended from 19th October 2025 to 2nd November 2025 to allow for more responses.
- 1.2 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.
- 1.3 The following consultation activities were undertaken for the Climate Resilience SPD, in accordance with the Regulations and the SCI.
- 1.4 The document was publicised on the Royal Borough's website which took people to the Commonplace consultation platform. The Commonplace platform provided an explanation of each chapter within the SPD and a questionnaire form to obtain feedback. The questions are the same as those on printed copies of the Survey plus Summary booklets. 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 were provided to each library to advertise the consultation, together with hard copies of the questionnaire.
- 1.5 Notifications were sent to all those on the Planning Policy Consultation Database and the Commonplace Consultation Database (both included over 700 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.
- 1.6 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, X (formerly Twitter), and LinkedIn.
- 1.7 Copies of the consultation materials are included in Appendix A.

2 Who responded

- 2.1 The relative majority of comments were from local residents, followed by other stakeholders including public bodies and authorities. The majority of comments were anonymous via Commonplace, with the remaining comments being sent via email to the Planning Policy team email address. The emails received were from three residents and seven public bodies (Defence Infrastructure Organisation, the Environment Agency, Natural England, Port of London Authority, Royal Parks, Southwark Council, and The Theatres Trust) and an amenity group (Blackheath Society).
- 2.2 The breakdown of comments by type is set out below:

Anonymous responses via Commonplace	35
Residents' responses by email	3
Public bodies	7
Amenity societies	1
Total	46

- 2.3 The comments received have informed the Climate Resilience SPD and resulted in positive actions and amendments being taken in the preparation of the SPD. Some text and content have been revised with more signposts to resources added to improve the resourcefulness and precision of the advice given by the SPD.

3 Analysis of feedback and Council's response

- 3.1 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.

General Support and Confidence

- 3.2 Overall sentiment towards the SPD was supportive, particularly on the aims and objectives. The majority of Commonplace respondents strongly agreed with the aims of the SPD, accounting for 65% (22 responses), followed by 24% (8 responses) who agree. Only a small percentage disagreed (3%, 1 response) or remained neutral (3%, 1 response), with 6% (2 responses) strongly disagreeing.
- 3.3 Respondents' confidence in implementing interventions varied dependent on the type; respondents were more confident in implementing urban greening interventions compared to energy retrofit measures. The majority of comments also called for more effective approaches in lowering the carbon and environmental impacts caused by development.
- 3.4 Further comments requested the Council to refuse all development that is not climate resilient, some comments opposed HMO conversions, and some stated that there is no climate emergency.

Council's response

- 3.5 The Council notes the overall supportive sentiment expressed towards the SPD, particularly in relation to its aims and objectives. It is encouraging that a substantial majority of respondents either agree or strongly agree with the SPD's aims.
- 3.6 It is also acknowledged that respondents expect a more effective approach in achieving the objectives and goals of the SPD. The main text has been amended with more direct wording and advice to guide development in using climate resilient measures. Under the planning system, an SPD cannot introduce new policies. In Royal Greenwich's current planning policy context where the adopted Core Strategy (2014) is dated and a new Local Plan is being prepared, the Climate Resilient SPD will 'bridge' the adopted Core Strategy (2014) and the draft new Local Plan policies by reflecting provisions in the London Plan (2021) and other up-

to-date guidance. This means that the SPD consolidates guidance on climate change and provides information on climate resilience measures. The draft Local Plan policies are more prescriptive in language and are more proactive and in mitigating climate change and require developments to meet energy efficiency and sustainability standards. As such, the guidance in the SPD will also support these new policies once adopted.

- 3.7 Planning applications will be determined according to adopted policies and material planning considerations, this includes balancing different priorities such as meeting housing demand and lowering carbon emissions. HMO conversions are outside the scope of this SPD, but the draft Local Plan contains new policies that address this issue. The Climate Resilience SPD is based on national, regional and local policies, which recognise the significant risks posed by climate change to communities and infrastructure.

Urban Greening and Biodiversity

- 3.8 The majority of Commonplace respondents strongly supported the emphasis and measures on urban greening, with 89% (31) strongly in favour, while 3% (1) supported it and 9% (3) were neutral. There were no respondents who opposed or strongly opposed the initiative, although there were concerns regarding implementation, site-specific design, maintenance and enforcement.
- 3.9 Some common themes emerged from the comments, including the support for tree planting and green roofs, but concerns were also raised the monitoring and maintenance of existing tree stock (e.g. through making Tree Protection Orders (TPOs)) and greening as well as the need for careful planning and capital support regarding new ones. Some concerns were raised over potential pests and fire safety requirements that green walls/roofs may attract. Comments also opposed the loss of trees and open spaces in general.
- 3.10 Another common recommendation from comments was about the implementation of greening and biodiversity improvement measures, in that the Council should use a stronger approach and mechanisms, including enforcement, to ensure developments contribute positively to urban greening and climate resilient objectives. Some also criticised the language used as not sounding compulsory for development to follow. Some suggested that the Biodiversity Net Gain requirement in Royal Greenwich should go beyond the statutory requirement of 10%.
- 3.11 Some comments also suggested the establishment of a dedicated team or unit of biodiversity conservation officers to better plan and conduct conservation works. There were also suggestions to plant drought-resistant plants and to ban the use of glyphosate.

Council's response

- 3.12 The Council notes the overall supportive sentiment expressed towards the urban greening section of the SPD, we will continue working to improve Royal Greenwich's natural and built environment, with new policies and requirements in the draft new Local Plan.
- 3.13 Regarding stronger implementation and maintenance of urban greening and biodiversity measures, urban greening details and maintenance are secured by planning conditions for developments where appropriate and in compliance with adopted national, regional and local policies. Biodiversity Net Gain requirements, where applicable, are also secured by conditions. Planning conditions ensure schemes are built according to approved plans and details. There are also planning mechanisms in place, requiring developer contributions through Section 106 legal agreements and the Community Infrastructure Levy (CIL). Current planning practices and mechanisms deliver urban greening in schemes and this Climate Resilience SPD supports

these mechanisms and decision-making on planning applications in favour of urban greening, as well as supporting enforcement and maintenance of greening measures.

- 3.14 Regarding the language in the SPD, as a supplementary planning document, the SPD relies on design principles and examples to promote a best practice approach. It cannot utilise excessively prescriptive language, which could possibly be misleadingly perceived as constituting new policy. Similarly, the suggestions for the SPD to include a BNG requirement of greater than 10% cannot be adopted into the SPD as that would be introducing new policy. The remit of SPDs is to provide further guidance on policies contained within local plans but cannot introduce new policy requirements. This SPD has been revised with more direct wording wherever appropriate; with the draft new Local Plan proceeding through the plan-making process, we will consider the language and compulsory requirements in the draft policies to ensure urban greening measures are effectively implemented. The list of urban greening and energy efficiency measures identified is illustrative rather than exhaustive.
- 3.15 Regarding suggestions for better maintenance of existing green spaces and trees, the SPD supports proper maintenance of the public realm and existing plants, and retaining trees for the benefits of residents, property and wildlife. According to the Planning Practice Guidance, although some trees or woodlands may merit protection on amenity grounds it may not be expedient to make them the subject of a TPO. The management and care of trees where in the council's ownership are administered by other departments of the council and are outside the remit of this SPD.
- 3.16 Regarding concerns on potential impacts of urban greening (e.g. pests and fire safety), such measures, where subject to planning permission, are decided on a case-by-case basis. The assessment will take into account climate resilient benefits, amenity impacts, fire safety requirements, impacts on neighbours and other material considerations, in compliance with planning legislation and policies. Neighbours and stakeholders will be able to make comments and objections through the formal consultation process in planning applications. We have added clearer guidance in the SPD for developments to seek expert fire safety/engineering advice if green roofs/walls are proposed. The Climate Resilience SPD, once adopted, will support the inclusion of greening measures in proposals.
- 3.17 The SPD recognises the importance of protecting plants and species and recommends that suitable maintenance is undertaken. The banning of glyphosate is outside the powers of the SPD as it cannot introduce new bans or policies. The Council will stay updated on any national or regional prohibition, including the proposed Plant Protection Products (Prohibition on Public Sector Use) Bill.
- 3.18 Regarding dedicated biodiversity officers, the SPD provides planning guidance that supports biodiversity through development management and policy implementation. While we share the aspiration to strengthen conservation efforts, establishing and operating a dedicated conservation unit falls outside the remit of this SPD. However, the SPD still functions to bridge the Core Strategy policies and the draft new Local Plan, in which a new and more effective approach to environmental management is proposed.

