

Introduction

- 1.1 The Royal Borough of Greenwich welcomes the opportunity to comment on the draft London Plan. Overall, we are generally supportive of the content and approach of the draft Plan, and consider it represents a real positive step forward in how the Mayor plans for London. We particularly welcome the clear focus on planning issues, and consider this improves the clarity of the Mayor's priorities and how they will be implemented.
- 1.2 We have set out our views on the overarching objectives and approach of the draft Plan below, and provided detailed comments on the policies and supporting text in the appended table. Together this constitutes the Royal Borough's response to consultation on the draft London Plan.

Chapter 1 Planning London's Future (Good Growth Policies)

- 1.3 We support the concept of Good Growth as a guiding principle, and together the core policies in this chapter provide a clear strategic direction for the Plan. We are pleased to note the inclusion of the Healthy Streets Approach in Policy GG3 Creating a Health City as this remains a priority in the Royal Borough.

Chapter 2 Spatial Development Patterns

- 1.4 We support the new approach to Opportunity Areas (Policy SD1), which groups them into growth corridors and is focused on providing the most detail on those Opportunity Areas that relate to key Mayoral transport priorities. We consider that the actions set out for the Mayor and boroughs will be effective in realising the potential of Opportunity Areas, and share the Mayor's view that where significant development is planned it should benefit local communities by providing genuinely affordable housing. Indeed, this is a key objective of the Council's own Housing and Anti-Poverty Strategies.
- 1.5 We fully support the Mayor's ambitions to deliver new river crossings to unlock growth, including the extension of the DLR to Thamesmead and the Barking Riverside to Abbey Wood Overground crossing. The strategic direction set out for the Thamesmead and Abbey Wood OA aligns with borough aspirations for the area. We urge the Mayor to adopt a faster timescale for delivery of the DLR extension to unlock the significant development potential of the Thamesmead area. Without the DLR extension, the ambition to deliver good growth will not be realised.
- 1.6 We are pleased to note that the draft Plan aligns with our aspiration for Woolwich to be reclassified as a Metropolitan Town Centre in the future. We also support the requirement to realise the full potential of existing out of centre retail parks to deliver housing, and this is an approach that we're already pursuing in Charlton Riverside. Overall, the approach to town centres in policies SD6 to SD9 is comprehensive and effective and we welcome this more holistic approach.

Chapter 3 Design

- 1.7 We fully support the draft Plan's new approach to design, which correctly recognises that good design is indivisible from good planning. We agree that the design-led approach will ensure that proposals are appropriate to the local context and also based on existing/planned infrastructure capacity. We support the Mayor in seeking clear minimum space standards and taking a stronger stance than the current plan on residential design quality. We believe this is essential to delivering high quality homes for Londoners.
- 1.8 The new Agent of Change Policy D12 is welcomed. This is a necessary and effective means of ensuring that existing noise-generating uses, such as cultural venues and industrial sites, which are fundamental to London's success, are appropriately protected.

- I.9 We share the Mayor's view that buildings within London should achieve the highest standards of fire safety. To enable the effective implementation of this Policy D11, we would ask for further clarity regarding who can be considered a suitability qualified assessor. This is needed to enable boroughs to have the right type of resources in place to thoroughly evaluate statements.

