

Royal Borough of Greenwich Local Plan

Consultation Statement

June 2026

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1. Introduction

- 1.1 This consultation statement responds to the representations received on the Regulation 18 Draft Local Plan Consultation and constitutes a material planning consideration.

Previous Engagement

- 1.2 Prior to Regulation 18 Consultation on the Draft Local Plan, we held previous engagement and consultation with stakeholders through our 2023 “Big Themes” Issues and Options consultation and 2024 “Call for Sites” exercise. The feedback from this engagement had been used to shape the policies in the Draft Local Plan, alongside the evidence base.
- 1.3 The “Big Themes” Issues and Options consultation was held between July and September 2023. There were 303 responses from a variety of different organisations and individuals. The “Call for Sites” exercise ran from April to July 2024 and received 141 responses. Feedback from both of these engagement activities has been used to inform the policies and allocations in the Regulation 18 Draft Local Plan.

Regulation 18 Draft Local Plan

- 1.4 The Regulation 18 Draft Local Plan was published for public consultation over an eight-week period from 15 December 2025 to 8 February 2026. This provided residents, businesses, community groups, landowners, and other key stakeholders with the opportunity to share their views on the Plan’s policies and overall approach.
- 1.5 The Draft Local Plan was made available online via the Council’s planning webpages and through the Council’s consultation hub on the Commonplace platform, available here: [Community Forum - Greenwich Local Plan - Commonplace](#). The platform also displayed easy-read versions of the policies to allow for increased accessibility, as well as maps to display site allocations in their respective locations, and a timetable of consultation events happening over the 8-week period with location / timing details.
- 1.6 The local plan was advertised across multiple channels, as below:
- Emails were sent to the planning policy consultation database (715 contacts) which contained neighbourhood forums, community groups, residents,

members and other stakeholders including statutory consultees, neighbouring local planning authorities and developers;

- Emails were sent to individuals who had registered via Commonplace;
- Posts were made across social media platforms, including LinkedIn, TikTok, Instagram and Facebook and X;
- Emails were sent to residents on the Royal Greenwich tenants mailing list and Royal Greenwich leaseholders mailing list; and
- Emails were sent to affiliate groups of Shrewsbury House, to several community groups, and sent to significant borough housing providers (e.g., Greenwich Housing Association, Meridian Home Start, Peabody) to be forwarded on to their mailing lists.

1.7 Hard copies of the Draft Local Plan were also available at the following libraries: Eltham, Woolwich, Greenwich and Plumstead. These locations provided supporting materials, including summary posters, summary sheets for each chapter of the Plan, a borough-wide map showing site allocations and printed questionnaires to gain feedback.

1.8 Additionally, a comprehensive programme of consultation activities was undertaken throughout the eight-week period, with engagement targeted towards a wide range of groups across the Royal Borough.

1.9 Online engagement activities were held in the form of four online webinars on the Local Plan's topics: Housing, Economy and Town Centres, Transport and Heritage, and Environment. In these webinars, policy leads ran through the main content of each policy before taking questions from residents. Webinars were recorded and posted online for any interested parties to view.

1.10 30 in-person engagement activities were also held in different locations and at varying times, including the Big Local Plan Community Assembly event which included a large number of residents, as set out in Table 1 below:

Table 1: List of Regulation 18 Draft Local Plan Consultation events and number of participants engaged

In-person engagement event	Numbers directly engaged
Multifaith Forum	6
Greenwich Advice Hub	10
Shrewsbury House	16
Woolwich Centre Library Chess Club drop-in	0

In-person engagement event	Numbers directly engaged
Woolwich Centre bus stop	30
Morrisons Thamesmead	17
Woolwich Centre Library Knit & Natter	11
Business forum	15
Woolwich Centre Library messy morning	13
Plumstead big issue group	4
Plumstead Library Knit & Natter	3
Plumstead disability group	7
Eltham Advice Hub	23
Abbey Wood Library Knit & Natter	3
Caribbean Social Forum	100
Kidbrooke Community Hub	5
Developers' forum	20
Kidbrooke local supermarket	5
Three Eltham Centre Library drop ins – two with planning team members	57
Five Woolwich Centre Library drop ins – two with planning team members	59
Three Plumstead Library drop ins – two with planning team members	18
Two Greenwich Centre Library drop ins – both with planning team members	3
Big Local Plan Community Assembly event	57

1.11 Finally, the Council held an in person “Big Local Plan Community Assembly” event at Woolwich Works, allowing residents to engage in more in-depth discussions about Local Plan issues. 119 people expressed interest in attending. In line with venue capacity limits, 60 participants were invited, of which 57 residents did attend. The Big Local Plan event was designed to provide attendees with an overview of the Draft Local Plan and support in-depth discussions to capture specific feedback for

Draft Local Plan policies. The event was organised as two parts: a discussion-based workshop focused on theme policies and an exhibition focused on place policies. A separate consultation report has been prepared for this specific event and is provided at Appendix A of this report.

Consultation responses

- 1.12 Responses to the consultation were received through a variety of channels, including the consultation hub, letters, emails, and completed questionnaires. Around 2,900 representations were received from around 700 commenters in total. Representations were made from a variety of stakeholders including individuals, developers, community groups, local businesses, statutory bodies and neighbouring local planning authorities.
- 1.13 A wide range of responses were received to the consultation, with the chapters that generated the most comments overall being:
- Housing;
 - Design and Heritage;
 - Environment; and
 - Places.
- 1.14 The Royal Borough of Greenwich took part in a Ministry of Housing, Communities and Local Government (MHCLG) pilot using AI to support faster local plan preparation and analyse consultation responses. The tool grouped and summarised representations by policy or theme, producing structured outputs for officers to review. It was used after the Regulation 18 Draft Local Plan consultation to create a filterable summary spreadsheet of responses. Planning officers still undertook a full and thorough review of all representations alongside the AI outputs.
- 1.15 A summary of consultation responses by topic is set out below, alongside the changes made to the Regulation 19 version of the Draft Local Plan as a result. Not all responses have led to changes, particularly where they relate to operational matters or fall outside the scope of planning policy. Issues such as design quality, accessibility and green infrastructure, which are reflected across multiple policies, are addressed through the wider Draft Local Plan, with amendments made in the relevant chapters where appropriate.

2. Places

Policy P1: Greenwich, Westcombe Park and Blackheath

- 2.1. Representations received in relation to the Greenwich, Westcombe Park and Blackheath Spatial Policy P1 emphasised the need to balance growth with heritage protection, infrastructure provision, and local needs. Significant concerns were raised regarding building height, scale, and cumulative impacts, particularly at Deptford Creek and Enderby and Morden Wharves, including potential harm to the Outstanding Universal Value, setting, and views of the Maritime Greenwich World Heritage Site and surrounding areas.
- 2.2. However, there was strong support for safeguarding wharves and supporting river-related uses, alongside enhancements to the Thames Path and riverfront. Respondents also supported a place-led approach to growth, highlighting the importance of ecological quality, biodiversity, and connectivity, particularly along Deptford Creek, and recognising the multifunctional role of the Thames and Creek in supporting sustainable freight, recreation, public access, and environmental enhancement.
- 2.3. Other respondents broadly supported a place-led approach to growth in sensitive historic environments, particularly along the Thames and Deptford Creek, while highlighting the importance of ecological quality, visual amenity, and cross-boundary consistency. Concerns were also raised regarding overdevelopment and infrastructure capacity, particularly in East Greenwich, including pressures on open space, play and sports provision, community facilities, and local services, as well as impacts on character and residential amenity, and the effectiveness of East Greenwich District Centre in meeting local needs. Further representations emphasised the importance of open space, biodiversity, and managing visitor pressures. In response, the policy has been strengthened to enhance criteria relating to ecology, nature conservation, and connectivity, alongside more robust place-based requirements for East Greenwich District Centre and improved provisions for green and blue infrastructure, public access, and environmental quality, including the protection of Blackheath's open heathland.
- 2.4. Concerns were also raised regarding overdevelopment and infrastructure capacity, particularly in East Greenwich, including pressures on open space, play and sports provision, community facilities, and local services, as well as impacts on character and residential amenity. Issues were also identified in relation to the effectiveness of East Greenwich District Centre in meeting local needs and the role of alternative retail areas. In response, the policy has been refined to include stronger place-based

criteria for East Greenwich District Centre, with clearer expectations for social infrastructure, active frontages, public realm, and community uses.

- 2.5. Further representations highlighted the importance of open space, biodiversity, and managing visitor pressures, alongside a proposal to promote an additional site for allocation. In response, the policy has been strengthened through enhanced wording on green and blue infrastructure, protection of Blackheath's open heathland, and improvements to public access and environmental quality, and one further site has been allocated within the spatial area.
- 2.6. Overall, representations supported the strategic direction of the policy while emphasising the need for development to be appropriately scaled, infrastructure-led, and responsive to its heritage, environmental, and community context. These matters have been addressed through subsequent refinements to the policy.

Policy P2: Greenwich Peninsula

- 2.7. Feedback on the Greenwich Peninsula Spatial Policy P2 was broadly supportive of the overall scale of development and regeneration proposed for the Greenwich Peninsula, particularly in relation to housing delivery. However, respondents raised concerns about how this growth would be supported, including the need to recognise a wider mix of residential uses, ensure adequate infrastructure provision, and accurately reflect existing and proposed uses on the Policies Map. The importance of supporting infrastructure and services—such as transport, community facilities, green space and recreation—was also emphasised, alongside concerns about safeguarding wharves and industrial infrastructure.
- 2.8. In response, the policy has been refined to strengthen clarity and ensure a more balanced approach to growth. This includes incorporating additional forms of residential accommodation, such as Purpose-Built Student Accommodation and co-living, and reinforcing the importance of infrastructure provision to support development. Supporting text has also been updated to recognise the Greenwich Peninsula Heat Network as essential infrastructure underpinning regeneration, growth and decarbonisation.
- 2.9. Further amendments address design and environmental considerations, including the Peninsula's specific context and microclimate. The policy now emphasises a coordinated approach to tall buildings to ensure they contribute positively to placemaking and townscape, while addressing impacts such as wind tunnelling and

microclimate. Overall, the revised policy provides a clearer and more robust framework to support sustainable and well-coordinated development.

Policy P3: Charlton

- 2.10. Representations received in relation to the Charlton Spatial Policy P3 and associated site allocations raised a number of key issues. These included a lack of alignment with the existing Charlton Riverside Masterplan SPD, insufficient consideration of safeguarded wharves, concerns regarding the adequacy of supporting infrastructure to accommodate the scale of development, limited recognition of connections to Charlton Village, and insufficient regard to the operational requirements of the Thames Barrier and the TE2100 Plan. Representations also highlighted the need to better recognise the importance of Charlton Athletic Football Club to the area.
- 2.11. In response, a range of refinements and clarifications have been made to the policy and site allocations. These include strengthened wording on engagement with the Environment Agency and explicit reference to the requirements of the Thames Barrier and the TE2100 Plan. The strategy for height has been clarified, emphasising a predominantly mid-rise form with carefully managed taller elements. Clearer expectations have also been introduced in relation to infrastructure delivery, including the requirement for developer contributions towards a new riverside bus route. Additional clarity has been provided on the protection and operation of safeguarded wharves, with boundaries corrected to reflect the Safeguarding Directions. Amendments to the supporting text also recognise the ongoing role and value of Charlton Athletic Football Club. Furthermore, the Vision has been refined to strengthen the role of a new local centre as a gateway between the riverside and Charlton Village, addressing concerns around connectivity and integration.

Policy P4: Woolwich

- 2.12. Representations received in relation to the Woolwich Spatial Policy P4 were generally supportive of the town centre-led approach and the recognition of Woolwich as a key location for inclusive and sustainable growth. However, many comments focused on the site allocations, with particular concern regarding the Woolwich Dockyard allocation (P4–W1) and the potential harm its regeneration could cause to established communities. Respondents suggested that redevelopment boundaries should avoid existing low-rise housing and instead focus on underutilised industrial land.

- 2.13. Wider feedback emphasised expectations for sustainable, car-free development and the careful management of height and massing to avoid overly dominant forms. Many respondents supported improved connectivity between the town centre, surrounding neighbourhoods, and the Thames Path, although concerns were raised about overdevelopment, population pressures, and a perceived divide between the Royal Arsenal and the wider town centre.
- 2.14. Representations also highlighted the need for stronger town centre stewardship, including the revitalisation of Powis Street and improved support for local businesses in the context of vacancies. Heritage and technical accuracy were recurring themes, including the omission of Repository Woods from heritage mapping and calls for the Woolwich Arsenal Heritage Centre to be returned to its former location to ensure public access and safety. Views on riverside regeneration were mixed, with some concerns that proposals could lead to privatised or gated riverfront spaces.
- 2.15. In response, Policy P4 has been strengthened to provide clearer expectations for sustainable, transit-oriented growth, reduced car dependency, and enhanced walking and cycling infrastructure. Greater emphasis has been placed on high-quality public realm, green infrastructure, and improved connectivity, including stronger links between the town centre and the Thames Path. Heritage protection has also been reinforced through clearer wording on conservation areas, key views, and the sensitive reuse of historic buildings.
- 2.16. Expectations for estate renewal and regeneration have been clarified to ensure benefits for existing communities, and the riverside section has been updated to emphasise the quality, safety, and continuity of the Thames Path. Additional amendments have been made to the site allocations, including Woolwich Dockyard (P4–W1), to improve clarity and ensure alignment with national and regional policy on estate regeneration. Two further sites have also been added within the spatial area following submissions promoting additional allocations.

Policy P5: Thamesmead and Abbey Wood

- 2.17. Representations received in relation to the Thamesmead and Abbey Wood Spatial Policy P5 were generally supportive of the emphasis on enhanced public transport, including the proposed DLR extension; however, concerns were raised that the policy did not fully reflect the strategic role and character of the River Thames. Comments also indicated a preference for development to comprise compact, mid-rise typologies to support effective placemaking and deliverability, and concerns

were also raised regarding the inclusion of a new Gypsy and Traveller site under Site Allocation P5–TA6 (Land west of Church Manor Way).

- 2.18. In response, refinements have been made to the policy, including more explicit references to a coordinated riverside strategy. Supporting text has also been added in relation to surface water management and engagement with relevant agencies.

Policy P6: Plumstead and Shooters Hill

- 2.19. Representations received on the Plumstead and Shooters Hill Spatial Policy P6 were largely from residents, with one representation from a stakeholder regarding a site allocation. These representations were mainly regarding the high street, and emphasised issues around anti-social behaviour, high street improvements and maintenance, heritage and public transport linkages, and many supported the policy. As a result, the issues were considered and a new clause on urban greening, and one on development supporting inclusive and sustainable communities, were added to the policy.

Policy P7: Eltham, Avery Hill, Coldharbour and New Eltham

- 2.20. Representations were received on the Eltham, Avery Hill, Coldharbour and New Eltham Spatial Policy P7 from residents and stakeholders regarding the site allocations within this spatial area, with a range of views expressed. Some respondents emphasised the need to protect local character and limit building heights accordingly, while others, including developers, indicated that greater heights could be accommodated, particularly on site P7–E1 (Merlewood House and Eltham Police Station).
- 2.21. In relation to site P7–E2 (Mecca Bingo), concerns were raised regarding the potential loss of Mecca Bingo as a valued community facility and asset of historic interest. Conversely, the landowner highlighted that the proposed allocation does not align with a recently submitted planning application for a supermarket.
- 2.22. Amendments have been made to the policy to better reflect the area's green character, while supporting development on underutilised land around transport hubs, in accessible locations, and within the town centre.