Flood Risk and Sustainable Drainage Systems (SuDS)

- 3.19 Most Commonplace respondents strongly supported the use of SuDS for flood resilience, with 82% (28 respondents) in strong agreement, followed by 9% (3) who agreed, while only 3% (1) disagreed and 6% (2) were neutral.
- 3.20 Respondents generally supported the use of SuDS in developments and the public realm. Most comments emphasised the importance of integrating SuDS into all new developments and,

where possible, retrofitting them into existing streets and public spaces. Many saw SuDS not just as an environmental enhancement, but as an essential tool for managing surface water, reducing flood risk, and supporting long-term climate resilience. In several comments, SuDS were presented as something that should be embedded as a standard requirement rather than an optional design feature, particularly in highways schemes and major development sites.

- 3.21 Particular interest was on permeable paving, respondents strongly recommended the full implementation of permeable paving across all developments, reflecting environmental impacts such as increased runoff and localised flooding; and recommended taking enforcement actions against development which replaces front gardens with concrete paving.
- 3.22 Some other comments also suggested more effective street cleaning and maintenance of drainage systems. Suggestions of using water harvesting and re-use were also expressed. Others encouraged the Council to promote or educate residents about the benefits of permeable surfaces.

Council's response

- 3.23 The Council notes the overall support for flood risk management measures and the strong support for permeable paving, alongside other forms of SuDS. The SPD fully supports implementing these measures across all developments in Royal Greenwich, with more requirements and guidance set out in the draft new Local Plan.
- 3.24 Regarding the strong support for permeable paving and suggestions of strict implementation of this across all developments, since the current Core Strategy policies do not make permeable paving mandatory for developments, the SPD cannot introduce a new policy to require this. The Council acknowledges the benefits of permeable paving and will work towards bringing more SuDS to schemes in Royal Greenwich. The SPD and any emerging Local Plan policies cannot be retrospectively applied to developments and applications validated/decided before SPD adoption. However, the draft Local Plan policies include requirements for SuDS including permeable paving on new developments. The Council will review the draft policies in the plan-making process to ensure flood risk is managed correctly through SuDS and other flood risk management strategies as informed by the Strategic Flood Risk Assessment.
- 3.25 We also acknowledge that front gardens being lost to parking is an issue. While the Climate Resilience SPD does not support replacing front gardens with impermeable paving, Class F of the Permitted Development Rights states planning permission is not needed if a new or replacement driveway of any size uses permeable (or porous) surfacing which allows water to drain through, such as gravel, permeable concrete block paving or porous asphalt, or if the rainwater is directed to a lawn or border to drain naturally. If the surface to be covered is more than five square metres, planning permission will be needed for laying traditional, impermeable driveways that do not provide for the water to run to a permeable area.
- 3.26 Other measures suggested in the comments, such as water harvesting, are supported in the SPD. Street cleaning and drainage management services are delivered through other services of the Council and external partners such as TfL and Thames Water. The SPD supports proper maintenance of the public realm and SuDS for the benefits of residents, property and wildlife.

Energy Efficiency for Existing and New Buildings

- 3.27 The SPD advises that existing and heritage buildings should use the Whole Building Approach (WBA) for refurbishment first & retrofit second to improve energy efficiency; and new

buildings should adopt a Whole Site Approach (WSA) for optimised environmental and energy performance.

- 3.28 Most Commonplace respondents strongly supported the Whole Building Approach and the 'refurbishment first, retrofit second' strategy for improving energy efficiency, with 71% (24) in strong support, and an additional 12% (4) supported it. Only 6% (2) opposed and 3% (1) strongly opposed the approach. Similarly, many respondents strongly supported the emphasis on the Whole Site Approach for improving energy efficiency in new buildings, with 79% (27) in favour, while only 9% (3) were neutral and a combined 9% (3) opposed it. Some comments expressed concern that these approaches may be experimental and not proven to be effective.
- 3.29 A common theme was the suggested provision of funding or grants for householders to carry out refurbishment and retrofitting. Other comments also highlighted the practicality and cost-effectiveness of energy efficiency measures such as heat pumps, questioning their effectiveness in smaller homes and flats, and noting potential space constraints with high operating and installation costs.
- 3.30 A considerable portion of comments mentioned that the planning rules on conservation area properties and listed buildings are too restrictive and should be relaxed to allow more energy efficiency building works to take place. Comments also recommended including more advice and guidance for undertaking energy efficiency improvement works in conservation areas and listed buildings, including specific localised advice for each conservation area.
- 3.31 Some residents also commented on missed opportunities in past refurbishment programmes, such as council housing works that relied on traditional gas boilers instead of incorporating low-carbon heating systems.
- 3.32 For larger scale developments, comments supported the use of heat networks in development and asked for more policy support for connection to heat networks. Solar photovoltaics were also supported for both retrofitting and new development. Some other comments asked for prioritising public transport before discouraging car use in developments; and for implementation of the Sustainable Streets proposals. Some comments also noted the SPD does not cover transport emissions/impacts and mitigation thereof.

Council's response

- 3.33 The Council acknowledge the support received for the suggested approaches of WBA and WSA in optimising energy efficiency. Regarding the practicality of these approaches, they are not novel or experimental ideas and have been effective in delivering high-quality sustainable building designs. Examples of the measures, particularly SuDS, green roofs, Whole Site Approach, etc. have seen extensive adoption in sites across London and England. For maximum effectiveness at individual sites, site owners are advised to seek professional advice from qualified architects and/or engineers when considering improvement works. The energy efficiency of heat pumps may vary depending on property size and thermal performance, hence the SPD is not advising on a universal measure but instead supports the use of low-carbon energy sources best suited to properties on a case-by-case basis. The suggested figure of renewable energy generation on-site for major developments is revised to better align with industry practice.
- 3.34 Regarding financial support for refurbishment and retrofitting, the SPD itself does not include funding for householders. The national investment, Warm Homes Plan, is not yet published at the time of writing this SPD. This information or signpost thereof may possibly be included in the new draft Local Plan dependent on government publication. One of its key objectives is to

share information on climate-resilient building design, helping to improve understanding of the climate emergency and the measures needed for mitigation and adaptation. The SPD also includes details on how to access planning advice.

- 3.35 In response to the planning constraints on conservation area properties and listed buildings, and planning advice on the applicable energy efficiency measures, the SPD provides information on what retrofitting measures can be applied to a property in a conservation area. Any proposals should take into account the effect of measures on the significance of the heritage assets in accordance with national, regional and local policies. The Council's Urban Design Guide SPD also contains guidance and advice on retrofitting, while respective Conservation Area Appraisals/Management Plans contain local information and guidance. This Climate Resilience SPD cannot 'relax' planning rules and application procedures for conservation area properties as this falls outside the remit of an SPD, but the support for energy efficiency measures introduced by this SPD will be a material consideration once adopted.
- 3.36 Regarding the Council's refurbishment works and the Sustainable Streets proposals, these fall outside the remit of this SPD. However, future works to improve energy efficiency will be supported where they are subject to planning control. The SPD supports retrofitting measures that involve low-carbon improvements to the building fabric and to energy systems.
- 3.37 The Council appreciates the transport area is less covered in this SPD, but given the current context and length, we believe the SPD provides a right focus on urban greening, energy efficiency and extensions.

Extensions and Improvement Works

- 3.38 Many Commonplace respondents expressed low confidence in implementing or supporting home refurbishments, 36% (12 respondents) felt "a little confident" and 33% (11) "not very confident." Additionally, 18% (6) were neutral, 9% (3) were "not confident at all," and only 3% (1) felt "very confident." Besides, 47% (16) were not aware of the design principles for common extension projects, while 35% (12) were aware and 18% (6) were unsure.
- 3.39 Several comments highlighted the value of educational and advisory support for householders, particularly around insulation, materials, and how to integrate sustainability into small-scale building projects. Respondents suggested establishing community hubs and educational efforts can help householders implement urban greening and energy efficiency measures with greater confidence. Others pointed out that the planning process should become more efficient or permissive for improvements that directly enhance climate resilience, such as renewable energy installations or improved energy performance.

Council's response

- 3.40 While we share the aspiration to strengthen conservation efforts, establishing and operating community hubs falls outside the remit of planning and therefore beyond the scope of this SPD. The SPD can, however, support climate resilient improvements where they fall within planning control, including measures such as renewable energy installations or enhancements to energy performance.
- 3.41 The SPD seeks to provide clear guidance to help make such planning processes as straightforward and supportive as possible. The SPD functions by bridging the Council's existing Core Strategy policies and the draft new Local Plan, in which new and more effective policies to tackle the Climate Emergency are proposed. The Council will continue engagement

efforts, for example through the Climate Network Group, in educating and providing information on urban greening, SuDS, and energy efficiency.

4 Summary

4.1 The preparation of a Climate Resilience SPD is generally supported. Following consultation, a number of minor improvements have also been made on all subjects, based on the pertinent comments received. These are summarised below:

- Revision of text to rectify grammatical, typographical errors and aid better understanding.
- Addition of paragraphs explaining some concepts.
- Addition of summary section in Chapter 2.
- Addition of new signposting to useful resources.
- Revision of diagrams for better legibility.

Appendix A – Consultation Materials

A.1: The following is the Survey plus Summary booklets distributed in the four main libraries in the Royal Borough. Note the booklet was printed before the consultation end date was extended to 2 November 2025.



Welcome

The Royal Borough of Greenwich wants to know what you think about our draft Climate Resilience Supplementary Planning Document (SPD). This booklet you are reading is a brief summary of the full SPD alongside survey questions.

SPD summary and survey

Thank you for taking part. Each section of the draft SPD is below, set out by policy sections A to E with questions attached for you to tell us your thoughts.

You can take part in the survey as a whole or respond to any of these individual policy sections. Please use the page table below to jump forward to the section you'd like to respond to.

A. Aims of the draft Climate Resilience SPD	Page 4
B. Greening the Grey (Chapter 2 of the SPD)	Page 6
C. Energy efficiency (Chapter 3 of the SPD)	Page 10
D. Extensions and improvements (Chapter 4 of the SPD)	Page 14
E. Your other thoughts	Page 16
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Please read each section before answering its survey question/s.

Your feedback on this document will help us build a greener and healthier borough. You can give your feedback in several different ways:

- Share your feedback online, please visit royalgreenwich.gov.uk/ClimateResilienceSurvey
- Email the planning team: planning.policy@royalgreenwich.gov.uk
- Fill in this survey and return it to a library staff member
Eltham Centre Library
Greenwich Centre Library
Thamesmere Library
Woolwich Centre Library
- Post to the council
Royal Borough of Greenwich Planning Team
The Woolwich Centre, 35 Wellington Street
Woolwich, London SE18 6HQ

Introduction

The SPD has been created to support the Royal Borough of Greenwich's Core Strategy (2014) and will be updated once a new Local Plan is adopted. It aims to benefit residents, businesses, and developers by providing guidance on climate resilience.

The SPD will help us respond to the climate emergency, which is one of the council's top priorities. We want our borough to be cleaner and greener, and documents like this help us make decisions on planning applications with that in mind. We want development that benefits new and existing communities. An SPD means that planners and developers have to prioritise the environment, which benefits everyone.

The primary focus of this SPD is Urban Greening, which means adding more plants, trees, and green spaces to Royal Greenwich. Urban Greening is also the easiest change we can make in the urban environment to help us be more prepared for climate change. More benefits are explored in detail across the SPD.

Urban Greening can also be done within the curtilage of (very close to) a building without the need for planning permission for most businesses and homeowners.

A. Aims of the draft Climate Resilience Supplementary Planning Document

Draft aims of the SPD:

- **To encourage development action which future proofs for a cleaner and greener Greenwich:** We aim to improve urban greening for all of the benefits which are clear to the borough's planning applicants and other stakeholders.
- **To help people understand the value of planting for climate resilience and our wellbeing:** We highlight the need for biodiversity; encourage the re-greening of front and rear gardens of residential and commercial properties; advocate for more community food growing spaces; call for the installation of green roofs, blue-green roofs and vertical planting to existing and new buildings; champion our borough as a sponge city.
- **To press for developments which decrease our carbon emissions:** We encourage the refurbishment of buildings and installation of low carbon energy systems (such as solar panels and air source heat pumps);

provide an understanding of carbon impacts of construction materials and the need to use climate resilient measures in

- **existing buildings:** Take a Whole Building Approach – considering all parts of your property (more on this in Chapter 3 of the SPD)
- **new buildings:** Take a Whole Site Approach – thinking about nature and carbon when designing new buildings and their surroundings (more on this in Chapter 3 of the SPD)

QUESTION 1: Please tick the box you feel matches what you think about the draft aims of the SPD and how strongly you agree or disagree with them.

Strongly agree	Agree	Neutral	Disagree	Strongly Disagree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

QUESTION 2: Do you have any suggestions for the draft strategy objectives?

B. Greening the Grey (Chapter 2 of the SPD) (urban planting, biodiversity and air quality)

In this draft SPD chapter, we suggest urban greening ideas that can be adopted in both minor and major developments (developments of different scales – see the London Plan Glossary).

Urban planting like new trees, hedges, and green roofs plays a crucial role in removing carbon dioxide from the atmosphere. Urban planting improves air quality, enhances biodiversity and can be good for people's mental health.

We suggest various urban planting measures in this chapter, including:

Biodiversity improvements – planting trees, hedges, perennials, shrubs, green roofing; vertical planting/green walls

Wildlife environment installations – bird boxes, swift bricks, bat boxes, insect hotels, hedgehog friendly fencing

Temperature control features – Trees, urban forest, planting, green roofing, vertical planting

Drainage and flood avoidance improvements – Sustainable Drainage Systems (SuDS: mimicking the way water moves naturally); replacing hard surface like concrete that water can't go through with softer surface like grass or special paving that let rain soak into the ground; incorporate blue-green roofs (roofs that have plants and can store rainwater)

Community gardens and food growing spaces – Pocket food gardens, allotments, fruit tree and orchards, herb gardens

Public realm planting – new plants and planted buffers for developments, especially those close to busy roads

QUESTION 3: Do you support the draft SPD emphasis on urban greening?

Strongly support	Support	Neutral	Oppose	Strongly Oppose
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

QUESTION 4: Do you have any suggestions for other urban greening measures?

QUESTION 5: Do you support the use of SuDS for flood resilience?

Strongly agree	Agree	Neutral	Disagree	Strongly Disagree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

QUESTION 6: Do you have any suggestions for sustainable drainage?

QUESTION 7: How confident do you feel about implementing or supporting these urban greening measures in your community?

A lot	a little bit	not at all
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

QUESTION 8: Why do you feel that way?

C. Energy efficiency (Chapter 3 of the SPD) (for existing buildings and new developments)

This chapter of the draft SPD describes practical low carbon energy technologies available to replace fossil fuel systems such as gas boilers.

Royal Greenwich's buildings, homes and workplaces are responsible for over 60% of the borough's carbon emissions. To tackle this, the Council aims to reach net zero emissions by 2030. This means we need to make our buildings more energy-efficient, switch to cleaner energy sources, and reduce waste during construction and renovation.

The SPD promotes a Whole Building Approach (WBA) to enhance insulation before installing low-carbon energy systems. It means fixing the roof, walls, windows, and floors to keep heat in during winter and out during summer. This helps reduce energy bills and makes homes more comfortable. Refurbishment should be considered first.

If your home is in a conservation area or is a listed building, there are extra rules. You may need special permission for changes like new windows or external insulation. However, improvements like internal insulation, secondary glazing, and even green roofs may still be possible with the right advice and consent.

After refurbishing, you can consider using practical low carbon energy systems. There are many ways to power your home or building more sustainably.

Generally, if your property is outside of a conservation area and is not a listed building, it will have permitted development rights for the energy systems described below.