Policy P8: Kidbrooke and Middle Park

- 2.23. Representations received in relation to the Kidbrooke and Middle Park Spatial Policy P8, including comments from key stakeholders such as the Environment Agency, raised issues concerning the proposed site allocations and the limited reference within the policy to the River Quaggy and its corridor, the need for development to enhance and promote green infrastructure along the corridor, and the importance of recognising flood zones within site allocations.
- 2.24. In addition, significant concern was raised regarding the scale of proposed tall buildings and the harm this could cause to local character and amenity, the lack of supporting infrastructure to accommodate additional housing growth, and the loss of existing commercial uses and sports grounds across the identified sites.
- 2.25. Amendments have been made to the policy, including the addition of a paragraph strengthening the role and significance of the River Quaggy corridor, the inclusion of references to flood zones within site allocations, and minor wording refinements to improve clarity.

3. Housing

Policy H1: Meeting housing needs

- 3.1. Representations received in relation to Policy H1 reflected a range of views. While there was general support for increasing housing delivery, particularly on brownfield land and for affordable housing, concerns were raised regarding the scale of growth, its impact on infrastructure, the density and form of development, and the appropriateness of the housing target. Issues were also highlighted in relation to delivery, housing quality, and the extent to which local needs are addressed, alongside requests for clearer definitions and stronger wording.
- 3.2. Some respondents, including the Greater London Authority and Transport for London, raised specific issues regarding conformity with the London Plan, the treatment of past under-delivery, and the status of key infrastructure such as the DLR extension to Thamesmead.
- 3.3. In response, the policy has been amended to ensure general conformity with the London Plan, including maintaining the adopted housing target until 2028/2029 and incorporating cumulative past under-delivery of 9,060 homes into the target for the period 2030/31 to 2039/40 (annualised to 906 homes per year), resulting in a total

target of 49,630 homes over the plan period. The policy wording has been revised to improve clarity and consistency, including updates to terminology and infrastructure references.

Policy H2: Affordable Housing

- 3.4. Representations received in relation to Policy H2 reflected a range of views. While there was support for the ambition to deliver a high proportion of affordable housing, particularly social rent, and to increase overall supply, many respondents raised concerns regarding the proposed targets and approach. A key issue was the deliverability of the 50% target, with some considering it unrealistic in light of viability constraints, while others argued it should be higher or more rigorously applied. Concerns were also raised regarding the extent to which homes would be genuinely affordable, the balance between social and intermediate tenures, and the effectiveness of mechanisms such as the fast-track route. Further comments highlighted issues of clarity, flexibility, and alignment with the London Plan, alongside broader concerns relating to delivery, viability, and impacts on existing communities.
- 3.5. In response, a number of amendments have been made to Policy H2. Following comments from the Greater London Authority, the clause requiring 40% affordable housing to access the fast-track route where grant funding is used has been removed to ensure alignment with the London Plan. In response to representations from Places for London, the policy has been amended to clarify that the fast-track route may apply at lower affordable housing levels on public land where a portfolio approach has been agreed with the Mayor. Additionally, following comments from NHS Property Services, the reasoned justification has been updated to recognise the role of affordable housing for NHS staff, including reference to Key Worker Living Rent as an intermediate housing product.

Policy H3: Housing Mix

- 3.6. Representations received in relation to Policy H3 reflected a range of views, largely focused on achieving an appropriate balance between family-sized homes and smaller units. Many respondents expressed concern that the policy did not go far enough in delivering family housing, particularly three- and four-bedroom homes, and that an over-reliance on flats and smaller units would not meet local needs. In contrast, a number of stakeholders considered the policy to be overly prescriptive, particularly the requirement for a fixed proportion of three-bedroom market homes and raised concerns about potential impacts on viability and delivery. There were also calls for

greater flexibility to respond to site constraints, local context, and changing needs, as well as clearer recognition of how housing mix should vary by location.

- 3.7. In response, amendments have been made to Policy H3. The requirement for three-bedroom homes within market housing has been reduced from 25% to a minimum of 10% to address viability concerns, alongside additional wording to encourage the optimisation of family housing where appropriate. Furthermore, in response to comments from Places for London and other stakeholders, the reasoned justification has been updated to reflect London Plan guidance that a higher proportion of one- and two-bedroom homes may be more appropriate in locations with higher levels of accessibility, such as town centres.

Policy H4: Build to Rent

- 3.8. Representations received in relation to Policy H4 were submitted by both local residents and wider stakeholders, with differing priorities expressed. Stakeholders, including the Mayor of London, Places for London, and a number of developers, raised concerns regarding the requirement for low-cost rent to be provided within separate cores or blocks, citing potential impacts on scheme viability and the risk of conflict with London Plan Policy H11. In response, although the requirement has been retained, amendments have been made to the wording to improve clarity and ensure alignment with the London Plan.
- 3.9. Representations from residents generally raised concerns that the policy may encourage the expansion of the rental market at the expense of owner-occupation, potentially contributing to a more transient population and reducing community cohesion, as well as pricing out existing residents. However, the Council wishes to promote a range of housing types including Build to Rent schemes, and the policy has been retained. It continues to include requirements for low-cost rental provision to meet the borough's need for affordable housing, ensuring that a proportion of homes delivered through this model are more affordable than standard Build to Rent units.

Policy H5: Large-scale purpose-built shared living

- 3.10. Representations received in relation to Policy H5 were submitted by both local residents and wider stakeholders, with a slightly higher proportion from residents. Several stakeholders expressed support for the draft policy but raised concerns regarding the requirement for conventional housing to be provided on larger sites, as

well as the use of wording relating to the ‘overconcentration’ of schemes. In response, the wording on conventional housing provision has been refined to allow for greater flexibility where design or viability constraints may limit delivery. The approach to managing overconcentration is considered to align with London Plan policy and guidance and has therefore been retained.

- 3.11. Representations from residents acknowledged that large-scale purpose-built shared living schemes can provide an alternative to Houses in Multiple Occupation (HMOs) and help protect family housing stock. However, concerns were raised that such schemes should not adversely affect residential character, local housing mix, or community cohesion, and that rents associated with these developments are often high. The policy’s approach to managing overconcentration, alongside supporting text discouraging the provision of ‘luxury’ amenities, has been retained to help address these concerns.
- 3.12. To improve clarity and usability of the Local Plan, the policy has also been combined with the policy addressing conversions to Houses in Multiple Occupation, reflecting the similarities between these forms of accommodation as types of housing with shared facilities.

Policy H6: Purpose-built student accommodation

- 3.13. Representations received in relation to the Purpose-Built Student Accommodation (PBSA) Policy H6 raised a range of views. Concerns were expressed regarding the level of support for PBSA in the Plan, particularly in light of uncertainty around future student demand, the concentration of schemes in town centre locations, and the extent to which such development would contribute to meeting wider housing needs. Issues were also raised regarding the prioritisation of students from local institutions, the potential for overconcentration, and the risk of future conversion to poor-quality accommodation.
- 3.14. In response, the approach to managing overconcentration has been retained, as it is considered to align with London Plan policy and guidance. The requirement for conventional housing provision on larger sites has also been retained, subject to viability considerations. The policy continues to direct PBSA to well-connected locations in order to support sustainable development. Amendments have, however, been made to the wording on nomination agreements to allow for a broader London-wide catchment, ensuring compliance with London Plan requirements. In addition, supporting text has been updated to include a cascade mechanism for

direct lettings, prioritising take-up by Higher Education Providers based in Royal Greenwich or nearby before extending to those located further afield.

Policy H7: Sub-divisions and conversions to Houses in Multiple Occupation (HMOs)

- 3.15. Representations received in relation to Policy H7 were largely negative, although there was some support for strengthening controls on HMOs. Many respondents raised concerns about the growth and concentration of HMOs and their perceived impacts on neighbourhood character, including noise, waste, parking pressure, and anti-social behaviour. A key theme was the loss of family housing and the effect on community cohesion. There were frequent calls for stricter controls, including higher minimum property sizes, tighter limits on concentration, often at street level and stronger enforcement. Some respondents also acknowledged the role of HMOs in providing more affordable housing, provided they are well managed and appropriately located, particularly in areas with good transport accessibility.
- 3.16. In response, Policy H7 has been strengthened to provide greater control over the development of HMOs. The minimum original property size threshold for conversion has been increased from 90 sqm to 130 sqm, reflecting the need to protect small family homes. The policy now also includes a requirement for HMOs to be located in areas with good transport accessibility. In addition, the definition of overconcentration has been revised from a ward-based approach to a street-level assessment, reflecting concerns that impacts are often more localised.
- 3.17. To improve the clarity and legibility of the Local Plan, and to reflect the similarities between related housing products, the policy on Houses in Multiple Occupation has been combined with the policy on Large-Scale Purpose-Built Shared Living in the Regulation 19 Draft Local Plan. For consistency, policies relating to sub-divisions have also been incorporated into the small sites policy.

Policy H8: Supported and Specialist Accommodation

- 3.18. Representations received in relation to Policy H8 were generally supportive of the provision of housing for groups with specific physical and mental needs, including older people, with some support also expressed for smaller homes for older residents. However, some respondents highlighted the need for clearer mechanisms to manage potential impacts on neighbouring residents, although this was considered to be addressed through existing requirements for management plans.

- 3.19. The NHS also highlighted the need to address potential pressures on local health services and requested the inclusion of mitigation measures, alongside suggestions to improve the provision of suitable outdoor amenity spaces for older residents. In response, amendments have been made to the policy and supporting text to reflect these considerations.

Policy H9: Small sites

- 3.20. Representations received in relation to Policy H9 reflected a range of views. Some respondents raised concerns that development on small sites could erode local character and result in harmful impacts, while others highlighted the potential cumulative pressure such developments may place on infrastructure.
- 3.21. In response, amendments have been made to the policy to strengthen requirements for development to positively reflect local character and avoid the overdevelopment of sites. Additional provisions have also been introduced to secure the necessary infrastructure, or appropriate financial contributions, to mitigate the impacts of development and ensure proposals are acceptable in planning terms.
- 3.22. The section relating to extensions has been removed from the policy, with a new standalone policy introduced to address extensions in response to the representations received.

Policy H10: Gypsy and Traveller Accommodation

- 3.23. Representations received in relation to Policy H10 reflected a range of views. While some respondents supported the provision of Gypsy and Traveller accommodation and welcomed the aim to deliver appropriate and inclusive sites, a number of objections were raised, particularly in relation to the proposed site allocation. These concerns focused on potential impacts on community cohesion, safety, and local amenity. A smaller number of representations also highlighted the need for clearer evidence of need, improved site design, and appropriate location and management of sites. It should also be noted that a petition from local residents opposing the proposed Gypsy and Traveller site at Land to the West of Church Manor Way was submitted following the close of the Regulation 18 Draft Local Plan consultation period.
- 3.24. In response, amendments have been made to ensure alignment with the London Plan. Following comments from the Greater London Authority, the policy has been updated to clearly set out the borough's pitch requirements over the plan period

and how these needs will be met. The overall approach to meeting identified need is informed by the borough's evidence base and reflects relevant national policy and guidance.

Policy H11: Housing Quality

- 3.25. Representations received in relation to Policy H11 resulted in a series of targeted refinements to ensure the policy remains deliverable, flexible, and aligned with national and regional policy, while continuing to secure high-quality homes. Concerns regarding the application of daylight and sunlight standards on constrained urban sites led to revised wording requiring development to maximise the number of dwellings receiving direct sunlight, rather than requiring all homes to meet prescriptive thresholds. This responds to feedback that rigid standards are not always achievable in dense or heritage-sensitive contexts and better reflects recognised daylight and sunlight considerations.
- 3.26. The approach to dual aspect dwellings has also been clarified. While the policy continues to prioritise dual aspect homes, it now more clearly sets out the circumstances in which single aspect dwellings may be acceptable, subject to achieving adequate standards of ventilation, daylight, privacy, and overheating mitigation. This responds to representations seeking greater flexibility, in line with London Plan guidance and viability considerations.
- 3.27. Accessibility requirements have been strengthened through clearer expectations for compliance with accessibility standards, alongside more detailed guidance on the design of wheelchair user dwellings, including layout, storage, and circulation. These changes reflect representations calling for stronger inclusive design standards, while ensuring proportionality across different development types.
- 3.28. Further refinements have been made to improve clarity around waste storage, natural light, and internal amenity. The policy now places greater emphasis on maximising natural light while balancing passive heating and cooling, responding to concerns relating to overheating and climate-responsive design. Requirements for waste and recycling storage have also been clarified to address practical management considerations in flatted developments.
- 3.29. External amenity and play space standards have been strengthened through clearer expectations for private and communal space, including minimum dimensions and the circumstances in which alternative provision or financial contributions may be

required. This reflects representations calling for improved outdoor space, biodiversity-enhancing features, and inclusive play provision.

- 3.30. Overall, the amendments to Policy H11 respond to representations by improving clarity, flexibility, and deliverability, while maintaining strong expectations for high-quality, accessible, and sustainable homes. The updated policy more comprehensively addresses issues raised in relation to internal standards, overheating, inclusivity, external space, and the practical application of design requirements.

4. Economy

Policy E1: Inclusive Economy

- 4.1. Representations received in relation to Policy E1 were generally supportive of the overall approach to economic growth, including the protection and intensification of employment land, the provision of modern workspace for SMEs, and the emphasis on local employment, skills, and training. However, some respondents raised concerns regarding the deliverability of employment outcomes and the absence of reference to community wealth building and co-operative models.
- 4.2. After consideration, amendments have been made to the supporting text. Additional wording has been included in the reasoned justification to clarify that the detailed application of Policy E1 is set out in subsequent policies within this chapter. Further clarification has also been provided in Policy E2 to confirm that identified industrial needs will be met primarily through the intensification and optimisation of existing industrial land. In addition, the chapter introduction has been updated to include support for forms of enterprise that help retain wealth locally.

Policy E2: Protected Industrial Land

- 4.3. Representations received in relation to Policy E2 were broadly supportive of the protection of Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), as well as the policy's support for sustainable freight movement. However, concerns were raised regarding the clarity of the policy, the need to better define appropriate uses, and the potential tension arising from the inclusion of protected industrial land within residential-led site allocations.
- 4.4. In response, amendments have been made to the policy and supporting text to provide greater clarity on appropriate uses within SIL and LSIS and to ensure alignment with London Plan definitions. Relevant site allocations have also been updated to reflect their LSIS designation where applicable.

Policy E3: Non-designated Employment Sites

- 4.5. Representations received in relation to Policy E3 reflected a range of views. Some respondents considered the policy to be overly restrictive, arguing that it does not allow sufficient flexibility for employment sites to transition to alternative uses where long-term viability is limited. Concerns were also raised regarding the

application of marketing requirements and the circumstances under which alternative uses would be permitted.

- 4.6. Other respondents supported the policy's objective of protecting viable non-designated employment sites and ensuring no net loss of employment floorspace.
- 4.7. In response, further clarification has been provided within the supporting text regarding the expectations for marketing evidence and the criteria used to assess proposals involving the loss of employment uses.

Policy E4: Delivering Inclusive Growth

- 4.8. Representations received in relation to Policy E4 were generally supportive of the principle of requiring affordable workspace; however, concerns were raised regarding the lack of detail and the potential impact on scheme viability.
- 4.9. In response, the policy has been amended to specify the proportion of floorspace to be provided as affordable workspace, alongside the percentage discount to be applied to market rents. The supporting text has also been strengthened to provide further clarity on delivery and implementation.

Policy E5: Local Employment, Skills and Training

- 4.10. Representations on Policy E5 were generally supportive of the policy's aim to secure local employment, skills and training opportunities.