- **Solar panels** generate electricity from sunlight.
- **Solar thermal systems** heat your water using the sun.
- **Air source heat pumps** extract heat from the air to warm your home.
- **Ground source heat pumps** use underground pipes to do the same.
- **Electric boilers and solar air heaters** are also options.

For new buildings, the Council promotes a Whole Site Approach (WSA). This means looking at the entire site as a connected system—where natural features, building design, and energy use all work together to reduce carbon emissions and adapt to climate change. The WSA includes the following elements:

- **Nature first:** retain and enhance natural features of the site like trees, hedges, and the shape of the land. The layout of the development should be designed around these natural features
- **Whole life-cycle carbon:** consider carbon emissions from building material to construction to use and operation to end of building life. (This includes various design approaches such as the fabric-first approach to construction. This means using materials and building methods that are energy-efficient and have low "embodied carbon"
- **Following the Mayor's Energy Hierarchy:** Be Lean, Be Clean, Be Green, Be Seen

QUESTION 9: Do you support the emphasis on 'Whole Building Approach and 'refurbishment first, retrofit second' as a key strategy helping us to improve energy efficiency in existing buildings?

Strongly support	Support	Neutral	Oppose	Strongly Oppose
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

QUESTION 10: Do you support the emphasis on Whole Site Approach as a key strategy helping us to improve energy efficiency in new buildings?

Strongly support	Support	Neutral	Oppose	Strongly Oppose
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

QUESTION 11: Do you have any suggestions for these energy efficiency measures?

QUESTION 12: How confident do you feel about implementing or supporting these home refurbishments or retrofitting measures in your community after reading the guidance in the SPD?

Very confident	a little confident	Neutral	not very confident	not confident at all
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

QUESTION 13: Why do you feel that way?

D. Extensions and improvements (Chapter 4 of the SPD) (to homes and other buildings)

This chapter provides guidance on climate-resilient home extensions on common home enhancement projects. It encourages the use of modular construction, green roofs, and the sun's position to reduce carbon emissions.

When designing an extension, you should always consider:

- Orientation: Harness the sun's pathway where possible, use nature to capture and repel heat and cold, and consider [Passivhaus principles](#)
- Windows: placement and size of windows for best ventilation and shading
- Construction materials: use sustainable materials wherever possible

QUESTION 14: Were you previously aware of these design principles for common extension projects?

Yes	No	Not sure
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

QUESTION 15: How useful did you find the graphics in explaining what a good extension is?

Very useful	A little useful	Neither	Not very useful	Not useful at all
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

QUESTION 16: Are you a homeowner and have considered or will consider extending your property?

Yes No

QUESTION 17: If applicable, how likely are you to consider the design measures introduced in this chapter in your home extension or improvement project?

Very likely	A little likely	Not sure	Not very likely	Not likely at all
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

QUESTION 18: What additional information would you like to see on climate-resilient home extensions?

E. Your other thoughts

QUESTION 19: Do you have any suggestions to improve the SPD?

QUESTION 20: Do you recommend any other interventions that can boost climate resilience?

SPD terminology and FAQs

What is a Supplementary Planning Document (SPD)?

An SPD provides additional detail and formal guidance on the adopted policies in the Local Plan. It does not contain new policy. An SPD is a material consideration in the determination of a planning application. That means, planning officers will consider the guidance and details contained in the SPD when assessing home improvements, extensions and other types of development that require a planning permission.

What is Climate Resilience?

Climate resilience means making sure that Royal Greenwich's neighbourhoods, buildings, transport, and green spaces can withstand and adapt to the effects of climate change.

This is important as Royal Greenwich and London as a whole is already experiencing hotter summers and wetter winters. Climate resilience helps us protect people's health and safety and avoid damage to homes, roads, and public transport. It also helps to keep essential services running during extreme weather and support biodiversity and green spaces.

In 2019, Royal Greenwich declared a Climate Emergency, recognising that the impact of climate breakdown is already causing serious damage around the world. The Council adopted a Carbon Neutral Plan in 2021, one of the Actions was to provide a Climate Resilience SPD. The SPD will contain contemporary advice regarding the local environment, climate adaptation and mitigation and how we can make improvements to biodiversity and air quality which intersect with climate issues.

The primary stakeholders for the SPD will be local residents, landowners and developers. The Climate Resilience SPD advises on how to future proof a property and create developments to withstand the extreme weather events that are the result of global warming.

What is Urban Greening?

Urban greening means adding more plants, trees, and green spaces to Royal Greenwich. It's about making the urban environment greener, healthier, and more pleasant for people and wildlife. It can be easily done in smaller scales and in larger developments, across the whole Royal Borough. Urban greening can reduce greenhouse gas emissions as well as guard against the impacts of extreme weather events, often at a lower cost compared to other options for climate resilience. As such, urban greening is our superpower for climate resilience and will support the re-building of a greener Greenwich overall.

What is a nature-first approach?

It means thinking about nature at the heart of planning and development. Translated into actions, this can mean making sure planting, sustainable drainage (SuDS), shading and cooling, and biodiversity to be embedded into the design of the scheme for climate resilience. To adopt a nature-first approach, retain and enhance natural features of the site like trees, hedges, and the shape of the land. The layout of the development should be designed around these natural features.

What is a sponge city?

This refers to the installation of additional green/planted areas and the replacement of concrete hardstanding with permeable surfaces in urban areas. For the Royal Borough, additional nature can be incorporated through the restoration of front gardens with trees and hedged boundaries; better planting and maintenance of street verges and installation of new ones in the form of Sustainable Drainage Systems (SuDS). SuDS should also be designed into all new developments help to improve water quality, biodiversity and climate resilience.

What are Sustainable Drainage Systems (SuDS)?

A Sustainable Drainage System (SuDS) is a set of water management components put together to help to absorb excess rainfall, minimise the pollution of urban run-off and improve water quality. It provides a more sustainable approach to managing rainfall by mimicking the way water moves naturally through a site. Common types of SuDS include rainwater harvesting, rain gardens, swales, attenuation tanks, moisture banks, blue-green roofs, filter strips, filter drains, tree pits, and basins/ponds. If you need advice about whether planning permission is required for installation of a SuDS at a site, please contact the duty planner: dutyplanning@royalgreenwich.gov.uk

TRANSLATION

Please contact Royal Greenwich Interpreting Service if you need this booklet translated for you.

Telephone: 020 8921 3928

Email:
interpreting@royalgreenwich.gov.uk

अनुवाद

यदि तपाईंलाई यो पुस्तकिका अनुबाधति भएको चाहिँमा कृपया रोयल ग्रीनविच इन्टरप्रेटिङ सेवामा सम्पर्क गर्नुहोस;

टेलीफोन: 020 8921 3928

इमेल:
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Vă rugăm să contactați Serviciul de Interpretare al Consiliului Local Greenwich dacă aveți nevoie de traducerea acestei broșuri;

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ROYAL *borough of*
GREENWICH


A.2: The following is the RBG webpage advertising the consultation of the Climate Resilience SPD. Accessible at the link: [Moving from climate emergency to climate resilience: pioneering plan to future proof our borough](https://www.royalgreenwich.gov.uk/news/moving-from-climate-emergency-to-climate-resilience-pioneering-plan-to-future-proof-our-borough)



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Moving from climate emergency to climate resilience: pioneering plan to future proof our borough



Friday 5 September 2025

The effect development has on the climate is incredibly important and is at the heart of a new planning document that we are asking for feedback on.

Our new Climate Resilience Supplementary Planning Document (SPD) puts the climate front and centre of development across our borough.

Six years ago, we declared a climate emergency and started to plan how the council can become carbon neutral by 2030.

Developed to help residents, developers and businesses shape a more sustainable future for the Royal Borough of Greenwich, the SPD sets out practical measures to prepare for the rising risks of extreme heat, flooding, and pollution which are already affecting London.

Our council is among the first to bring forward a planning document focused on climate resilience, rather than only carbon reduction.

A Royal Borough of Greenwich spokesperson said: "The climate crisis is one of the biggest challenges faced globally right now. We have said previously that we would meet our commitment to being carbon neutral by 2030 head on – and this document is proof of that.