Policy E6: The Visitor Economy

- 4.11. Respondents to Policy E6 were generally supportive of the criteria relating to the provision of public toilets but queried its inclusion within the visitor economy. Other responses sought stronger support for arts and cultural uses, enhanced protection for public houses, including a preference for a standalone policy, and the inclusion of criteria relating to short-term lets alongside hotels.
- 4.12. In response, the content of Policy E6 has been relocated to the Town Centres chapter. Additional criteria have been introduced to manage short-term visitor accommodation, and the supporting text has been expanded to strengthen the protection of existing arts and cultural uses. A new standalone policy on public

houses has been prepared, while public toilets are now addressed within the Social and Community Infrastructure policy within the same chapter.

- 4.13. Some representations also raised concerns regarding the clarity and consistency of terminology used throughout the chapter. These have been addressed through targeted amendments to policy wording, expanded supporting text, and additional clarification within the chapter introduction and glossary.

5. Town Centres

Policy TC1: Supporting the Network and Hierarchy of Centres

- 5.1. Representations received in relation to Policy TC1 raised concerns about declining retail diversity, over-concentration of certain uses, and the ability of centres to meet both local and visitor needs. Issues were also highlighted regarding public realm quality, accessibility, active travel, and the dominance of car-based movement, alongside concerns about the clarity of the hierarchy and recognition of different centre roles.
- 5.2. Some respondents supported the overall “centres first” approach and the policy’s aim to maintain vibrant and viable centres, including the protection of active frontages and the focus on balanced uses.
- 5.3. In response, the policy has been revised to provide clearer direction on Primary Shopping Areas, strengthen the role of the hierarchy through the inclusion of Table TC1, and place greater emphasis on balanced uses, adaptability, and cross-boundary coordination. Additional clarity has also been introduced in relation to the role of different centres, including Local and Neighbourhood Centres, and the management of growth and change across the network.

Policy TC2: Managing edge-of-centre and out-of-centre uses

- 5.4. Representations received in relation to Policy TC2 were broadly supportive of the ‘town centres first’ approach, including the application of the sequential test and impact assessment to direct development to designated centres, and the presumption against further out-of-centre retail and leisure growth at Charlton Riverside. However, concerns were raised, particularly by the retail sector, that the proposed retail impact threshold was too low and not aligned with national policy or market practice, with potential disproportionate impacts on smaller proposals.

- 5.5. In response, the policy has been amended to increase the impact threshold to 350 sqm, align the impact test with the NPPF “significant adverse impact” standard, and provide greater clarity on its application, including to hotel uses. The policy retains a strong sequential approach and the presumption against uncoordinated out-of-centre development, with further clarification provided regarding the requirement for proposals at Charlton Riverside to form part of a comprehensive, masterplanned approach.

Policy TC3: Culture, Evening and Night-Time Economy Uses

- 5.6. Consultation feedback on Policy TC3 was generally supportive of strengthening the borough’s cultural and evening economy, particularly the protection of existing cultural facilities and encouragement of independent and diverse leisure uses. At the same time, respondents emphasised the importance of ensuring the offer is inclusive, not overly focused on alcohol-led activity, and that impacts on neighbouring residential areas; such as noise and disturbance are effectively managed.
- 5.7. As a result, the policy has been refined to promote a broader and more balanced mix of evening and night-time economy uses, including arts, cultural and community-focused activities, alongside enhanced protection for existing venues in line with the agent of change principle. Greater clarity has also been introduced to ensure new development supports a diverse, safe and inclusive environment while remaining compatible with surrounding uses.

Policy TC4: Markets, events and pop-up spaces

- 5.8. Feedback on Policy TC4 was broadly supportive of the role of markets, events and pop-up activity in contributing to town centre vitality, local character and the activation of vacant or underused spaces. Established markets in Greenwich and Woolwich were highlighted as important heritage assets, although concerns were raised regarding management, quality, and potential impacts on the public realm, including waste and the overall visitor experience.
- 5.9. In light of this, the policy has been refined to strengthen the protection and enhancement of existing markets, including recognition of their heritage and identity. Clearer criteria have been introduced for new markets and temporary activity to ensure they complement existing provision, are accessible, support health and wellbeing, and maintain public realm quality while minimising adverse impacts.

- 5.10. To improve clarity and reduce duplication, Policy TC4 has also been combined with the former Policy TC5 on meanwhile uses, reflecting the close alignment between these areas.

Policy TC5: Meanwhile uses

- 5.11. Consultation responses were generally supportive of meanwhile uses as a means of activating vacant sites, supporting local enterprise, and contributing to regeneration and placemaking. However, respondents highlighted the need for clearer processes to access meanwhile opportunities and safeguards to ensure they do not undermine long-term development or strategic functions, including safeguarded wharves.
- 5.12. In light of this feedback, the policy has been refined to clarify the role of meanwhile uses in supporting regeneration, innovation and reducing vacancy, alongside strengthened criteria to ensure they deliver clear community, cultural and economic benefits without prejudicing future development. References to relevant London Plan policy have also been incorporated.
- 5.13. Further clarity has been provided through the retention of Management Plan requirements to address potential impacts, as well as expanded supporting text on the Council's role in facilitating meanwhile uses. Overall, the policy establishes a more robust and coherent framework while ensuring alignment with long-term objectives.

Policy TC6: Managing Hot Food Takeaways and Gambling Uses

- 5.14. Consultation feedback on Policy TC6 showed broad support for stronger controls on hot food takeaways and gambling uses, particularly in relation to public health, community wellbeing and town centre vitality. Respondents endorsed tighter restrictions on clustering and proximity to schools, but also raised concerns about enforcement and the impacts of delivery activity on the public realm, including congestion, safety and residential amenity.
- 5.15. As a result, the policy has been refined to improve clarity and effectiveness, including clearer application of concentration thresholds and strengthened design and operational requirements to better manage impacts such as delivery activity. A requirement for Health Impact Assessments has also been introduced to ensure that health considerations are more clearly embedded in decision-making.

- 5.16. Overall, the revised policy establishes a more robust and clearly expressed framework to manage these uses and support healthier, safer and more balanced town centres.

Policy TC7: Social and Community Infrastructure

- 5.17. Consultation responses on Policy TC7 primarily raised concerns about whether existing and planned social and community infrastructure would be sufficient to support the level of growth proposed in the Local Plan, particularly in relation to schools and healthcare provision.
- 5.18. In response, minor refinements have been made to improve clarity. Details of the existing and planned infrastructure required to support development will be set out in the Infrastructure Delivery Plan (IDP), to be published alongside the Regulation 19 consultation documents. Some representations also sought to expand the list of community facilities included in the policy to specify additional uses; however, no changes have been made, as the uses referenced are already captured within the existing categories. Supporting text has also been updated to relocate the section on public toilets into this policy to ensure a coherent approach to social and community infrastructure provision.

6. Design and Heritage

Policy DH1: Principles for High Quality Design

- 6.1. Feedback on Policy DH1 highlighted concerns about the quality and character of new development, including perceptions of generic design, limited responsiveness to local context and heritage, and the impacts of higher-density schemes on townscape and human-scale environments. Respondents emphasised the importance of context-led design, high-quality public realm, and inclusive, well-functioning places, while also expressing support for the policy's ambition to achieve design excellence.
- 6.2. In light of this, the policy has been refined to strengthen expectations around design quality and delivery. This includes amendments to clarify engagement with the Council's Design Review Panel, the introduction of a new section on safety and crime prevention, and a requirement for Health Impact Assessments for major development. Collectively, these changes provide a clearer and more focused framework to support the delivery of safe, inclusive and high-quality places.

Policy DH2: Tall Buildings

- 6.3. Feedback on Policy DH2 raised concerns about the height, scale and impacts of tall buildings, including effects on character, heritage, views, skyline and amenity. Many respondents considered the policy to be overly permissive and sought clearer limits, while others supported the plan-led approach but requested greater clarity on appropriate heights, definitions and alignment with London Plan Policy D9.
- 6.4. In light of these comments, the policy has been refined in a targeted and proportionate manner to improve clarity and strengthen decision-making. This includes revisions to Table DH1 to introduce clearly defined height ranges for Tall Building Zones and Limited Opportunity Zones, as well as upper thresholds for site allocations. Additional policy wording clarifies that these ranges do not imply acceptability in principle—clarifying that the identification of height ranges does not imply that development up to those heights will be acceptable in principle, and confirming that proposals will be assessed on a case-by-case basis—and that all proposals must demonstrate design suitability in urban design, heritage and townscape terms.
- 6.5. Amendments have also been made to Figure DH1 (Tall Buildings Map) to improve clarity between the operation of the Limited Opportunity Zone and specific site allocations, ensuring stronger alignment between mapped designations and site-specific policy. Further changes include renaming certain mapped designations to better reflect their locations, clarifying expectations around public benefits, explicitly requiring compliance with London Plan Policy D9, and setting out a clearer approach for proposals outside designated areas, emphasising a masterplan-led and site-specific design approach.
- 6.6. Overall, these changes provide a more clearly expressed and spatially specific framework, maintaining the plan-led approach while strengthening certainty around appropriate building heights and the assessment of tall building proposals.

Policy DH3: Public Realm

- 6.7. Feedback on Policy DH3 was generally supportive of efforts to improve the quality of the public realm, with respondents emphasising the importance of attractive, well-maintained and accessible spaces. Key concerns related to safety, including crime and anti-social behaviour, as well as the need to enhance walking and cycling routes, green infrastructure and overall connectivity. Some respondents also raised issues

around ongoing maintenance and management, potential loss of green space, and the need to prioritise essential improvements over features such as public art.

- 6.8. In light of these comments, the policy has been refined to strengthen its approach to safety and security. This includes amendments to require engagement with Designing Out Crime Officers and Counter Terrorism Security Advisors on major developments, alongside references to relevant national guidance on security and public realm design. Additional wording has been introduced to ensure that new development incorporates measures to deter crime and improve surveillance, while also clarifying that public art is encouraged but should not take precedence over essential infrastructure such as planting and green provision. Issues relating to design quality, accessibility and green infrastructure are addressed across the wider Local Plan and are intended to be considered alongside this policy.

Policy DH4: Heritage Assets

- 6.9. Feedback on Policy DH4 was broadly supportive of the protection of heritage assets, but raised concerns about the need for clearer and more robust policy wording. Respondents sought greater clarity on how harm is defined, assessed and justified, alongside stronger controls over demolition and clearer differentiation in the treatment of designated and non-designated heritage assets.
- 6.10. In response, the policy has been refined to improve clarity and alignment with national policy. This includes clearer distinction between substantial harm, total loss of significance and less than substantial harm, alongside strengthened wording on demolition, confirming that the loss of listed buildings or elements contributing to their significance will be treated as substantial harm and resisted except in wholly exceptional circumstances. Additional clarity has also been introduced on conserving and enhancing heritage significance, including impacts on character, setting and views, and on the role of Conservation Area Appraisals and Management Plans in decision-making.
- 6.11. Further amendments address archaeology and non-designated heritage assets, introducing more explicit expectations for assessment within Areas of High Archaeological Potential and confirming a proportionate but robust approach to the conservation of non-designated assets. Overall, the revised policy provides greater clarity, consistency and alignment with national policy in the assessment and management of heritage assets.

Policy DH5: Maritime Greenwich World Heritage Site

- 6.12. Feedback on Policy DH5 was broadly supportive of strong protection for the Maritime Greenwich World Heritage Site (WHS), particularly its Outstanding Universal Value (OUV), key views, skyline and wider setting. Respondents called for clearer and more robust requirements for assessing impacts, including within the buffer zone and wider setting, alongside the use of established methodologies such as Heritage Impact Assessments. Concerns were also raised regarding development pressures, including tall buildings and cumulative impacts, and the need to better safeguard visual integrity.
- 6.13. In response, the policy has been refined to strengthen clarity and robustness. This includes enhanced requirements for Heritage Impact Assessments, clearer expectations to assess impacts on the attributes, authenticity and integrity of OUV, and stronger emphasis on avoiding or minimising harm, including cumulative effects. Supporting text has been updated to reference UNESCO guidance and methodologies, alongside clearer links to the World Heritage Site Management Plan and London View Management Framework to protect key views and skyline.
- 6.14. Additional amendments provide clearer direction on public access, interpretation and visitor experience, alongside updates to ensure alignment with current guidance. Overall, the revised policy maintains the overarching approach to protecting, conserving and enhancing the OUV of the WHS while providing a clearer and more robust framework for managing change and assessing impacts.

Policy DH6: Strategic and Local Views

- 6.15. Feedback on Policy DH6 was generally supportive of protecting strategic and local views, but highlighted the need for a stronger and clearer policy framework. Respondents called for additional local views to be identified—particularly from locations such as Greenwich Park, Blackheath and Shooters Hill—and for improved mapping and clarity. Concerns were also raised about the impact of tall buildings on important views, skyline and visual character, especially in sensitive heritage locations and along the Thames.
- 6.16. In response, the policy has been refined to strengthen clarity, robustness and spatial accuracy. This includes a comprehensive review of designated local views, supported by updated mapping and the introduction of Table DH2, alongside the removal of one view that no longer met the threshold for designation. Policy wording has been

strengthened to emphasise the protection of composition, character and visual integrity, with clearer requirements to assess scale, height, massing and cumulative impacts. Additional clarity has also been introduced in relation to conservation areas and the role of Townscape and Visual Impact Assessments.

- 6.17. All other aspects of the policy, including the protection of strategic views through the London View Management Framework, remain consistent. Overall, the revised policy provides a clearer and more robust framework for protecting and enhancing strategic and local views.

Policy DH7: Shopfronts, advertisements and signage

- 6.18. Feedback on Policy DH7 was generally supportive of improving shopfronts, signage and town centre design, particularly where this enhances local character and creates more attractive and vibrant streets. Respondents emphasised the importance of high-quality, consistent design and the retention of historic features, alongside concerns about poor-quality shopfronts, intrusive signage, security shutters and visual clutter, and their impacts on amenity, heritage and the pedestrian environment.
- 6.19. In response, the policy has been refined to strengthen clarity and design expectations. This includes more detailed criteria for shopfronts and signage, covering materials, proportions, accessibility and active frontages, alongside stronger controls on security features and illumination to protect amenity, character and safety. Additional provisions have been introduced to manage advertisements and freestanding structures, including digital displays, with clearer criteria addressing siting, cumulative impacts and public realm considerations.
- 6.20. Further emphasis has been placed on responding to local context and heritage, including conservation areas and the World Heritage Site setting, supported by expanded guidance on temporary and construction-related signage. Wider issues raised, such as business diversity and vacancy, fall outside the scope of the policy and have not resulted in direct changes.

Policy DH8: Thames Policy Area

- 6.21. Feedback on Policy DH8 was mixed, with general support for enhancing the Thames corridor alongside concerns about how the policy would be implemented. Respondents emphasised the importance of delivering a high-quality, continuous and genuinely accessible Thames Path, protecting public access, and achieving a better

balance between development, industrial uses and recreation. Concerns were also raised in relation to development pressure along the riverfront and the need to strengthen biodiversity, flood risk management and environmental resilience.

- 6.22. In response, the policy has been refined to provide greater clarity and flexibility in managing competing riverside uses. This includes strengthened policy and supporting text emphasising a continuous, safe and accessible Thames Path, supported by the preparation of a Thames Path Strategy to guide delivery and connectivity. Additional clarity has been introduced to recognise a balanced mix of riverfront uses, including recreational and leisure activities alongside the role of the Thames as a working river.
- 6.23. Further amendments strengthen the policy's approach to environmental resilience and design quality, including clearer references to strategic frameworks such as the Thames Estuary 2100 Plan and South East Marine Plan, and enhanced emphasis on flood risk, biodiversity, habitat protection and river safety. Overall, the revised policy provides a more coherent and flexible framework to support a high-quality, accessible and resilient Thames corridor.

7. Environment

Policy EN1: Green and Blue Infrastructure

- 7.1. Representations received in relation to Policy EN1 were generally supportive of the protection and enhancement of green and blue infrastructure, including the retention of green spaces and creation of connected corridors; however, concerns were raised regarding the potential loss of trees, the strength of biodiversity measures, and long-term management arrangements. The Marine Management Organisation and Environment Agency also sought clearer references to relevant policy frameworks and stronger support for connected green and blue infrastructure networks, while some respondents raised concerns regarding the viability of requirements for allotments and food growing spaces.
- 7.2. As a result, the policy has been amended to incorporate the requests of the Marine Management Organisation and the Environment Agency, including the addition of references to relevant policy frameworks and clearer wording on connected green and blue infrastructure networks. Further changes include strengthened support for borough-wide networks, enhanced provisions for tree protection, and additional clarification on the provision and operation of food growing spaces, with requirements focused on major development to address viability concerns. A

dedicated section on blue infrastructure has also been introduced to strengthen the protection and enhancement of these assets.

Policy EN2: Open Space

- 7.3. Representations received on Policy EN2 were primarily concerned with the protection of open spaces, including Metropolitan Open Land and smaller local green spaces, with objections to their potential loss and concerns about changes to designated sites. There was strong support for not only retaining but also enhancing and expanding open space provision, particularly in areas of deficiency and higher-density development, including improved access to existing spaces. Respondents also highlighted the need for additional allotments, play areas, and sports facilities, as well as the reuse of underutilised or neglected land for recreation, biodiversity, and community uses. Some developers and landowners, including the Defence Infrastructure Organisation, sought amendments to ensure policy requirements would not constrain development on specific sites, particularly in relation to impacts on the character and visual amenity of Metropolitan Open Land.
- 7.4. After consideration, the policy was considered sufficiently robust to protect open spaces; however, additional wording has been included to strengthen requirements relating to the quality of public open space and to maximise provision in areas of deficiency. Existing designations have been retained, reflecting the findings of the supporting evidence base, including the Playing Pitch Strategy and the Open Space and Nature Infrastructure Study.

Policy EN3: Biodiversity

- 7.5. Representations received in relation to Policy EN3 were generally supportive of the protection and enhancement of biodiversity, including the delivery of biodiversity net gain, safeguarding of Sites of Importance for Nature Conservation, and the provision of green and blue infrastructure. Respondents emphasised the importance of retaining existing habitats, particularly mature trees and established ecosystems, alongside securing measurable biodiversity gains through development and prioritising on-site enhancements.
- 7.6. Some respondents raised concerns regarding the level and delivery of BNG, including differing views on targets above the statutory minimum, the effectiveness of monitoring and long-term management, and the reliance on off-site provision or biodiversity credits. Suggestions were also made to strengthen policy wording,

improve ecological connectivity through green corridors and river restoration, and incorporate additional habitat features such as bird and bat boxes.

- 7.7. Following consideration of these representations, the policy and supporting text have been strengthened. This includes additional detail on BNG monitoring, clearer guidance on contributions to ecological networks, and expanded references to designated sites and priority habitats. A new section has also been introduced on ecological integration within development, covering biodiversity features such as swift bricks and bat boxes, enhancements to blue infrastructure, and provision in areas with limited access to nature.
- 7.8. While the statutory BNG requirement remains at 10%, this approach is considered consistent with national and regional policy and supports improved biodiversity outcomes and nature recovery through development.

Policy EN4: Air Quality

- 7.9. Representations received on Policy EN4 raised issues surrounding odour impacts, and this has now been moved from Policy EN5 to EN4, with improved clarity and strengthened requirements to respond to representations seeking more robust regulation of air quality impacts. Feedback from key stakeholders, including the Environment Agency, has informed wording changes to ensure the policy more effectively addresses air quality concerns.

Policy EN5: Local Environments

- 7.10. Comments on Policy EN5 raised the importance of protecting and enhancement of local environments. The policy has been strengthened overall, reflecting consultation responses and a clear intention to enhance the protection and quality of local environments.

Policy EN6: Flood Risk and Sustainable Drainage

- 7.11. Representations received on Policy EN6 showed strong support for sustainable drainage, which is now addressed through a standalone policy to improve legibility and allow for greater detail. In relation to flood risk, residents and wider stakeholders were broadly supportive of the policy direction. Advice from the Environment Agency and local residents has been incorporated, resulting in a more comprehensive framework for managing flood risk and vulnerability.

Policy EN7: Strategic Waste Management

- 7.12. Representations on Policy EN7 from key stakeholders, including the Environment Agency and the Port of London Authority, have informed amendments to this policy. Changes have been made to ensure that it addresses all waste streams, requires new or expanded waste facilities to be enclosed, and encourages the use of rail or river for the transportation of waste.
- 7.13. Supportive representations were also received in relation to the collaborative approach to waste management and the safeguarding of waste sites. A number of representations raised concerns regarding issues such as fly-tipping and household waste collections; however, these matters fall outside the scope of the Local Plan.

8. Climate Emergency

- 8.1. There were representations that the approach of climate emergency policies is not consistent with national policy. The Council notes the new draft NPPF published in December 2025 does not encourage LPAs to set local quantitative standards in energy efficiency, although this draft NPPF has not yet been adopted. The Royal Borough of Greenwich Draft Local Plan has been prepared using the adopted version of the NPPF as published on 12 December 2024 and amended on 7 February 2025 under the 'legacy' system of plan-making.

Policy CE1 Climate resilient and Net Zero design principles:

- 8.2. Representations on Policy CE1 pointed out that the water efficiency requirements in Policy CE1 were not compliant with London Plan policies as the requirement should apply for all developments. This has been revised to align with London Plan requirements in the Regulation 19 Draft Local Plan version.
- 8.3. Some respondents expressed that the BREEAM requirements are inflexible and that the BREEAM methodology receives frequent updates. In response, the Council has changed the BREEAM requirement of major non-residential schemes to 'Excellent' from 'Outstanding'.

Policy CE2: Operational carbon and energy balance

- 8.4. Some representations on Policy CE2 argued that the Energy Use Intensity targets in Policy CE2 are too restrictive and the renewable energy generation targets are difficult to achieve. The targets in this policy are based on London-wide feasibility study commissioned jointly by London boroughs and published by Etude and other consultancies in 2022. The targets are a novel approach in mitigating climate change. Additional viability analysis is commissioned as part of the Regulation 19 draft.

- 8.5. Some respondents also said the plan provides no evidence or actions to meet the operational carbon (EUI/SHD) targets set out in Policy CE2. Across the chapter, the supporting text has been improved to include more guidance for applicants to refer to and more reference to evidence papers.

Policy CE3: Decentralised energy

- 8.6. Representations directed at Policy CE3 asked for more information and direct language in requiring developments to connect to district heating networks where available. The Council agrees this would encourage low carbon heating and could contribute to compliance with other policies in the Draft Local Plan, and therefore relevant wording changes have been made in this regard.

Policy CE4: Whole Life Carbon and Circular Economy

- 8.7. Representations on Policy CE4 were mixed. Some respondents supported Whole-Life Carbon and Circular Economy requirements, including embodied carbon limits, while others questioned their deliverability and the lack of clarity on implementation and independent assessment. A small number of representations opposed the policy, whereas others expressed general support.
- 8.8. The policy has been amended to update the Embodied Carbon Limits based on the most up-to-date RICS guidance and explicit reference made to following this and Mayor of London guidance on Whole Life Carbon Assessments.

Policy CE5: Retrofitting and existing buildings

- 8.9. Representations on Policy CE5 reflected a range of views. Some respondents supported the policy's emphasis on retrofitting and improving energy performance, including in existing and historic buildings, while others raised concerns regarding implementation, funding, and potential impacts on residents, including costs and noise from technologies such as heat pumps.
- 8.10. Comments also highlighted the need for clearer and more consistent targets, stronger evidence to support retrofit approaches, and greater clarity on independent assessment and verification. Further suggestions included increased support for household-level retrofitting, funding mechanisms, and guidance for homeowners and developers. Concerns were also raised regarding the balance between retrofit and demolition, particularly in relation to embodied carbon impacts.

- 8.11. The policy has been amended to include the requirement to submit a proportionate retrofit strategy, and provide clarity that retrofit measures should not harm the significance of heritage assets.

9. Transport

Policy T1: Active Travel and Cycle Parking

- 9.1. Feedback on Policy T1 was mixed. Many respondents supported the promotion of walking, cycling and improved active travel networks, particularly to enhance connectivity and reduce reliance on cars. However, concerns were raised about deliverability, including the practicality of cycle parking standards, the design and safety of routes, impacts on parking and traffic, and whether the needs of all users—such as older people and those with disabilities—are adequately addressed.
- 9.2. In response, the policy has been refined to improve clarity and flexibility while maintaining alignment with strategic objectives. Amendments include cross-referencing London Plan cycle parking standards rather than repeating them, and allowing for alternative solutions where on-site long-stay cycle parking cannot be fully provided. Supporting text has also been strengthened through the inclusion of a cycling network map and references to relevant strategies, including the Mayor's Violence against Women and Girls Strategy.
- 9.3. Other issues raised, particularly those relating to detailed design, operational matters and site-specific delivery, have not resulted in direct policy changes as they fall outside the scope of strategic planning policy. Overall, the policy continues to be guided by the London Plan and wider transport objectives, providing a clear framework for promoting active travel while allowing for appropriate flexibility in implementation.

Policy T2: Car parking

- 9.4. Feedback on Policy T2 was mixed, with some support for a restraint-based approach to car parking, particularly in areas with high public transport accessibility. However, respondents raised concerns about the potential impacts of reduced provision, including the practicality of car-free development for certain groups, possible displacement of parking onto surrounding streets, and effects on local businesses and town centres. There were also calls for a more consistent and context-specific approach.

- 9.5. In response, the policy has been refined to address points of clarity and consistency. This includes correcting the threshold for car-free development to align with PTAL 3+ and reflecting London Plan guidance by confirming that industrial parking provision will be assessed on a case-by-case basis. These changes ensure greater alignment with strategic policy while providing clearer direction for implementation.
- 9.6. Overall, the policy maintains alignment with the London Plan and sustainable transport objectives, while allowing local circumstances to be considered through the development management process.

Policy T3: Roads and streets

- 9.7. Feedback on Policy T3 was mixed. While there was support for improving street design, promoting active travel and creating safer, more inclusive environments, respondents raised concerns about potential impacts on traffic and local communities. Key issues included opposition to measures such as Low Traffic Neighbourhoods, concerns about congestion and traffic displacement, and perceived impacts on accessibility and local businesses, alongside calls for safer, better-lit streets and improved provision for vulnerable users.
- 9.8. In response, the policy has been refined to improve clarity and reflect consultation feedback. Amendments include replacing references to 'sustainable streets' with 'Controlled Parking Programmes' within the supporting text, and strengthening policy wording to emphasise that streets and public spaces should be inclusive, accessible and safe at all times of day.
- 9.9. Overall, the policy continues to support wider strategic objectives for healthier, safer streets, with detailed design and implementation to be addressed through subsequent stages.

Policy T4: Public transport improvements

- 9.10. Feedback on Policy T4 was mixed but generally supportive of improving public transport and ensuring that development is supported by adequate infrastructure. Respondents welcomed the focus on enhancing connectivity, safeguarding routes and improving integration with existing networks, but raised concerns about current capacity constraints, including overcrowding, service frequency and reliability, and gaps in provision across parts of the borough. There were also concerns about reliance on future infrastructure and the need for stronger coordination with wider networks.

- 9.11. In response, the policy has been refined to strengthen clarity and supporting text. This includes additional references to working collaboratively with TfL and neighbouring boroughs, and recognition of the potential for future river-based transport, including new river-bus stops. Policy wording has also been amended to support improved use of river transport as part of the wider network. The policy remains aligned with the London Plan and strategic transport objectives, with implementation to be progressed through partnership working and infrastructure delivery mechanisms.

Policy T5: Freight

- 9.12. Feedback on Policy T5 was generally supportive of safeguarding freight infrastructure, particularly railheads and wharves, and promoting a shift towards more sustainable freight movements such as rail and river transport. Respondents highlighted the importance of protecting existing sites and ensuring they can operate effectively alongside new development, while raising concerns about the scope of safeguarding, the need to apply the agent of change principle, and maintaining access by multiple modes.
- 9.13. In response, the policy has been refined to strengthen alignment with strategic policy and clarify its application. This includes updates to reflect London Plan Policy SI15 in relation to safeguarded wharves, expanded protection of railheads to include co-located aggregates operations, and explicit recognition of the need to protect rail access alongside road and river connections. Policy wording has also been amended to strengthen the application of the agent of change principle, with cross-reference to Policy EN5. The revised policy provides a clearer and more robust framework for safeguarding and supporting freight infrastructure, while ensuring its effective integration with surrounding development.

Policy T6: Parking standards for disabled people and the physically impaired

- 9.14. Comments on Policy T6 were limited but raised some key concerns. Respondents highlighted issues around accessibility and inclusivity, particularly questioning whether the approach to disabled parking sufficiently reflects the needs of all users, including those without formal blue-badge status. There were also concerns about the practicality of some requirements, especially where they may be difficult to deliver on certain sites. A smaller number of comments suggested strengthening controls in related areas, such as limiting certain types of uses in proximity to

sensitive locations. In the Regulation 19 Draft Local Plan, the content of Policy T6 has been added into Policy T2 Parking to simplify and clarify the approach.

10. Integrated Impact Assessment (IIA)

- 10.1. Responses were received on the Integrated Impact Assessment (IIA) from the three consultation bodies: Historic England, Natural England, and the Environment Agency. The Environment Agency requested that additional documents and strategies, notably the TE2100 Plan, be included within the baseline information referenced in the scoping report, alongside suggested environmental monitoring criteria. Historic England similarly requested the inclusion of additional documents and strategies, particularly in relation to the World Heritage Site, and proposed an amendment to the wording of IIA Objective 8. These amendments have been incorporated into the updated IIA for the Regulation 19 Draft Local Plan consultation.

Appendices

Appendix A: Royal Borough of Greenwich Community Assembly The Big Local Plan Event Engagement Report

March 2026

Royal Borough of Greenwich Community Assembly The Big Local Plan Event Engagement Report

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01

Executive Summary



Executive Summary

The Royal Borough of Greenwich is preparing a new Local Plan to guide growth and development in the borough over the next 15 to 20 years and is seeking community feedback at the Regulation 18 stage to ensure the plan reflects not only future development needs, but also the values, priorities and lived experiences of the diverse communities of Greenwich.

The Royal Greenwich Community Assembly - Big Local Plan Event was an exciting opportunity for residents to help shape the future of the borough and share their views on Royal Greenwich's draft Local Plan. It took place as a part of a wider consultation programme that ran over an eight-week period between December 2025 and February 2026.

This report captures participants' views and feedback from the Big Local Plan Event on the draft Local Plan policies, alongside broader reflections on development and community priorities for Royal Greenwich moving forward. Below is a summary of the priority feedback from the Community Assembly.

Community priorities for the Local Plan

- Across policy themes, participants emphasised that the Plan should **more clearly consider the needs of different groups and communities**, particularly around the design of housing and social infrastructure, access to public transport and the public realm, and access to employment opportunities.
- Participants supported the Plan's ambition to **protect family homes and create mixed communities**. However, many felt the policies need to go further, **strengthening support for a broader mix of housing types, delivering genuinely affordable homes, and ensuring the Plan is future-proofed to meet rising demand for services and community facilities**.