"It shows how we can adapt – and lead – with solutions that are green, local and practical. Urban greening – or put simply, the greening of urban space - can have a transformative effect from planting trees and hedges to more modern solutions such as planting on rooftops and sustainable drainage. It is an approach that we feel can be implemented and improved across the borough.

"Not only can that approach help improve drainage that can prevent flash flooding and shade areas from overheating it can also aid the area's biodiversity. Urban greening can be our climate superpower."

The document also outlines how to:

- Reduce reliance on fossil fuels for heating and transport
- Improve existing buildings through retrofit and refurbishment
- Promote a circular economy by reusing materials
- Embrace a 'Sponge City' approach to managing surface water and help urban spaces thrive

The consultation is open until 2 November 2025 and you can have your say at royalgreenwich.gov.uk/ClimateResilienceSurvey or by emailing planningpolicy@royalgreenwich.gov.uk.

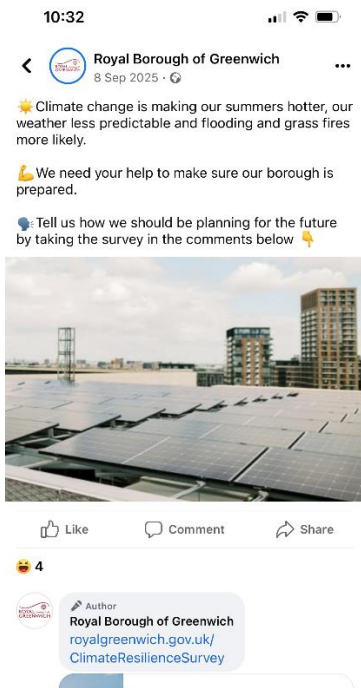
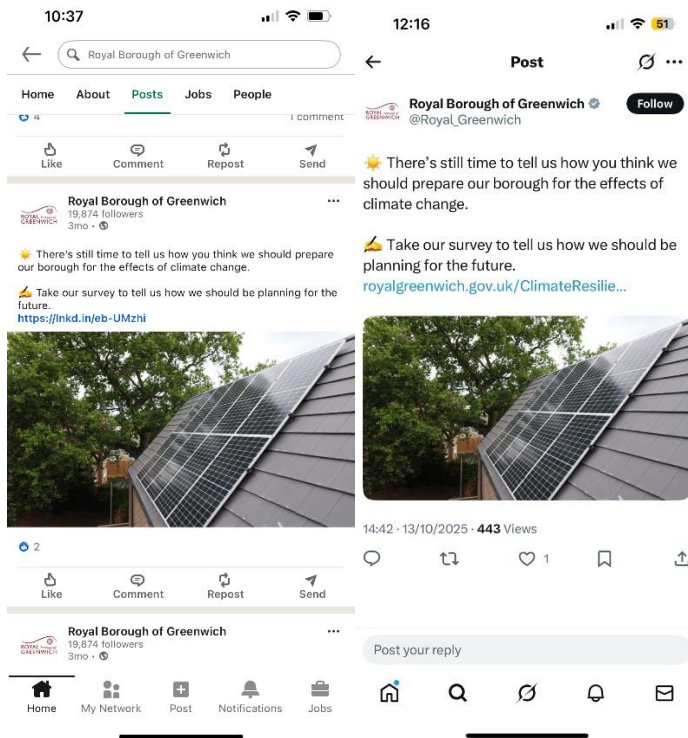
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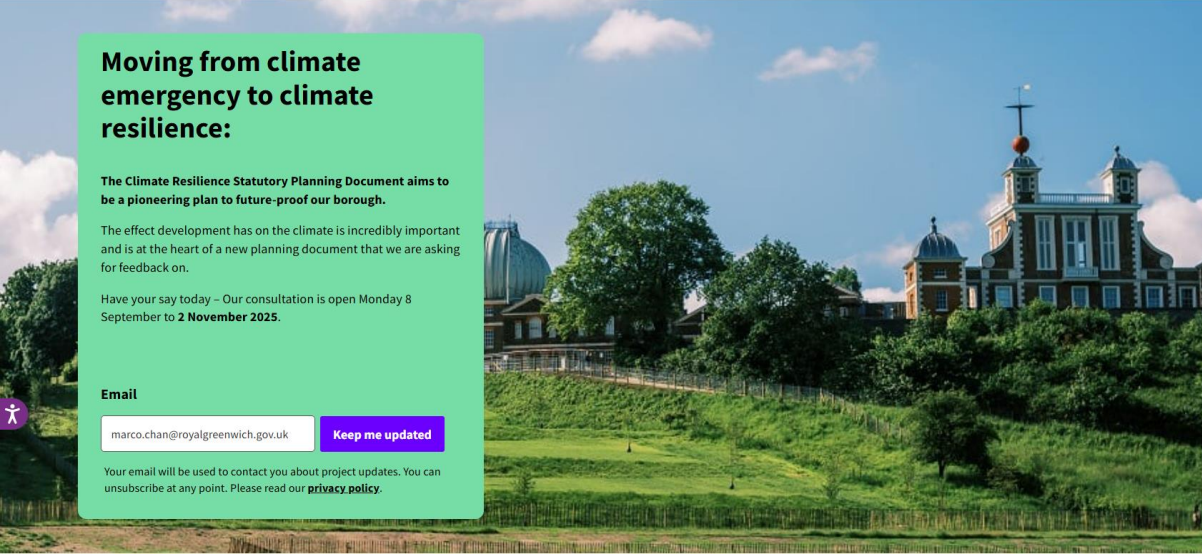
Yes No

[▶ Contact us](#)

A.3: The following shows the SPD being advertised on various social media platforms, including: Facebook, LinkedIn, and X (formerly Twitter).



A.4: The consultation platform, Commonplace, for the public consultation on the SPD. Accessible at [Community Forum - Greenwich Climate Resilience - Commonplace.](#)



Moving from climate emergency to climate resilience:

The Climate Resilience Statutory Planning Document aims to be a pioneering plan to future-proof our borough.

The effect development has on the climate is incredibly important and is at the heart of a new planning document that we are asking for feedback on.

Have your say today – Our consultation is open Monday 8 September to **2 November 2025**.

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Introduction

Other ways to take part

HAVE YOUR SAY AND LEARN MORE


4 proposals



Draft Climate Resilience SPD: consultation survey

The Royal Borough of Greenwich would like to know what you think.


33 [Answer the survey](#)



Full draft Supplementary Planning Document

Click here to view the full, draft Supplementary Planning Document.


[Get informed](#)



SPD terminology and FAQs

Learn more about some of the terminology in this planning document.

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Royal Borough of Greenwich Council

Appendix B - Representations received and RBG response

Respondent ID	Summary of response	Council's response
68bfe43f7ded7c ab5255e6db	In strong support of SPD aims and content, average confidence in implementing interventions. No other comments.	Noted.
68c00c708339f bfb694a0587	<ul style="list-style-type: none">• In strong support of SPD aims and content, average confidence in implementing interventions.• Unsure of involvement in refurbishment and retrofitting, would welcome information on financial and advisory support from the council	The SPD is intended primarily as a guidance tool rather than a requirement for involvement. One of its key objectives is to share information on climate-resilient building design, helping to improve understanding of the climate emergency and the measures needed for mitigation and adaptation. The SPD also includes details on how to access planning advice. The national investment, Warm Homes Plan, is not yet published at the time of writing this SPD. This information or signpost thereof may possibly be included in the new draft Local Plan dependent on government publication.

68c02774ed008
a4882bab361

- In strong support of SPD aims and content, low confidence in implementing interventions
- Council house refurbishment did not install green energy and relied on gas boilers
- The Council should implement Sustainable Streets as soon as possible

Current council house refurbishing is outside the remit of planning. To our understanding refurbishing may include internal, external, safety and compliance, and energy efficiency improvements. These include works to make the building fabric (windows, doors, walls, roofs) and ventilation systems of council homes lose less heat. Future retrofits may involve more low-carbon improvements by installing more efficient heating options.

The draft new Local Plan introduces new policies for retrofitting and refurbishment and support energy efficiency improvements that reduce carbon emission and extend building lifespan.