- There was strong interest in improving the **character, accessibility and safety of the public realm** through active high streets, independent shops, and community-led spaces.
- Across policy themes, residents emphasised that the Local Plan should **ensure access to social infrastructure, art and cultural venues, employment opportunities and high-quality parks and green spaces are more evenly distributed across the borough**. There is a perception that investment and provision are concentrated in particular areas in the north of the borough, leaving other neighbourhoods under-served.
- Residents supported improved cycling infrastructure but stressed the **importance of balancing the needs of cyclists and pedestrians**. E-bikes and dockless bike hire should be better managed, especially in pedestrianised areas, while cycle routes should be designed to be safe and easy to use, avoiding unnecessarily hilly or indirect routes.
- Participants recognised the strong link between access to green and blue infrastructure and public health. They felt that **health and wellbeing objectives should be more explicitly embedded within the Local Plan**, particularly in policies relating to the environment and the provision of green and blue spaces.
- Participants identified ambiguity in parts of the policy wording. Terms such as "very high quality" in relation to building design and "financially viable" when assessing pubs for potential closure were seen as vague and open to interpretation, with potential for exploitation. **Participants would like to see clearer, more precise drafting to strengthen policies**.

Executive Summary

General feedback

Participants shared feedback that was not directly linked to a specific Local Plan policy. Some relate to the Local Plan more generally, while others reflect general observations or issues for the Council to consider.

- **Community involvement in decision-making:** Participants felt there should be more opportunities for residents to participate in local decision-making. They also emphasised that these opportunities should be better communicated and accessible to people with varying levels of understanding of the planning process.
- **Community-led approaches to provision and delivery:** Participants want to see greater support for community-led initiatives, including community-led housing, and community-ownership or social enterprise models for managing shops and spaces.
- **Maintenance:** Participants expressed concern about the long-term upkeep of town centres, public spaces, and green and blue infrastructure. Poor maintenance, such as litter or damaged planting reduces confidence in new proposals.
- **Enforcement:** There was a perception amongst participants that developers are not always held accountable for meeting agreed obligations, particularly on the provision of community infrastructure and affordable housing. They felt that there should be stronger enforcement mechanisms to ensure the Plan's ambitions are delivered in practice.

Event feedback

Participants were encouraged to share feedback on their experience of the Local Plan event. Many appreciated the opportunity to take part in discussions on the draft Local Plan and share their experience of living and working in the borough. They also valued meeting members of the Council and the Planning team, which helped them better understand the planning process. Some wished that there was more time to explore all the topics covered by the Local Plan in more detail. Several residents expressed interest in taking part in future engagement and consultation events to help improve their neighbourhoods.



02

About the Big Local Plan Event



About the Big Local Plan Event

The Royal Greenwich Community Assembly was an exciting opportunity for residents to help shape the future of the borough and share their views on Royal Greenwich's draft Local Plan.

Royal Greenwich is preparing a new Local Plan to guide growth and development in the borough over the next 15 to 20 years and is seeking community feedback at the Regulation 18 stage to ensure the plan reflects not only future development needs, but also the values, priorities and lived experiences of the diverse communities of Greenwich.

On Saturday, 7 February 2026, the Big Local Plan – Community Assembly event was held at Woolwich Works, bringing together people from across the Royal Greenwich area to explore the issues facing local communities and discuss what the borough's strategic priorities should be for the future.

The event had two main objectives:

- To gather high-quality, actionable feedback that strengthens the evidence base for policy development.

- To build trust and ongoing engagement from residents in planning for the future of Royal Greenwich.

The Big Local Plan – Community Assembly event took place as a part of a wider consultation programme, which ran over an eight-week period, from 15 December 2025 to 8 February 2026. As a part of the consultation, Royal Greenwich also delivered in-person drop-ins for residents and targeted outreach sessions for stakeholder groups, hosted online webinar events, and collected digital feedback on the consultation website: <https://royalgreenwichnewlocalplan.commonplace.is>

This event was managed, organised and facilitated by Something Collective, specialists in community engagement on design, places and change, on behalf of the Royal Borough of Greenwich.



About the Big Local Plan Event

What happened at the Big Local Plan event?

The Big Local Plan event was designed to provide attendees with an overview of the draft Local Plan and support in-depth discussions capturing specific feedback for draft Local Plan policies. There were two parts to the event: a discussion-based workshop and an exhibition.

Workshop

Workshop discussions focused on theme policies. The workshop was structured around five tables, combining the eight Local Plan themes into five areas:

- Homes and neighbourhoods (Housing)
- Good growth and local jobs (Economy)
- Lively, inclusive and safe town centres (Town Centres)
- Place, identity and design quality (Design and Heritage)
- A healthier, greener borough (Environment, Climate Emergency and Transport)

Participants were divided into five groups of 10-12 people each and took part in facilitated one-hour discussions at each table. At the end of the hour, groups rotated to the next topic, with each group covering three themes during the session.

During each rotation, participants are provided an overview of the strategic objectives for the theme at the beginning. The discussion then covered the policies thematically, supported by question prompts and display boards that provided a high-level summary of each policy. Participants were each provided a booklet with the same information to help them follow the discussion and refer back to the material presented.

This approach was chosen to facilitate informed and meaningful conversations and gather detailed feedback. While attendees only responded to three themes each, it allowed sufficient time to introduce the relevant policies and explore participants' views in more depth, resulting in richer and higher-quality contributions. Participants were given opportunities to speak directly with facilitators or provide feedback online on themes not covered in their group discussions.

During discussions, each table was supported by a member of the Something Collective team, who facilitated discussions and captured detail notes, and a member of the Royal Greenwich planning team, who introduced the policies and provided technical details, context and clarification.

Exhibition

The exhibition focused on place policies and was available for participants to view before and after the event and during breaks. The exhibition boards covered each of the eight Local Plan spatial areas and the Site Allocations Map.



About the Big Local Plan Event

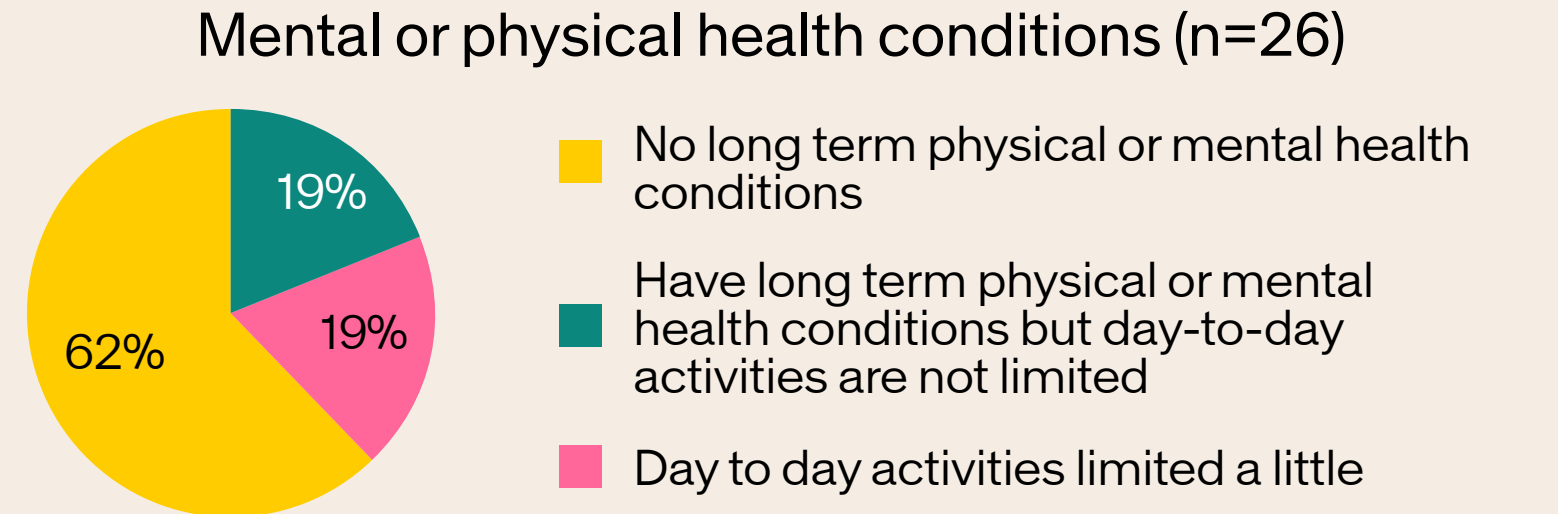
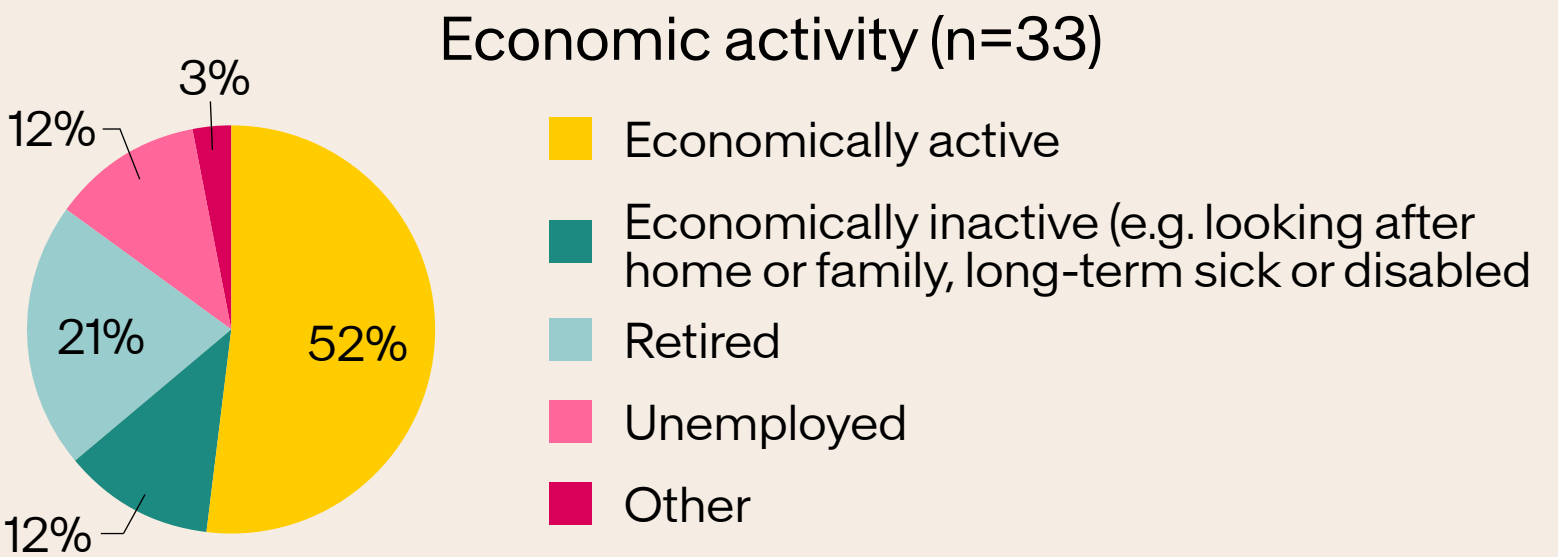
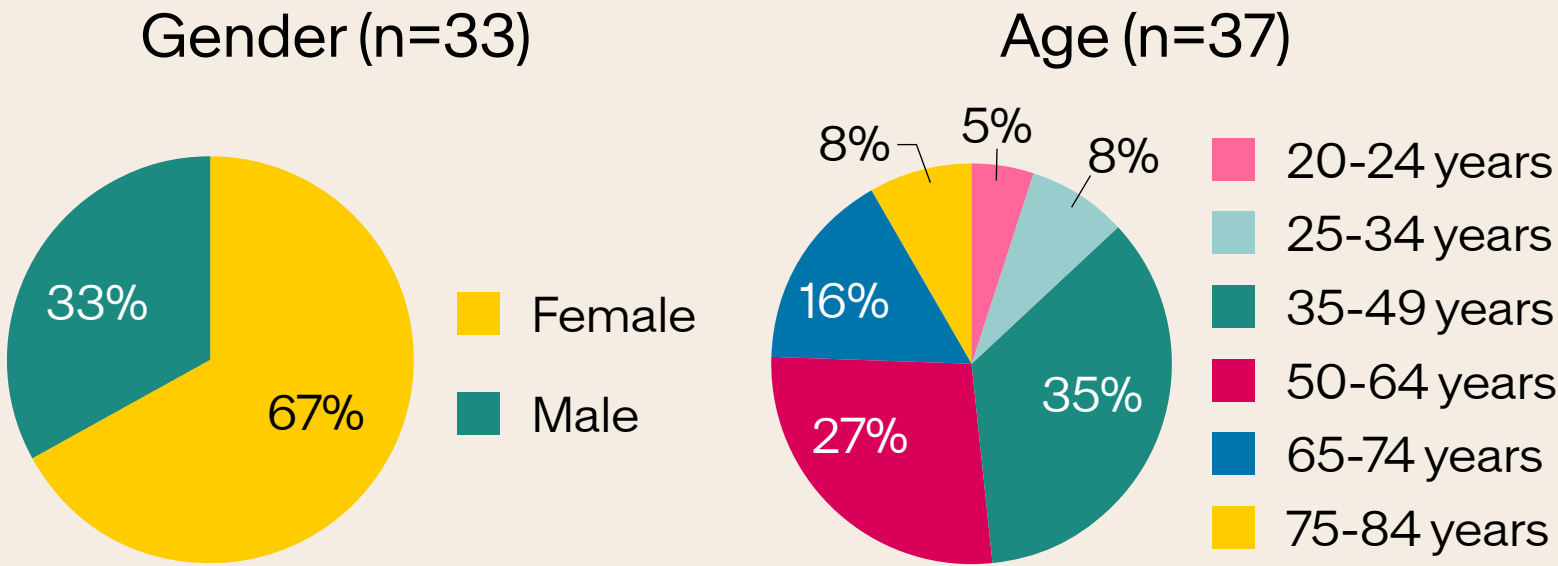
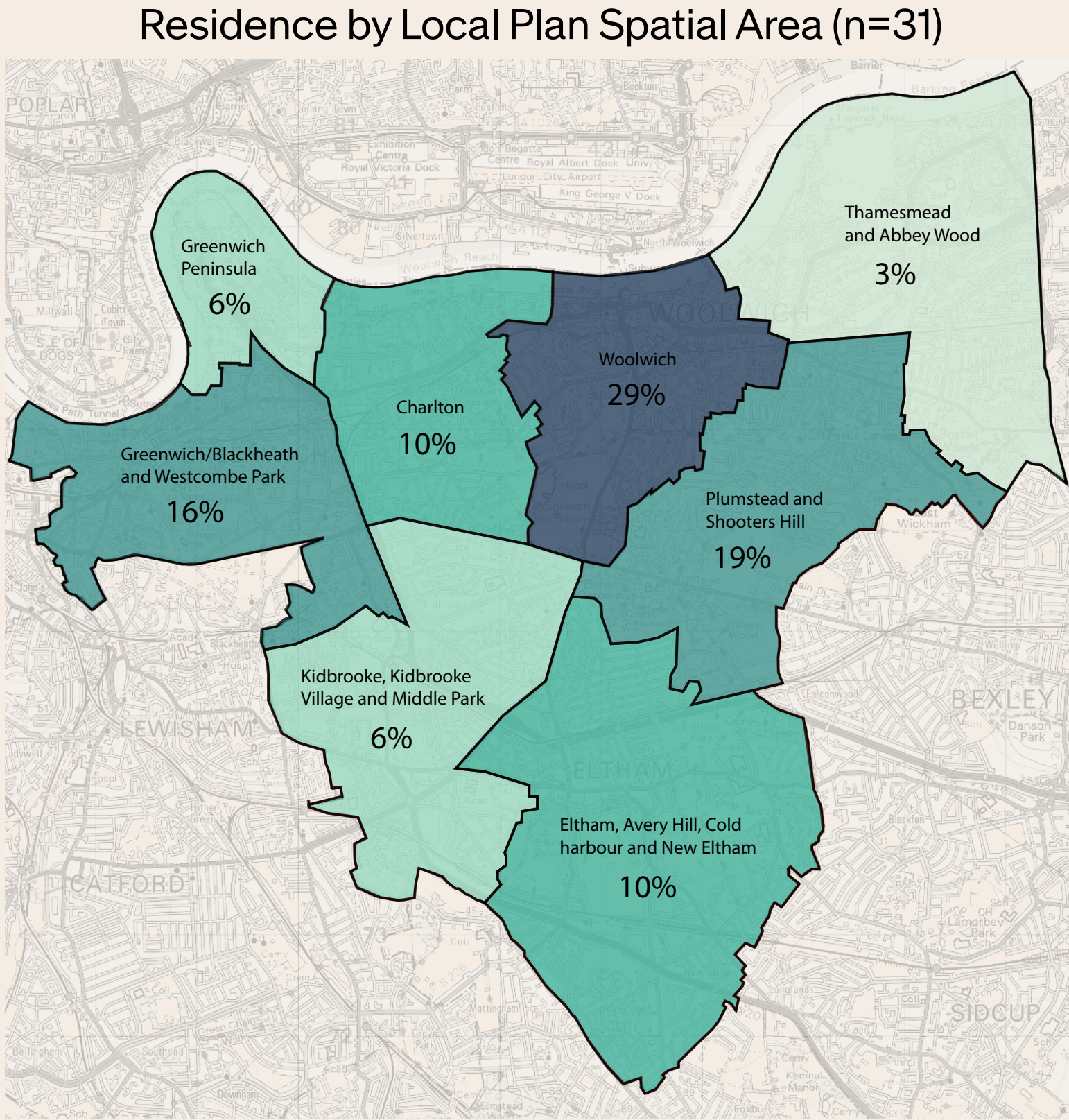
Who attended the Big Local Plan Event?

The Big Local Plan Event was promoted through a variety of channels to encourage participation from across the borough. These included:

- Royal Greenwich email newsletters
- Royal Greenwich social media posts
- Targeted emails to community groups
- Leaflets delivered to over 1000 households.

119 people expressed interest in attending via the consultation website. 60 participants were invited to allow for in-depth discussion while ensuring a balanced mix of residents from across the borough and a range of backgrounds and experiences. When a resident was unable to accept the offer of a place at the event, an alternative participant was invited from a waitlist as spaces became available. On the day, the event was attended by 57 residents.

The following diagrams show the demographic characteristics of the participants, which broadly reflect the wider demographic profile of the borough. As this information was provided on a voluntary basis, not every attendee chose to respond, so some categories may not be representative of the group as a whole.



About the Big Local Plan Event

What happens to the feedback?

All feedback gathered during the workshop discussions were recorded and collated following the event. These are organised and reported by Local Plan policy. Where participants raised issues not directly related to the Local Plan, these comments were captured and reported in the final section to ensure that all contributions are included.

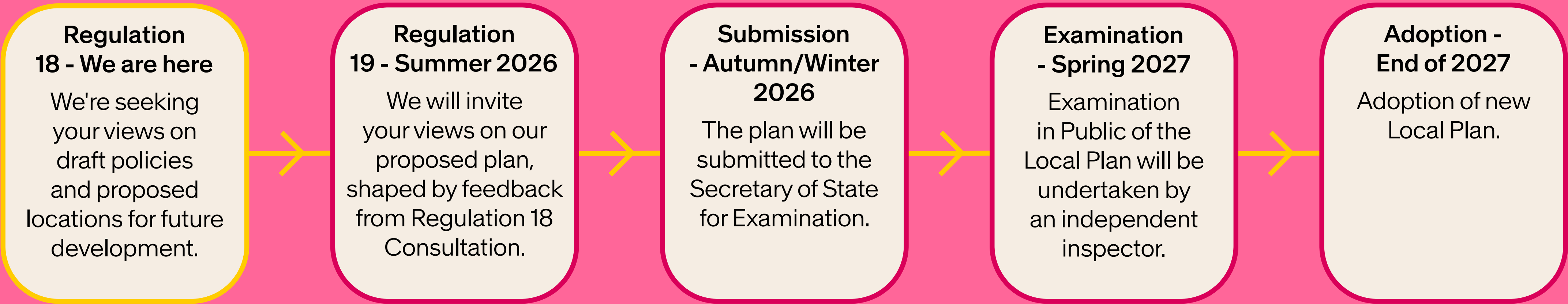
The feedback collected at this stage forms part of the Regulation 18 consultation process. It will be considered alongside responses received through other engagement channels, including the online consultation, targeted outreach sessions and other in-person engagements.

At this stage of the consultation, all responses will be reviewed to inform the draft Local Plan before it progresses to the next stage of the consultation process, Regulation 19. This is a further opportunity for the public to comment on the Local Plan.

Once Regulation 19 is complete, the draft Local Plan will be submitted to the Secretary of State for independent examination to determine whether the Local Plan is legally compliant and sound, before it is formally adopted by the Council.



Local Plan Adoption Timeline



About the Big Local Plan Event

What did Community Assembly participants think about the event?

Positive reflections

Many Community Assembly participants enjoyed the event and found it informative. They also valued the opportunity to share their experiences and perspectives. Some appreciated meeting other residents with a shared interest in improving the borough. Others added that the event was well-facilitated and created high-quality, interesting discussions about the Local Plan.

Participants appreciated the opportunity to speak directly with Council staff and the Planning team, which helped them better understand the planning process. A few people expressed interest in taking part in more community events and engagement opportunities.

Suggestions for improvement

Community Assembly participants shared suggestions for future sessions. A common response was that there was not enough time to explore all topics in detail, and a few noted that they were not able to contribute to discussions on themes they were particularly interested in. Several people suggested that it would have been helpful to receive more information about the draft Local Plan in advance to help them prepare for the event.

A small number of participants felt that certain perspectives were more prominent in group discussions, but added that the discussions were nonetheless productive and valuable.



"It was a really interesting and informative event. We were encouraged to share and listen."

"It would have been great to have had more time - so many participants had so much they wanted to talk about."

03

Theme policy feedback

This section presents the feedback received at the Community Assembly, organised by theme and covering each Local Plan policy. Comments that did not directly relate to a specific policy are captured in the next section.





Homes and neighbourhoods

H1: Meeting housing needs

Royal Greenwich's population is set to grow significantly over the plan period. The borough will support delivery of at least 42,360 high quality homes by 2037, focusing on accessible areas that have been identified for growth and making the best use of land through regeneration and design-led development.

Community assembly participants were supportive of housing delivery in principle but raised a number of concerns. Several questioned whether the overall target is achievable, as developers respond to market pressures, which does not always align with the goal of housing provision.

Some participants were sceptical about implementation. There were concerns about the gap between what is set out in the Plan, such as affordable housing targets and build quality,

and what is delivered. Some felt that developers are not being consistently enforced to meet targets and planning obligations.

The development model itself was questioned, with discussions around whether the Council should take a more direct role in building new homes, rather than relying on private developers, so the process is less profit-driven. However, others highlighted past examples of local authority-led development that they felt had not been entirely successful. Finally, some participants questioned whether community consultation meaningfully influences planning decisions.

For Community Assembly participants, housing was a particularly contentious issue, and there is a clear need to build trust in both delivery and decision-making processes.

H2: Affordable housing

This policy specifies that half of all new homes in the borough should be affordable, with a strong focus on social rent and intermediate rent. Most developments must provide affordable homes on-site.

Community Assembly participants questioned whether the 50% affordable housing target is sufficient, given that in the past, the 30% target has not been consistently achieved. Questions were raised about whether the Council would be able to enforce the affordable housing target. Other participants wanted to see a more

detailed breakdown of numbers or percentages required for new developments. While this level of detail was not included in the summary materials presented at the workshop, it is set out more fully in the draft policy wording.

Participants were also sceptical about existing definitions of affordability. They were critical about an over-reliance on rented and shared ownership models, as it was felt that they do not provide long-term stability. Participants suggested that the Plan should consider other models for delivering affordable housing.





Homes and neighbourhoods

H3: Housing mix

This policy ensures that new residential developments deliver a balanced mix of housing types and sizes, prioritising family-sized homes to reduce overcrowding and ensure families can find suitable homes in the borough.

Community Assembly participants reflected that there is currently no real “mix” across the borough. Certain areas are seen as dominated by certain housing types and demographics as a result of past planning decisions. For example, parts of Woolwich were described as dominated by “affluent flat owners”, and some areas along the Elizabeth Line were characterised as “middle class enclaves”.

Although this policy expresses a preference for a mix of housing types and sizes, some participants were concerned that it appears to be focused on flats, rather than houses. They felt that houses of different types

and sizes were needed, especially for families or older residents looking to downsize, but only flats are being built. Flats are seen as catering to young professionals, which exclude other groups of residents.

Participants suggested that this policy should include explicit references to the social and community infrastructure needed to support mixed communities. Some referred to approaches like Hackney’s “child-friendly neighbourhood”, emphasising the importance of schools, play spaces, communal areas and social spaces alongside housing for families.

Some Community Assembly participants felt the Plan should address other housing types, such as homes for key workers, noting that a lack of suitable housing could make Greenwich a less attractive place to work, impacting essential services such as hospitals and schools.

H4: Build to rent

This policy supports Build to Rent developments that deliver high-quality, well-managed homes that contribute to mixed communities. They must include affordable private rent homes and meet design standards.

There was a view amongst participants that the current Build to Rent model

caters to mid to high-earning young professionals, and that it is not truly “affordable” for other residents.

Additionally, while the policy states that there will be affordable units in Build to Rent schemes, participants did not feel that Build to Rent is a genuinely affordable housing model in the long-term and suggested that other housing models should be considered.

H5: Large-scale purpose-built shared living

Co-living schemes can help meet housing demands. This policy supports these developments where they are well-managed, well-located, provide sufficient affordable homes,

and won’t reduce land needed for general housing.

There were no specific comments raised in relation to this policy during discussions. However, earlier feedback relating to housing mix, affordability, and the provision of social and community infrastructure apply here.



Homes and neighbourhoods

H6: Purpose-built student accommodation

This policy supports student housing in appropriate, well-connected locations where it will not reduce land needed for general housing and will provide sufficient affordable and accessible bedrooms.

Community Assembly participants emphasised that the policy should consider how student numbers may change in the coming years. Given

the time it can take for schemes to be completed, they felt that it is important to plan not only for current demand, but also for projected demographic shifts, to avoid an over-supply of student accommodation in the future.

They were concerned that, if demand were to fall, student accommodation may later be converted to general housing, contradicting the Local Plan's ambition to increase the supply of family-sized homes.



H7: Sub-divisions and conversions to houses in multiple occupations (HMOs)

Sub-dividing homes or converting them into HMOs can provide more housing, but it must not undermine the supply of family homes or harm local character. This policy will manage HMOs to maintain mixed communities, with stricter limits in areas where they are already common.

During discussion, participants expressed that while some HMOs are acceptable and needed, they felt that there is abuse of the system, with family homes being subdivided into small bedsits that lack communal space or provide poor living conditions. Plumstead was provided as an

example of an area where this is an ongoing issue.

Participants wanted to see a stronger policy that goes further - they felt that the 90 sqm threshold for HMO conversions is too low to protect family housing. They also suggested that the policy should limit the number of HMOs conversions in areas of the borough where they are already common.

More generally, participants expressed feeling of frustration and disempowerment that housing decisions are driven by developers, resulting in areas that are dominated by one type of housing, such as small flats or HMOs. They feel strongly that the policy should prevent this imbalance and ensure communities retain a mix of housing types.



Homes and neighbourhoods

H8: Supported and specialist accommodation

This policy supports specialist housing for older people, disabled residents and vulnerable groups

where it meets identified needs and is well-designed and located.

No specific comments were raised in relation to this policy during workshop discussions.

H9: Small sites

This policy supports small-scale developments, including infill and extensions, if they are well-designed, respect local character, and contribute to housing supply.

Community Assembly participants felt that a specific element of the policy should establish support for Community Land Trusts (CLTs) on small

sites and encourage community-led housing. This includes requiring small sites to be publicly advertised, providing an opportunity for community groups and CLTs to come forward and express interest.

Participants also suggested that preference for developing small sites should be given to local developers to better reflect community needs.

H10: Gypsy and traveller accommodation

This policy states that the council will retain existing Traveller sites and identify new land to meet future need, ensuring safe, well-

located and culturally appropriate accommodation for the Gypsy and Traveller community.

No specific comments were raised in relation to this policy during workshop discussions.

H11: Housing quality

This policy ensures that all new homes, residential extensions and conversions will provide a well-designed, accessible, family-friendly and sustainable living environment.

A number of participants raised concerns about the perceived reduction in the internal size of new homes, particularly in spaces like hallways. This limits storage space and impacts families and larger households. Communal spaces were important to participants, and they felt

that this should be emphasised in the Local Plan.

Accessibility standards were another point of concern. Participants questioned the requirement for only 10% of homes to be wheelchair accessible and 90% to be accessible and adaptable. The 10% wheelchair accessibility quota was seen as insufficient for an aging population, and people felt strongly that all new homes should accommodate wheelchair users and residents whose needs change over time.





Good growth and local jobs

E1: Inclusive economy

A strong economy underpins everything else: jobs, opportunities, thriving high streets, and investment in communities. This policy supports the development of a strong, inclusive and diverse economy by protecting industrial land, encouraging intensification and modernisation, securing affordable workspace for start-ups and small and medium-sized enterprises at below-market rents, providing a mix of unit sizes and types, and connecting growth with benefits for local people- including employment, apprenticeship and training opportunities.

At the Assembly, attendees were enthusiastic about the proposal to diversify the economy and support businesses and enterprises in the creative, science and technology, and

sustainability sectors. Jobs in these sectors were seen as beneficial for the vitality and future of the borough.

While encouraging workspaces of different types and sizes in new developments was seen positively by many participants, others were concerned about how these units are managed once they are built. They felt that small businesses should be supported to take up these units and developers incentivised to offer units at discounted rates, rather than leave them empty.

Attendees were interested in exploring other ways that economic growth can benefit communities, for example supporting community enterprises and charities through Section 106 obligations or promoting innovation and businesses that contribute to the circular economy.

E2: Protected industrial land

Industrial land supports jobs in logistics, manufacturing, construction and waste management, but also has the potential for new industries such as green energy and advanced manufacturing. This policy protects these areas from being lost to other uses, but encourages smarter use of land like multi-level industrial

buildings and modern layouts that reduce conflicts with nearby homes.

Community Assembly participants were most concerned about how industrial land affects surrounding neighbourhoods and amenities. They emphasised that traffic and noise need to be effectively managed if industrial uses are intensified, to minimise pollution and disturbance to residents.

E3: Non-designated employment sites

Smaller businesses and industrial sites outside of the major designated areas play an important role in supporting local jobs and small businesses. This policy protects existing, viable employment sites and ensures that redevelopment replaces any lost employment floorspace.