The Sustainable Streets programme has finished consultation stage in November 2025 and the Council will review responses and make decisions in due course.

68c02e9a308e9
a62f72fdca0

- In strong support of SPD aims and content, average confidence in implementing interventions
- Urban greening should also consider maintenance plans for current plantings and long-term capital consideration for new ones
- SuDS should be built into all highways scheme and retrofitted whenever possible
- lack of clarity about national investment in retrofitting and refurbishment
- suggest SELCE as a good source of information
- suggest more information on financial support
- suggest more networking and communication with residents and local volunteer initiatives on climate resilient measures

Urban greening details and maintenance are secured by planning conditions for large sites/schemes where appropriate and in compliance with adopted national, regional and local policies. Biodiversity Net Gain requirements, where applicable, are also secured by conditions. The draft new Local Plan requires SuDS to be incorporated in major development and new buildings. The national investment, Warm Homes Plan, is not yet published at the time of writing this SPD. This information or signpost thereof can be included in the new draft Local Plan. Networking and communication with volunteers and residents have been in place in various forms, such as the Climate Network Group.

8c2670ea78c93
fea482d007

- In slight support/neutrality on SPD aims and content, low confidence in implementing interventions
- objects to tree planting close to property foundations
- objects to street parking restrictions that encourage residents to pave front gardens for parking or charging
- requests customised approach in different locations, complains on street cluttering for disabled people
- requests prioritising fire safety in energy efficiency measures
- suggests that heat pumps cannot be used in flats and homes that do not have enough space
- raises concern over neighbour objections on green roofs as they may bring insect infestation
- suggests ban on fire pits and wood burners in homes and gardens due to smoke pollution

Urban greening measures, where subject to planning applications, will be decided on a case-by-case basis taking into account of climate resilient benefits, amenity impacts, fire safety requirements, impacts on neighbours and other material considerations, in compliance with planning legislation and policies. Neighbours and stakeholders will be able to make comments and objections through the formal consultation process in planning applications. The SPD does not impose mandatory requirements for green roofs and trees to be planted, but functions as additional guidance to the Core Strategy and the draft Local Plan. Heat pumps can be used in flatted developments and smaller sized homes if designed appropriately. Bonfires in existing properties are outside the remit of this SPD. The draft Local Plan policies do not permit new buildings and homes to use fossil fuel for heat or energy.

68c4105e9cd1b
c66d8df95ec

- In strong support of SPD aims and content, high confidence in implementing interventions
- requests providing and encouraging the use of public transport before discouraging the use of cars
- suggests improving the quality of building design to make buildings and surrounding green spaces last longer
- suggest urban greening design to take into account desire paths and pedestrian circulation
- supports the idea of community garden and food growing, suggest repurposing grass area around council estates
- suggest educational efforts to property owners and advise the use of permeable paving
- points out that extensions need to balance climate resilient principles and good urban design

Providing and encouraging the use of public transport has been a focus area of the Council's work, albeit not a primary focus of this SPD.

High quality building design is always a planning policy requirement for development in the Core Strategy and the draft Local Plan. The SPD provides guidance as to what high quality building design should include in terms of climate resilience and sustainability. Public realm design should take into account good connectivity and circulation, as in line with adopted planning policies.

The Royal Borough will continue engagement efforts, for example through the Climate Network Group, in educating and providing advice on urban greening, SuDS and permeable paving.

68c44a713ada3aa0fd3a3c57	<ul style="list-style-type: none"> • In strong support of SPD aims and content, average confidence in implementing interventions • suggests planting drought tolerant plants • suggests planning to be taken 'in house' • suggests council is important in giving ideas on community actions • suggests protecting street plants and stronger enforcement against flytipping 	<p>The SPD signposts readers to resources on what plant species are suitable for urban greening.</p> <p>Planning functions are performed by the Planning teams under the Directorate of Place and Growth in the Council.</p> <p>The Council will continue to provide information and support for climate adaptation and mitigation.</p> <p>Flytipping and enforcement against it is not within the remit of this SPD.</p>
68c448095baa4c54d349f251	<ul style="list-style-type: none"> • In strong support of SPD aims and content, average confidence in implementing interventions • requests more information on how retrofitting measures can be applied to conservation areas 	<p>The SPD provides information on what retrofitting measures can be applied to a property in conservation area. Any retrofitting should take into account the appearance and significance of the heritage assets. The Urban Design Guide SPD also contains guidance and advice on retrofitting.</p> <p>The SPD functions as part of the suite of adopted and emerging planning policies, and enforcement will continue to play a key role in achieving these policy aims.</p> <p>The SPD and any emerging Local Plan policies cannot be retrospectively applied to developments and applications validated/decided before SPD adoption. However, the draft Local Plan policies include requirement on SuDS including permeable paving on new developments. The Council will review the draft policies in the plan-making process.</p>
68c72ad9681909b4b9f13d16	<ul style="list-style-type: none"> • In strong support of SPD aims and content • suggests stronger mechanisms including enforcement to deliver urban greening and climate resilient objectives • concern regarding householder paving over front gardens and identified need for 'reclaiming' these 	<p>Noted.</p>
68c824238b11969dc867f1fe	<ul style="list-style-type: none"> • In strong support of SPD aims and content • No further comments 	<p>The SPD recognises the importance of protecting plants and species and recommends that suitable maintenance is undertaken. The banning of glyphosate is outside the remit of the SPD as it cannot introduce new bans or policies. The Council will stay updated on any national or regional</p>
68c44a713ada3aa0fd3a3c57	<ul style="list-style-type: none"> • In strong support of SPD aims and content • asks for stopping the use of glyphosate like in Paris and for protecting street plants 	<p>The SPD recognises the importance of protecting plants and species and recommends that suitable maintenance is undertaken. The banning of glyphosate is outside the remit of the SPD as it cannot introduce new bans or policies. The Council will stay updated on any national or regional</p>

- 68cc2a9ef5bfe2e564c51c68
 - In strong support of SPD aims and content, average confidence in implementing interventions
 - suggests widening tributary rivers
 - suggest stronger effort to ensure compliance, e.g. construction standards
- 68d27ba2043c892add6cbdaf
 - In strong support of SPD aims and content, average confidence in implementing interventions
 - requests the Council to require developments to contribute positively to the community, for example by planting trees and impact mitigation
 - suggests preventing paving over front gardens
 - questions are poorly worded
 - In strong support of SPD aims and content, average confidence in implementing interventions
 - concern over the responsibility of maintenance and watering of plants
 - suggests including futureproofing developments for heat network connection
 - concern over funding for retrofitting and refurbishment
- 6842f2fa6e3f4d21ce105192
 - In objection of SPD aims and content
 - suggests that there is no climate emergency
- 68d27ba2043c892add6cbdaf
 - In strong support of SPD aims and content, average confidence in implementing interventions
 - Suggest taxing or penalising residents who pave front gardens

prohibition, including the proposed Plant Protection Products (Prohibition on Public Sector Use) Bill.

Widening rivers may not be an effective flood risk management method. The Strategic Flood Risk Assessment will inform the Council's policies in this regard.

The Council will continue to provide information and support for climate adaptation and mitigation to ensure compliance with adopted legislation and policies.

Planning mechanisms are in place requiring developer contributions through Section 106 legal agreements and Community Infrastructure Levy.

The draft Local Plan policies include requirement on SuDS including permeable paving on new developments. The Council will review the draft policies in the plan-making process.

Noted regarding consultation questions, the Planning Policy team will word better questions in future consultations.

The draft Local Plan includes policies on futureproofing developments for heat network connections.

The responsibility of funding and maintenance of green space and plants in a development are usually on owners of the property/development.

The Royal Borough of Greenwich, along with the Greater London Authority and 29 other London boroughs, have declared Climate Emergency in light of frequent flooding and heat waves, and rising temperatures.

The draft Local Plan policies include requirement on SuDS including permeable paving on new developments. The Council will review the draft policies in the plan-making process.