Many participants agreed that small businesses, particularly cooperatives and socially impactful or community-led businesses, should be supported

and protected. Attendees felt that these businesses play an important role in supporting local communities and were concerned about them being priced out or lost to redevelopment.

Community Assembly participants added that employment sites should be distributed across the borough so all residents can benefit from the opportunities and jobs they provide. Additionally, employment sites would benefit from improved transport connections across the borough to support local businesses.



Good growth and local jobs

E4: Delivering inclusive growth

This policy will require major development proposals to deliver commercial or industrial floorspace, including affordable and flexible workspace, to contribute towards a mixed and diverse economy.

Community Assembly participants were positive about this policy, expressing support for more co-

working spaces and workshops that support local workers. They also supported having flexible units of different sizes, as these were seen to benefit small businesses and start-ups.

Participants reflected that affordable workshops and units should be available in different parts of the borough, so that all residents can access them within their neighbourhoods.



E5: Local employment, skills and training

This policy ensures new development directly benefits local people, improves skills, and builds a more inclusive economy. It is expected to fund employment support, deliver jobs and apprenticeship for Royal Greenwich residents, and engage local suppliers and businesses wherever possible.

Community Assembly participants broadly agreed with this policy. However, they felt strongly that people of all different ages and at different stages of their career should be able

to access new employment and development opportunities. They pointed out that many apprenticeships and training and employments programmes are aimed at young people, but there is not enough support for mid-career professionals, older people and people who have been out of work.

While not within the scope of this policy, participants added that lack of awareness and signposting can be a barrier to accessing employment and training opportunities. They suggested that the Council should ensure that residents are properly supported to benefit from them.



Good growth and local jobs

H6: The visitor economy

Royal Greenwich is a global destination, with the Maritime Greenwich World Heritage Site, museums, historic centres, and the riverside. This policy aims to maintain the attractiveness of the borough as a visitor destination, balancing the needs of visitors and local residents to ensure growth in tourism is sustainable and inclusive.

Community Assembly participants supported the protection of arts and cultural venues and pubs, seeing them an important part of community life and the borough's heritage. However, some felt that the policy does not go far enough in protecting pubs, noting that pubs which are less financially strong nonetheless play a key role in serving the community. They were concerned that the criterion in the Local Plan on financial viability leaves pubs vulnerable to redevelopment.

Participants felt that visitor activity and investment are not evenly distributed across the borough, with too much focus on certain areas and not enough support for local businesses and communities in other areas. For example, alongside supporting arts and cultural uses in major and district centres, participants felt that there should be consideration for locating these venues in places that would benefit local people and encourage people to spend time in less-visited parts of the borough.

In relation to hotels, participants raised that Airbnb and short-term rentals have a big impact on the area, and that they should be addressed specifically in the Local Plan.

Attendees agreed that free and publicly accessible toilets are an important amenity for residents and visitors. They reflected that it can be difficult to find suitable toilets for families and disabled people. Inclusive

and well-designed toilets that meet design standards should be more widely available across the borough, especially at key hubs such as train stations.

To support a vibrant local economy, there were suggestions that arts and culture offers should prioritise local people, for example through subsidised or affordable pricing.

Participants added that improved

public transport connections and walking routes would help residents and visitors move around more easily, bringing business and support to all parts of the borough, including places that are less visited.

Finally, attendees felt that wayfinding and signage could be improved to help visitors access attractions across the borough, as well as to access amenities such as public toilets.



Lively, inclusive and safe town centres

TC1: Supporting the network and hierarchy of centres

This policy outlines the hierarchy of Royal Greenwich's town centres and the plan's intention to promote the diversity, vitality and viability of the borough's town centre network.

At the Assembly, participants reflected on the role of town centres in community life, and many shared the perception that some centres have declined in recent years, particularly in terms of safety, public realm quality, and overall vibrancy. At the Major Centre scale, Woolwich Town Centre was often given as an example of where there is an over-concentration of certain uses - especially service-based businesses - and a lack of variety in the retail offer. It was also noted for its lack of cinema and other night-time economy uses.

Attendees recognised that shopping habits have changed, with some people using apps and online services for food and other daily needs.

Nonetheless, they value physical independent shops for clothing and more speciality purchases, and felt that a mix of different retail offers should be encouraged in town centres. Participants added that town centres work best when they offer a mix of uses, such as entertainment and leisure experiences, social activities dining out, alongside retail.

At the Local Centre scale, many people felt that they do not have good access to shops and community spaces that cater to their everyday needs. They wanted to see high-quality local shops, such as independent bakeries and greengrocers as an alternative to supermarkets, as well as social and community spaces, to improve the character and liveliness of their neighbourhoods.

To create vibrant town centres, participants emphasised the importance of high-quality public realm and a strong sense of safety. They felt that many centres are

currently poorly maintained, providing examples of covered or neglected shopfronts, poor lighting at night, and a prevalence of bikes and scooters that make streets less pedestrian-friendly. It was suggested that landscaping and

a tidy, well-maintained environment would improve accessibility and safety. The Plan should encourage public realm improvements and measures that make town centres welcoming and safe for everyone.

TC2: Managing edge-of-centre and out-of-centre uses

To keep town centres busy and thriving, this policy ensures that new shops, cafés, leisure spaces and similar uses are located in town centres first. Large retail or leisure developments outside main centres will not be supported unless they can show there is no suitable site within a town centre and they won't harm existing centres.

Community Assembly participants agreed that town centres should be supported to flourish. However, they emphasised that this approach needs to be balanced with inclusivity and considerations for different needs.

Some pointed out that larger, out-of-centre supermarkets are often more affordable than their smaller high-street and neighbourhood equivalents. Additionally, while attendees agreed that active and sustainable travel should be promoted, it was pointed out that being able to drive to shops with parking is more accessible for disabled residents or people with mobility needs, compared to taking public transport or going to pedestrianised high streets.

Nonetheless, many participants noted that there are significant traffic and congestion around Charlton and agree that this should be managed improve residents' experience in the area.

Lively, inclusive and safe town centres

TC3: Culture, evening and night-time economy uses

This policy supports Royal Greenwich's evening and night-time economy in key centres to contribute to cultural vitality and economic growth.

Community Assembly participants supported this ambition. Reflecting on their current experiences of the cultural, evening and night-life scene in the borough, many felt that there are gaps in the local offer. For example, major evening and night-time destinations such as North Greenwich are seen as catering to a younger crowd. People felt that there should be a greater diversity of evening and night-time uses that appeal to different groups of people.

Participants recognised that Greenwich's local culture and night-time economy uses compete with that of Central London's. To encourage Greenwich residents to stay local and draw visitors in, the borough's centres

need to offer something distinctive that cannot be experienced anywhere else. A participant highlighted the Thames-Side Studio open day, which showcases local artists and makers, as a good example of this.

Participants agreed with extending opening hours and encouraging a mix of uses, particularly in district and local centres. They appreciate the value of smaller, neighbourhood-based venues that create a different kind of evening experience to large-scale destinations and which appeal to a different audience, such as working parents or older people. They provided examples of local cafés that run supper clubs and film screenings at Greenwich Picturehouse.

Some participants emphasised that they avoided visiting town centres at night as they feel unsafe, and added that it is not enough for a single venue to offer evening and night-time activities.

To motivate people to go out at night, these spaces need to function as a part of a wider network, supported by other complementary uses and reliable night-time transport links. These factors also help to foster a sense of safety.

Finally, attendees recognised the importance of balancing evening and night-time uses with residents' needs. They emphasised that venues need to be located and managed well to avoid conflict and noise complaints, which may lead to venue closures.



Lively, inclusive and safe town centres

TC4: Markets, events and pop-up spaces

Markets and pop-up spaces make centres lively and adaptable. This policy protects existing street markets, supports new markets and pop-up spaces where they complement existing retail and cultural offers, and supports pop-ups to bring empty shops back to use.

Community Assembly participants were in favour of markets and pop-up spaces and felt that they would support the character and their enjoyment of town centres, especially if they brought life into vacant shop units. Several suggested that the Plan should encourage community-led models for operating events and pop-up spaces, as these may better reflect the aspirations and needs of local communities.

Many attendees appreciated Greenwich's long-established markets,

such as in Greenwich and Woolwich, but some were concerned about their impacts on the public realm (e.g. rubbish) and the quality and affordability of goods provided by traders. There was also some critical feedback on the organisation and delivery of the recent Christmas Market in Woolwich. The Plan should consider how proposals for new markets will address these issues and create a positive experience for residents.

Some attendees raised concerns about persistently vacant shop units. Although it may sit beyond the remit of the Local Plan, there was interest in exploring mechanisms that could encourage landlords and developers to bring empty units back into use and prevent them in the first place, such as incentives for affordable rent or penalties levied on long-term vacancies.

TC5: Meanwhile uses

This policy supports temporary “meanwhile” uses in empty buildings or vacant land to help bring life to underused spaces, support local enterprise and the cultural and creative sectors, and boost the vitality of town centres and regeneration areas.

Similar to responses to policy TC4, participants wanted to see support for community-led approaches to meanwhile use, such as those managed by community ownership and cooperatives, providing local communities with meaningful opportunities to shape their local places. Overall, participants were positive about supporting meanwhile uses to make the most of underused spaces.



Lively, inclusive and safe town centres

TC6: Managing hot food takeaways and gambling uses

To protect public health and the character of centres, this policy manages the location and concentration of hot food takeaways and gambling establishments.

Community Assembly participants agreed strongly with the measures outlined in this policy, agreeing that gambling uses and hot food takeaways should be restricted. Many were concerned about the existing concentration of gambling shops in town centres and the harm they cause, particularly to people who are already vulnerable.

TC7: Social and community infrastructure

This policy ensures that new development contributes to social and community infrastructure provision to meet the needs of

Regarding hot food takeaways, attendees emphasised that there needs to be plans to better manage delivery operations so bikes and other delivery vehicles do not obstruct streets or make them feel unsafe to use. They recognised that food delivery provides an important service for many people, but felt that it should be better balanced with the goal of creating welcoming and accessible town centres.

Some participants noted that there are other types of establishments that negatively affect public health, such as shops selling processed snacks and sweets, and felt that these should similarly be restricted by the Local Plan.

existing and future populations and protects existing facilities.

There was broad agreement that the borough would benefit from more social and community infrastructure designed to serve a diverse range

of users. For example, many felt that teenagers and young professionals have “nowhere to go” in Greenwich. Others felt that there is a lack of community spaces for families and children. People wanted to see multi-generational and multi-use spaces. Woolwich Library was seen as a good example of a multi-use space that served different age groups throughout the day.

Accessibility and inclusivity were priorities for participants. The Plan should ensure community and social infrastructure are designed to accommodate different abilities and needs, including sensory considerations.

Attendees who live in areas going through regeneration were particularly concerned about the pressure on local services as the population grows. They agreed that the provision of health and social care services, such as GP clinics, dentists and nurseries need to increase alongside housing development.

Some participants reflected that there is a lack of community centres and meeting spaces in the borough, identifying several facilities that have closed in recent years. It was suggested that the Plan should support co-locating these spaces with other social infrastructure to support their viability, for example, integrating community meeting spaces in libraries.

Finally, it was raised by several attendees that community facilities are not evenly distributed. Many social and community spaces are located in the north of the borough and there are fewer options in areas such as Eltham. The Plan should consider how residents in all parts of the borough could have equal access to welcoming community spaces. This is especially important for young people, as well as for disabled residents and people with limited mobility, who may find it more difficult to travel across the borough.



Place, identity and design quality

DH1: Principles for high quality design

This policy sets out the key principles for 'high quality design'. It seeks to ensure that new developments respect local character and heritage, make appropriate use of land, create inclusive and accessible spaces, use appropriate materials and are designed for climate resilience.

At the assembly, participants agreed that high quality design is not only about a building's appearance, but also the quality of materials being used. They highlighted concerns around the current and future approach to maintaining good quality design, suggesting maintenance to be a key component of high-quality design, something that will enhance the longevity of building materials and overall condition. To help maintain high quality design, policies around maintenance should be considered.

Canary Wharf was discussed as an example of good, high-quality design by some participants, celebrated for its approach to new developments, as well as its maintenance and upkeep. However, it was acknowledged during discussions that building maintenance normally falls outside the remit of planning, including planning conditions or Section 106 obligations, except in very limited circumstances; general building maintenance is a routine responsibility of the owner.



DH2: Tall buildings

This policy sets out that proposals for tall buildings will be supported in principle within the appropriate locations set out in the Local Plan and Policies Map. It states that tall buildings must be of very high quality, suit the local surroundings, and not spoil important views or historic places.

The main concern for participants was how private developers will be kept accountable to the height restrictions set out for new developments. There were fears and concerns that private developers will find ways around these or make justifications based on the need for more affordable homes.

Participants discussed the importance of community provision across the area and felt strongly that tall buildings should serve the public in some way. One participant raised the point that some tall buildings across the area are left empty at the weekend as they are used by people from outside of

the area during the week. Additionally, participants highlighted the need for appropriate parking provision in relation to tall buildings – more people, means more cars and there should be enough parking to support it.

Similarly, waste management was raised as a concern for tall buildings too, suggesting the need for appropriate waste management regulations to ensure minimal impact on the surrounding areas and community. Further considerations for surrounding the environment around tall buildings and wider community were highlighted in relation to the potential wind tunnels and lack of sunlight created by tall buildings.

The safety and materiality of tall buildings in response to the Grenfell Tower enquiry was highlighted by all three groups. Participants felt that the policy should be clearer on what it means by 'very high quality' in relation to materiality and overall safety.



Place, identity and design quality

DH3: Public realm

High-quality public spaces - such as streets, parks, and squares - are just as important as buildings. This policy seeks to ensure that new developments contribute to a high-quality environment that promotes healthy living, strengthens community ties, and reflects the borough's distinctive identity.

Community Assembly participants agreed that active ground floor uses help create lively and safe public realm, but added that there should be a diversity of offers, including independent shops, markets, and community spaces. Public art and planting were also suggested as features that contribute to a sense of safety and welcome in public spaces.

There was general support for healthy streets that encourage walking and cycling. However, some participants raised concerns about the speed of e-bikes and scooters, as well as dockless hire bikes cluttering

pavements. They emphasised that these provisions need to be managed to ensure accessibility and safety for pedestrians.

Participants highlighted the importance of seating and lighting, particularly in and around green spaces, to encourage people to use public space. Additionally, good design alone is not enough to create high-quality public spaces – they need to be supported by regular maintenance and upkeep, keeping them clean and tidy to encourage use and create an inviting environment.

When it comes to new developments, participants felt that there is currently a narrow view taken on what the public realm includes. They felt that the Plan should take a more ambitious approach, ensuring that public realm integrate with surrounding areas and serve the needs of the wider public, not just residents within new developments.

Places along the Thames were given as examples of where this has not been well-considered. They felt that

DH4: Heritage assets

This policy aims to conserve, and where appropriate, enhance Royal Greenwich's unique and diverse heritage assets, including conservation areas, listed buildings, archaeological remains, scheduled monuments and historic parks and gardens.

Much of participants' feedback focused on the potential impact of new development on the borough's heritage assets. For example, participants raised concerns about local environmental impacts and the effect of tall buildings on the character and setting of historic areas and assets.

developers' responsibility to improve the public realm should not end at site boundaries, but uplift surrounding areas.

Participants supported the adaptive re-use of heritage buildings, especially if new uses serve community needs. However, they added that any changes or enhancements should be carried out sensitively, respecting the character and historic significance of the asset.

In addition, participants highlighted that certain community facilities, such as pubs and community centres, have heritage and community value even if they are not formally designated heritage assets. These comments are explored further in Policy E6: The visitor economy and Policy TC7: Social and community infrastructure.

Place, identity and design quality

DH5: Maritime Greenwich World Heritage Site

The Maritime Greenwich World Heritage Site is one of the United Kingdom's most significant cultural assets, identified for its outstanding and internationally significant value. This policy ensures that

development within or near the site must protect, conserve and enhance its "Outstanding Universal Value", its key views, skyline and setting, as well as its unique architecture and historic character.

No specific comments were raised in relation to this policy during workshop discussions.



DH6: Strategic and local views

This policy outlines how local views of important landmarks will be managed, and where possible, enhanced, as part of the borough's character, heritage and sense of place.

Initial discussions raised questions about the visibility and accessibility of the current Core Strategy map that identifies the local views that are protected. Participants felt it was important that the community had a good understanding of the protected views, to help safeguard them from any future developments. The group were advised that the local views will be included in the policy map for the Regulation 19 Draft Local Plan, which will considerably improve their visibility and accessibility.

Views along the river were highlighted as areas that should be protected, both

views of the river and views from the river to other areas within the borough. This was raised particularly in relation to the earlier tall buildings policy, and the potential impact that tall buildings will have on these. Charlton Riverside was given as an example, with one resident suggesting that buildings along here should be no taller than eight stories to minimise impact on existing uses, the surrounding environment and views.

The viewpoint in Shrewsbury Park – towards Dartford Bridge – was highlighted by residents as a viewpoint that is enjoyed widely and should be considered as a new local view.

Furthermore, it was raised that greater consideration should be given to the placement of telecom masts across the area and their potential impact on key views.



Place, identity and design quality

DH7: Shopfronts, advertisement and signage

This policy supports high-quality shopfronts, advertisements and signage that positively contribute to the character, appearance, safety and vibrancy of town centres and neighbourhoods.

Community Assembly participants agreed that shopfronts and signage should be attractive and complement the character of surrounding areas. Participants suggested that they could be designed by local artists and creatives with community involvement, and provided similar initiatives in Hackney as an example.

Participants felt that shopfronts should contribute to safety and ensure accessibility, supporting policy direction focused on creating active frontages to encourage browsing and

passive surveillance. For example, they suggested that shopfronts and windows should not be covered up or shuttered, to create a sense of overlooking and make streets feel more welcoming. Similarly, entrances and areas surrounding shopfronts should not block pavements and be free from clutter to improve the experiences of pedestrians.

There were also concerns around signage and wayfinding. Participants raised that some older signage has not been removed in certain places, which can be confusing. Existing signage should be reviewed to ensure it is clear and consistent. It was suggested that the wayfinding should not rely solely on visual signage, and that more interactive and accessible approaches to wayfinding should be explored.

DH8: Thames policy area

The River Thames is central to Royal Greenwich's identity. Under this policy, riverside developments must protect and enhance the special character of the River Thames and Thames-side.

No specific comments were raised in relation to this policy at the "Place, identity and design quality" table.

However, in discussing other policies, Community Assembly participants agreed that the riverside should be enhanced by improving safety, strengthening walking routes and connections to other parts of the borough, encouraging a wider range of uses to increase footfall, improving the riverside public realm, and providing more seating and spaces for socialising.





A healthier, greener borough

Environment

EN1: Green and blue infrastructure

This policy aims to protect and enhance the borough's green and blue infrastructure to maximise social, environmental and economic benefits.

Community Assembly participants suggested that there should be more emphasis on making green and blue infrastructure, such green links and footpaths, accessible, as this is not explicitly referenced in the policy.

Participants said that their enjoyment of green and blue infrastructure, particularly the Thames path, is limited by the lack of maintenance and upkeep. This is especially the case in the summer period when there is more

foot traffic. They suggested that there should be an overall ambition to keep the borough tidy and well-maintained.

Additionally, participants identified that health is not explicitly recognised as a benefit of green and blue infrastructure under this policy. Access to use of green and open spaces are directly linked to improving population health outcomes, and embedding health objectives within planning policy would deliver tangible benefits for local people. New developments should be expected to contribute to health and wellbeing, for example through creating accessible, welcoming environments that support physical activity and social connection.

EN2: Open space

Open spaces support play, recreation, sport and community life. The plan protects existing open spaces and playing fields, improves quality and access to open spaces, and supports multi-use spaces that support different community uses.

Community Assembly participants noted that the safety of open spaces should be explicitly mentioned and emphasised in the draft Local Plan. Thamesmead lakes and ponds were brought up as an example of blue infrastructure that is not seen as safe, particularly for children, while green spaces like Plumstead Common are seen as having poor lighting. Improving safety for these spaces will improve enjoyment and increase use.

Feedback strongly emphasised the value of the former Aquatic Centre at

Woolwich Dockyard as a community asset that should be brought back into use. There were concerns about open spaces, including those associated with the former Aquatic Centre, being sold off. Participants felt the Local Plan should clearly state the borough's commitment to protecting and maintaining infrastructure and spaces that deliver community benefit.





A healthier, greener borough

Environment

EN3: Biodiversity

This policy aims to enhance biodiversity and ensures that new development contributes positively to the natural environment.

Community Assembly participants felt that the policy should encourage planting, particularly wild planting and native species that are well-adapted to the local climate. They noted that a lot of planting, particularly trees, do not live long due to neglect or because they are poorly suited for the climate.

Participants agreed with the policy that new developments should replace and planting that is removed, but emphasised that new planting needs to preserve or enhance biodiversity, not default to “low maintenance” species with lower ecological value. Additionally, tree planting and landscaping must be supported by long-term maintenance.

The feedback highlighted concerns about the governance and distribution of green spaces across the borough. Attendees made references to the removal of green spaces in areas such as Eltham and Kidbrooke, questioning how trade-offs are made when green spaces are lost to development, and who is accountable for these decisions. The Plan should support residents’ equitable access to biodiversity and green spaces.



EN4: Air quality

The Plan sets strict requirements: all new developments must demonstrate how they will reduce local pollutant emissions and minimise residents’ exposure to poor air quality.

While no specific comments were raised in relation to this policy at

the “A Healthier, Greener Borough” table, air quality was highlighted as a concern when discussing Policy E2: Protected industrial land. Community Assembly participants emphasised that supporting industrial jobs must not come at the cost of increased traffic and air pollution for surrounding residents.

EN5: Local environmental impacts

This policy specifies that developments must prevent harm to existing and future occupants and the quality of the environment from noise, light, odours, contaminated land, and waste.

Community Assembly participants felt the policy should take a stronger approach to mitigating environmental impacts. New developments should

be given clear environmental targets which are effectively enforced. If these targets are not met, there should be penalties that are directed back into local communities to help rectify or compensate for the issue caused.

While discussing policy E2: Protected Industrial Land, participants suggested that the Plan should consider minimising the local environment impact of industrial land on surrounding communities by requiring green spaces and planting.



A healthier, greener borough

Environment

EN6: Flood risk and sustainable drainage

Parts of the borough are at risk from flooding. To ensure development is resilient to future climate impacts, this policy requires detailed flood risk assessments for sites in vulnerable areas, Sustainable Drainage Systems (SuDS), and water-efficient designs in new homes and buildings.

No specific comments were raised in relation to this policy during workshop discussions.

EN7: Strategic waste management

The borough must contribute to London's goal of net self-sufficiency in waste management. The Plan protects existing waste facilities, supports new and more efficient facilities if needed, and requires all developments to design for recycling and waste reduction.

No specific comments were raised in relation to this policy during workshop discussions.





A healthier, greener borough

Climate emergency

CE1: Climate resilient and net zero design principles

This policy requires all new buildings to be designed to be zero carbon and climate resilient from the start. This includes designing to avoid overheating without relying on air conditioning and limiting water use in new homes to below national standards.

Community Assembly participants were positive about this policy and agreed that there should be a stronger focus on climate resilience and net zero design. However, some added that while this policy plans for the future, the impacts of climate change are already being felt, and more immediate action needs to be taken to adapt existing buildings and public realm.

Additionally, participants mentioned specific design elements for climate resilience. This includes encouraging sustainable material choices for buildings and public realm work, and triple-glazing windows in new developments.

It was suggested that Section 106 and a proportion of the Community Infrastructure Levy (CIL) should contribute to environmental and climate-related improvements.



CE2: Operational carbon and energy balance

This policy requires all new buildings to be net zero in operation. Developments need to minimise energy used and have a low demand for energy for heating.

No specific comments were raised in relation to this policy during workshop discussions.

CE3: Decentralised energy supply

This policy requires new major to use existing or planned heat networks, and large schemes are encouraged to use communal low-temperature systems (like heat pumps).

No specific comments were raised in relation to this policy during workshop discussions.

CE4: Whole life carbon and circular economy

This policy sets clear limits on embodied carbon – the greenhouse gas emissions associated with the manufacture, transport, installation, maintenance, and disposal of building materials. It also encourages a circular approach to minimise waste and energy use.

Community Assembly participants agreed with this policy in principle but highlighted the need to strengthen post-occupancy monitoring and long-term accountability within this policy. There should be regular monitoring to ensure sustainability measures perform as intended and do not fail once buildings are completed.



A healthier, greener borough

Climate emergency

CE5: Retrofitting and existing buildings

This policy supports sensitive retrofits that improve insulation, stop draughts and add renewable energy such as solar panels or heat pumps.

Participants' feedback on this policy focused on how it would be delivered in practice. They suggested that there should be standardised retrofit guidelines to ensure the right solutions are applied and help streamline the delivery process.

Quality assurance was another concern - the policy should ensure that retrofit works are done properly, rather than cheaply.

For homeowners, the Council should improve communication and information-sharing, providing practical advice and examples to encourage take up. They also acknowledged that some residents are concerned that retrofit measures may reduce usable space in their homes.





A healthier, greener borough

Transport

T1: Active travel and cycle parking

This policy aims to make it easier for walking, cycling and public transport to be used for short trips. New developments must integrate with and improve local connections and facilities for these modes of travel.

Community Assembly participants noted that in a particularly hilly borough, routes need to be carefully planned to maximise usability. The route connecting Woolwich to Greenwich was given as an example -

T2: Car parking

This policy states that developments must provide the minimum level of car parking provision necessary, for people with disabilities, as set out in the London Plan 2021 and Policy T6. Many residential developments will be

the cycling route is indirect and covers hilly terrain, which means that cyclists may end up choosing to use flatter, more traffic-heavy roads.

Participants highlighted that walking and cycle infrastructure alone is not enough to encourage active travel – they need to be well-connected, maintained and safe. Bike theft is another deterrent and there should be secure facilities for parking and storage. It was suggested that there should be better signposting and wayfinding for bike routes.

car-free, particularly in town centres and places with a high PTAL rating.

Community Assembly participants were divided on car-free developments. Some felt that car usage is unsustainable and should be limited where possible, and that

car parking impacts their experience of public spaces and streets. Others argued that car-free policies disproportionately impact people who need cars, such as people with mobility issues, which is unfair.

T3: Roads and streets

This policy will deliver a high-quality, inclusive and sustainable street network, applying Healthy Street principles and reducing road danger through design.

Community Assembly participants had mixed views on traffic management measures, including Low Traffic Neighbourhoods. While they were seen as beneficial in some areas, it was reported that they can create knock-on effects that lead traffic elsewhere, which does not always improve conditions for cyclists and pedestrians.

A separate issue was raised around EV charging. Participants reflected that charging points are difficult to find and that costs are too high. They suggested that there should be more charging facilities, with more affordable pricing.

Additionally, participants raised that some groups, such as tradespeople, will continue to need car access, and this should be considered when implementing traffic restrictions.

Participants agreed that planting and green infrastructure, such as green roofs and walls, are beneficial for pedestrians and cyclists. They added that street design should minimise conflict between pedestrians and cyclists, for example through segregated lanes that support pedestrian safety.



A healthier, greener borough

Transport

T4: Public transport improvements

This policy ensures development goes hand-in-hand with transport upgrades. It backs major new projects, including a Bus Rapid Transit (BRT) service linking Woolwich, Thamesmead and Abbey Wood and extending the DLR to Thamesmead.

Community Assembly participants agreed that public transport access and capacity should be improved across the borough. Issues highlighted

in the feedback include limited bus accessibility in Thamesmead and the lack of connection from Eltham to the Elizabeth Line. They also raised concerns that planned housing growth and a shift towards sustainable transport could place pressure on existing services, if capacity is not properly assessed and addressed.

Participants suggested that river bus access and pier infrastructure should be improved, as well as connections between the two banks of the river.

T5: Freight

This policy protects river wharves and railheads so goods can be moved by water and railheads so goods can be moved by water and rail, and encourages local delivery hubs, cleaner vehicles and cargo bikes for cleaner air and safer streets.

No specific comments were raised in relation to this policy. Comments relating to the impact of vehicles linked to industrial uses have been addressed in E2: Protected Industrial Land and EN4: Air quality.

T6: Parking standards for disabled people and the physically impaired

This policy requires developments to provide disability accessible parking spaces and to design them properly.

Community Assembly participants agreed with this policy. Other comments relating to disability accessible parking have been discussed in T2: Car parking.



04

General feedback



General feedback

This section captures feedback that were not directly linked to a specific Local Plan policy. Some relate to the Local Plan more generally, while others reflect general observations or issues for the Council to consider.

Community involvement in decision making

Through wider discussions, some participants felt that community involvement is not meaningfully embedded in the Local Plan process and could be strengthened by Royal Borough of Greenwich. Participants emphasised the importance of giving the community real agency and building local skills to support ongoing participation. They stressed that residents should be involved from the very beginning of the planning process, rather than consulted after key decisions have

already been made. There was also recognition that engagement needs to be varied and accessible, using different approaches to reach different groups effectively. Some suggested educational initiatives to help residents better understand how planning works, the different levels of influence available, and how they can get involved. In addition, participants called for more structured consultation on specific proposals, such as planting schemes or high street improvements, to ensure community input meaningfully informs practical decisions.

Community-led approaches to provision and delivery

Community Assembly participants wanted to see a greater recognition and support for community-led initiatives in the Local Plan, including community-led housing and community-managed spaces and meanwhile uses. It was felt that these approaches can meet local needs more directly and support community life.

More generally, some participants reflected on the ambitions of the Plan and felt that it works within established systems and delivery models that they believe are not working for them, particularly in relation to housing and the Council’s relationship with private developers. They want the Council to consider alternative models of delivery and ownership that may better reflect community priorities.



General feedback

Enforcement

There was a perception amongst Community Assembly participants that Section 106 agreements are not consistently delivering the promised benefits for communities. They gave examples where affordable housing targets had not been met and added that obligations relating to community infrastructure were often weakened during the development process. It was suggested that developers are not held to account for meeting agreed obligations.

Similar concerns were raised in relation to environmental and climate policies. Community Assembly participants felt that there should be clearer consequences if developers fail to meet climate and environmental standards. Stronger enforcement mechanisms would build confidence that the Plan's objectives will be realised in practice.

Maintenance

During discussions, Community Assembly participants frequently returned to the issue of maintenance. While there was broad agreement with many of the Plan's ambitions, such as creating more vibrant town centres, improving street quality, and delivering green and blue infrastructure, participants were concerned about the long-term upkeep of these improvements.

Participants cited examples of litter and damaged planting on high streets and public spaces, as well as new planting that has not been maintained. These experiences have reduced some people's confidence in new proposals. While it was acknowledged that day-to-day maintenance is outside the scope of the Local Plan, participants felt that the Council should consider how spaces will be maintained over time to make sure that the Plan's ambitions are reflected on the ground.



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