68ea60487ca7
43adec3b028

- In strong support of SPD aims and content, high confidence in implementing interventions
- suggests stronger actions from council to require developers to encourage active travel, provide recycling and responsible waste disposal facilities, and implement all proposed green measures in developments
- opposes removal of existing trees and open spaces
- calls on the Council to refuse planning permission for developments not climate resilient
- suggests SPD guidance and policies to sound more compulsory rather than wordings like 'where possible'

68eb9e22506c0
793dbeba70b

- Neutral towards SPD aims and content, no confidence in implementing interventions
- calls for effective street cleaning and maintenance of drainage system
- opposes promoting flatted developments and HMO conversions

68ee0a16f9f809
009abeb624

- In strong support of SPD aims and content
- No further comments

The remit of the SPD is that it cannot introduce new policies, it instead gives additional guidance and information on adopted planning policies, which are currently the Core Strategy in RBG's local context. The new draft Local Plan can go further in terms of climate resilient, energy efficiency and greening measures, which this Climate Resilience SPD would still be relevant and serve as supplementary guidance.

Implementation of Local Plan policies will improve the climate and environmental performance of development in Royal Greenwich. Planning applications will be determined according to adopted policies and material planning considerations, this includes balancing different priorities such as meeting housing demand and lowering carbon emissions.

The SPD is written in an informative manner, which can complement the more certain wording in the Core Strategy and the draft Local Plan.

Street cleaning and drainage management services are delivered through other services of the Council. The SPD supports proper maintenance of the public realm and SuDS for the benefits of residents, property and wildlife.

HMO conversions are outside the scope of this SPD, but the draft Local Plan contains new policies that address this issue. Flatted developments can also contribute towards biodiversity and urban greening.

N/A

- In strong support of SPD aims and content, high confidence in implementing interventions
- suggests to include policies on commons and ponds
- remarks that the 2030 target for net zero is not achievable
- suggests solar panels above car parks
- suggests coverage on transport emissions and measures
- requests specific advice for each conservation area
- suggests showcasing successful cases

68f2825396787
4da05fd6eff

The SPD provides guidance for householders, developers and residents across several policy areas, including flood risk, biodiversity, air quality, extensions, energy efficiency, and many more. The Council appreciates there are areas less covered in this SPD, but given the current context and length, we believe the SPD provides a right focus on urban greening, energy efficiency and extensions. Since the SPD serves a supporting role to main planning policies in the Core Strategy and draft Local Plan, the advice and guidance in other areas including transport and conservation areas can be better presented in other planning documents, including the Urban Design Guide SPD and respective Conservation Area Appraisals/Management Plans.

- In strong objection of SPD aims and content
- suggests that there is no climate emergency
- suggests that more CO2 is beneficial

68f28a2bd5c98
15cac743953

The Climate Resilience SPD is based on scientific consensus and national, regional and local policies, which recognize the significant risks posed by climate change to communities and infrastructure. Increasing CO₂ levels is not considered a viable solution, as the broader impacts—such as extreme weather and rising temperatures—pose serious challenges to resilience and public health. The Climate Change Act 2008 legally obliges the country to both reduce greenhouse gas emissions and adapt to climate change.

- In strong support of SPD aims and content, average confidence in implementing interventions
- No further comments

-

N/A

- 68f4d6379dfdbb
c6b5266d71
 - In strong support of SPD aims and content, average confidence in implementing interventions
 - considers restrictions on listed buildings and conservation areas too strict, calls for energy efficiency interventions to be more accepted
- 68fa15fd4e0ed4
f39c9b4a73
 - In strong support of SPD aims and content, high confidence in implementing interventions
 - No further comments
- 68fb220eeb6cfe
067f7c5b1b
 - In strong support of SPD aims and content, average confidence in implementing interventions
 - considers restrictions on listed buildings and conservation areas too strict, calls for energy efficiency interventions to be more accepted
 - concerned about the balancing of housebuilding targets and climate resilient goals

Heat pumps and solar panels should be carefully placed and installed as they may have visual or noise impacts. While energy retrofit and renewable energy are supported, due consideration must also be given to the appearance and significance of heritage assets in compliance with the NPPF, London Plan and local planning policies, in order to avoid harm or loss of heritage assets.

N/A

While energy retrofit and renewable energy are supported, due consideration must also be given to the appearance and significance of heritage assets to be in compliance with the NPPF, London Plan and local planning policies, in order to avoid harm or loss of heritage assets.

68fe1741e10a9
4faba2c57b5

- In strong support of SPD aims and content, average confidence in implementing interventions
- concerns over developers not delivering proposed/approved green measures
- suggests more promotional and educational efforts on the benefits of climate mitigation and adaptation

Urban greening details and maintenance are secured by planning conditions for large sites/schemes where appropriate and in compliance with adopted national, regional and local policies. Planning conditions ensure schemes are built according to approved plans and details. Biodiversity Net Gain requirements, where applicable, are also secured by conditions. The Climate Resilience SPD, once adopted, will support the inclusion of greening measures in proposals. The SPD performs its planning role in providing guidance in development management and also give information to aid the general understanding of climate change. While the SPD itself does not introduce educational events in the short term, it complements wider efforts by raising awareness through planning policy and supporting informed decision-making. We see this as an important step toward embedding climate resilience into everyday development practices, and it can provide a foundation for future engagement initiatives.

68fe1741e10a9
4faba2c57b5

- In strong support of SPD aims and content, average confidence in implementing interventions
- concerns over young/new trees planted not receiving care
- suggests the need of a dedicated team of biodiversity officers
- objects to the removal of any mature tree
- suggests water harvesting and re-use for SuDS
- suggests more promotional and educational efforts on insulation and the benefits of green measures

The Climate Resilience SPD, once adopted, will support the inclusion of greening measures in proposals.

The planting of trees and their care/maintenance will be secured by planning conditions if appropriate.

The SPD performs its planning role in providing guidance in development management and also give information to aid the general understanding of climate change. While the SPD itself does not introduce educational events in the short term, it complements wider efforts by raising awareness through planning policy and supporting informed decision-making. We see this as an important step toward embedding climate resilience into everyday development practices, and it can provide a foundation for future engagement initiatives.

68ff485890dce9
b32647840d

- Mixed views of SPD aims and content, no confidence in implementing interventions
- suggests no new development should be allowed for the preservation of biodiversity
- suggests Council to refuse any planning application that does not comply with carbon policies
- suggests nature should come first in any development
- suggests consideration of Whole Life Cycle Carbon
- suggests banning concrete paving over driveways
- calls for extensions schemes to be examined carefully in light of climate friendliness

The Climate Resilience SPD works alongside the Core Strategy and will complement the new draft Local Plan in providing clear and effective policies and guidance in pushing development to be low carbon and climate resilient. While planning policies in Climate Emergency and Environment in the adopted development plan will take significant weight in the determination of planning applications, the Royal Borough needs to reach a planning balance where other needs, such as housing and employment space, would also need to be met. Hence, it is unlikely that all new development would be refused, however the Planning service will ensure applications are properly assessed against adopted planning policies. This would help development to contribute to climate resilience efforts.

68ffa3e5deb6f9
20725bc6e0

- In strong support of SPD aims and content, average confidence in implementing interventions
- concerns over Council's powers and consistency in implementation
- suggests more educational efforts regarding permeable paving
- concerns over deliverability and conformity on implementing green measures in sites (e.g. Greenwich Peninsula)
- concerns over householders not aware of the SPD

The Climate Resilience SPD, once adopted, will support the inclusion of greening measures in proposals. When developers and householders submit planning applications, proposals will be assessed by planning officers taking into account material considerations which this SPD is part of. Proposals which include no greening or SuDS measures are not supported by planning policies.

The Council is dedicated to improving green infrastructure and climate resilience in the borough, with the draft Local Plan being the newest development plan in planning with which we can require developments in Royal Greenwich to be lower carbon and contribute to tackling climate change. The draft Regulation 18 Local Plan is being consulted on at time of writing after being approved at Full Council for public consultation, we very much welcome comments on the draft Local Plan in the consultation stages.

68fb8f2e1c2f70f
14e0d2580

- In strong support of SPD aims and content, high confidence in implementing interventions
- concerns over high operation costs of heat pumps

The cost of installing and running a heat pump is dependent on the age and size of the property. However, more savings can be achieved through heat pumps if the property is well-insulated and the current gas boiler is older or less efficient.

690393a9a7215
ab913eb1f2e

- Mixed views of SPD aims and content, low confidence in implementing interventions
- concerned that the measures proposed in the SPD are not proven effective or are too prohibitive in cost, such as SuDS and Whole Site Approach
- suggested that climate resilient measures should be cost-effective

The measures proposed in the SPD are not novel or experimental ideas. Examples of the measures, particularly SuDS, green roofs, Whole Site Approach, etc. have seen extensive adoption in sites across London and England. For maximum effectiveness at individual sites, site owners are advised to seek professional advice from qualified architects and/or engineers when considering improvement works.

68ffa3e5deb6f9
20725bc6e0

- In strong support of SPD aims and content, average confidence in implementing interventions
- concerns over Council's powers and consistency in implementation
- suggests more educational efforts regarding permeable paving
- concerns over deliverability and conformity on implementing green measures in sites (e.g. Greenwich Peninsula)
- concerns over householders not aware of the SPD

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69048e3e3ea92
62ab1ffbdf

- In strong support of SPD aims and content, average confidence in implementing interventions
- concerns over lack of conservation unit and management plan for wildlife and SINCs
- suggests setting up a conservation unit for wildlife conservation and management of nature spaces

As part of the draft Local Plan evidence base, a SINC review was commissioned by the Council to assess the conditions of the SINCs in Royal Greenwich, this review is available to view online. The Council continues to support local volunteering efforts in green space management.

The SPD provides planning guidance that supports biodiversity through development management and policy implementation. While we share the aspiration to strengthen conservation efforts, establishing and operating a dedicated conservation unit falls outside the remit of this SPD. However, the SPD still functions to bridge the outdated Core Strategy policies and the draft new Local Plan, in which a new and more effective approach to environmental management is proposed.

6907723760c08
b32d6222814

- In strong support of SPD aims and content, average confidence in implementing interventions
- suggests mandatory requirements for all developments to include growing spaces
- suggests setting up a biodiversity team to coordinate and advise parks groups
- supports SuDS
- suggests setting up community hubs that advise on buildings, energy efficiency, food growing, and climate resilience
- concerned that WBA is too prescriptive

While we share the aspiration to strengthen conservation efforts, establishing and operating community hubs falls outside the remit of the planning system and this SPD. However, the Council may also consider this type of engagement and resources in the longer term. The SPD still functions to bridge the outdated Core Strategy policies and the draft new Local Plan, in which a new and more effective approach to environmental management is proposed. As part of the draft Local Plan evidence base, a Local Nature and Open Space Study was commissioned by the Council to assess the provision and condition of green infrastructure including growing spaces in Royal Greenwich. This study would inform draft Local Plan policies on open space and green infrastructure requirements.

6907c892ccd1b
1507e33f7db

- In strong support of SPD aims and content, low confidence in implementing interventions
- suggests less Council intervention but more educational efforts, especially on extensions and insulation
- suggests stricter rules on energy supply in developments
- suggests easier planning process for renewables improvements

Resident

SPD should cover ban on bonfires and wood burning stoves in air quality section. Poor air quality the Balcaskie Road/Beechhill Road areas of Eltham.

The Council is dedicated to improving green infrastructure and climate resilience in the borough, with the draft Local Plan being the newest development plan in planning with which we can require developments in Royal Greenwich to be lower carbon and contribute to tackling climate change. This SPD will function as an important planning guidance to provide developers and householders a convenient reference as to what climate resilient measures are available.

Renewable energy improvements are supported by planning policies, the approval process is under the standard planning application and permission regime if Permitted Development Rights do not apply, as in conformity with the national planning system.

Resident behaviour in existing property is outside the remit of this SPD and the wider planning system. However, air quality has been covered in this SPD and Core Strategy and draft new Local Plan policies.

Resident	<p>No strategy for managing Greenwich's mature street and park trees, which are the borough's most significant climate mitigation asset.</p> <p>Should include recommendations to protect existing street and park tree stock, incl: greater use of TPO, modern urban tree management systems, clearly state tree felling is last resort</p>	<p>The SPD supports retaining on-site trees and other natural features in the nature-first approach. Urban greening and its proper maintenance is also recommended in the SPD. According to the Planning Practice Guidance, although some trees or woodlands may merit protection on amenity grounds it may not be expedient to make them the subject of a TPO. For example, it is unlikely to be necessary to make an Order in respect of trees which are under good arboricultural or silvicultural management. (Para 010, PPG on TPO) Where relevant to an assessment of the amenity value of trees or woodlands, authorities may consider taking into account other factors, such as importance to nature conservation or response to climate change. These factors alone would not warrant making an Order. (Para 008, PPG on TPO) Tree (risk) management via modern systems are in place, implemented by other departments of the Council.</p>
Resident	<p>Should include the following: Stronger enforcement to ensure proposed green measures are implemented in developments Drainage measures including water harvesting and regular upkeep More tree care and management are needed in the borough The need for insulation and ventilation should be publicised Educational and promotional efforts on benefits of tackling climate change should be communicated</p>	<p>The SPD aims to provide both advice to applicants of planning applications and information to the public. The SPD works within the current planning mechanism where planning conditions are imposed to ensure detail green measures are submitted and approved at appropriate stages of development.</p> <p>References have been added in the SPD to clarify that greening measures and long-term management plans will be secured via planning conditions and/or legal agreements where appropriate and as per adopted legislation and policies.</p>

<p>Blackheath Society</p>	<p>Needs to highlight importance and challenge of protecting existing tree stock</p> <p>Should include the following in the SPD: Greater use of TPO, for all large trees inside and outside Conservation Areas Commitment to enforcement Advice on siting, planting method and the need for a clear maintenance plan for trees</p>	<p>References have been added in the SPD to clarify the need of considering siting, planting method and maintenance when proposal affects trees; other amendments also made where appropriate.</p> <p>According to the Planning Practice Guidance, although some trees or woodlands may merit protection on amenity grounds it may not be expedient to make them the subject of a TPO. For example, it is unlikely to be necessary to make an Order in respect of trees which are under good arboricultural or silvicultural management. (Para 010, PPG on TPO) Where relevant to an assessment of the amenity value of trees or woodlands, authorities may consider taking into account other factors, such as importance to nature conservation or response to climate change. These factors alone would not warrant making an Order. (Para 008, PPG on TPO)</p>
<p>Defence Infrastructure Organisation</p>	<p>Vertical planting and/or green walls are likely to present a challenge</p> <p>Listed buildings should not accommodate (blue-)green roofs, more reference to heritage constraint, case-by-case basis</p> <p>Unaligned and unclear wording regarding food growing</p> <p>Also reference organisations apart from GCDA</p> <p>PV energy generation targets too ambitious</p>	<p>SPD does not mandate vertical planting and always recommend professional fire/building safety assessments are sought. References have been added in the SPD to clarify that proposals need to consider heritage and amenity impacts when proposing greening and energy efficiency measures. The suggested figure of renewable energy generation on-site for major developments is revised to better align with industry practice.</p>
<p>Natural England</p>	<p>The topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.</p>	<p>Noted.</p>

Environment Agency	Recommend including links and more direct guidance in various sections, including flood risk management, pollution prevention, water resources, construction waste, etc.	More advice and guidance added to the SPD with regards to the issues raised.
Port of London Authority	Recommend including Greenwich case studies in Estuary Edges guidance mention	References added.
		Edits and references were made to the SPD where appropriate. We appreciate not every aspect of biodiversity or environmental features has been mentioned, but given the context and length of the SPD, we believe the SPD provides a right focus on urban greening, energy efficiency and extensions suited for a wide range of readers. Main BNG policy requirements are in the draft Local Plan, the SPD itself cannot impose new requirements. Advice on building heights and views are covered by the Urban Design Guide SPD.
The Royal Parks	In general support of the SPD, various edits suggested throughout different chapters. Concerns raised regarding: BNG targets should be higher than 10% Ice cream vans causing air pollution Building heights, retrofitting and historic views More information on geodiversity	
Southwark Council	In general support of the SPD, various edits suggested throughout different chapters.	Noted. Edits made to the SPD where appropriate.
Theatre Trust	supportive of this SPD coming forward and of its content as it provides additional guidance to support applicants within Greenwich	Noted.

-End-