Chapter 4 Housing

- I.10 The Royal Borough shares the Mayor's aspiration to deliver the new homes that Londoners need. Indeed, we already play a key role in achieving the delivery of new homes, with live planning permissions for over 24,000 new homes. We are committed to continuing to deliver high levels of housing growth to make a major contribution to London's housing provision.
- I.11 While we do not disagree with the assessment of overall housing need as set out in the 2017 London SHMA, we are concerned about the ability of the market to deliver against the proposed increase in our housing target to 3,204 net new dwellings per year. Our primary concern is with the modelling approach used to calculate the housing delivery target for small sites (Policy H2), which has resulted in an increase in the small sites component of the overall housing target from 226 to 681 dwelling per annum. This is an increase of 455 dwellings per year.
- I.12 The modelling approach relies on assumptions to predict future housing trends in London based on the introduction of a new small sites policy in the draft London Plan and the potential impact this could have on house building. We do not consider that introducing an untested policy on windfall sites will impact on the number of small sites coming forward by such a degree that the number of small sites brought forward for development in Greenwich will increase from 226 small sites to 681 per year. Even if the number of small sites brought forward did begin to increase with the introduction of this policy, it would be a gradual increase year on year not a sudden increase of 455 dwellings per year.
- I.13 Furthermore, it does not differentiate between tenure of existing stock for modelling purposes, and does not consider other barriers that smaller developers face in bringing sites forward such as financing, which would still have a significant impact regardless of the policy. For these reasons, we consider that the modelled approach to the small sites target significantly over estimates the amount of housing likely to be delivered from small sites. Therefore we do not consider it appropriately represents future housing trends in London.
- I.14 We are also very concerned that the new methodology is based on the conversion of family sized dwellings into smaller flats and building in back gardens; the Royal borough does not support either of these approaches. The conversion of family homes into single units is contrary to our Local Plan policies which seek to retain family housing, and policy H12 of the draft Plan which recognises the need for affordable family accommodation in London. While we acknowledge that household sizes are generally reducing, as set out in the 2017 London SHMA the number of households with children is still expected to grow significantly by 2041.
- I.15 In this context, a focus on subdivision of existing family housing is short sighted, particularly when combined with the draft Plan's suggestion that 2 bedroom units could be considered as family provision. While many families may live in smaller two bedroom homes, this is often because they cannot afford a larger home. In this context, it is particularly important the draft Plan reflects the need to retain and provide suitably sized homes so that families have a choice of accommodation. The Plan's housing target should not be reliant on the loss of family housing.
- I.16 Many boroughs, including Royal Greenwich, have chosen to introduce a policy in their local plan to make clear the circumstances in which back garden development may be appropriate. In contrast, the

draft London Plan assumes a blanket presumption in favour of back garden development without any detail of the circumstances in which this may or may not be appropriate. This will lead to inappropriate development in back gardens that will harm the amenity of adjacent occupiers.

- I.17 Residential gardens also provide vital green infrastructure functions such as reducing surface water flood risk, providing important habitat, and contributing to biodiversity and adaptation to climate change. The mitigation measures proposed where the loss of green space occurs as a result of small housing developments are narrowly focused on no net loss of green cover. This approach does not sufficiently recognise the multifunctional role of residential gardens, and the proposed approach would have serious negative environmental implications for the borough. Back garden development is not a regional issue and should be left for boroughs to deal with in their local plans.
- I.18 We strongly support the introduction of a strategic affordable housing target of 50% (Policy H5) to begin to address the need for more affordable homes in London. However, we are seeking clarity is needed with regards to public land delivering 50% affordable housing and whether this applies to sites that are disposed of as well as those brought forward by local authorities themselves.
- I.19 We support the inclusion of the threshold approach in the Plan, the early stage viability review and the proposed review mechanisms for developments that do not meet the threshold approach (Policy H6). This will help to ensure that affordable housing is maximised on all types of development. We welcome the introduction of a 50% threshold for industrial locations where land values are considerably lower, and the approach to embed affordable housing requirements into land values.
- I.20 We particularly welcome the recognition of the need for low cost affordable rented homes, and we urge the Mayor to further strengthen the approach so that the priority afforded to the delivery of genuinely affordable homes is explicit in Policy H7. It should be clarified that unless boroughs produce specific evidence/associated strategies that indicate otherwise, the default position is that the 40% 'borough-choice' tenure be delivered as social/London affordable rent. This means that boroughs who do not currently seek 70% of homes to be social/London affordable rent will not have to update their Local Plan policies to do so. This clarity will speed up the delivery of genuinely affordable homes.

Chapter 5 Social Infrastructure

- I.21 We welcome the explicit support for co-location of different forms of social infrastructure, and support the focus on partnership working to identify suitable sites for social infrastructure provision. However, we note the practical difficulties in identifying suitable sites both because of the increasingly pressurized land market and also because of the differing time frames which organisations plan for (typically 5 years maximum) versus Local Plan timeframes of 15+ years.
- I.22 We welcome the introduction of criteria regarding the design of spaces likely to be used by children and young people, and that there should be appropriate provision for different age groups (Policy S4). With population growth placing additional pressures on existing space, it is critical that new, well-designed play spaces and informal recreation opportunities are designed in from the outset. We would therefore encourage the Mayor to be more explicit regarding the importance of play provision on-site for all ages, and to set out clearer quality criteria alongside the benchmark of 10sqm per child, particularly in regards to provision for older children. In the context of increasing densities, financial contributions to improve existing provision are likely to be insufficient to support good growth.

Chapter 6 Economy

- I.23 We fully support the recognition of the role and priority afforded to the provision of both low cost business space and affordable workspace. We agree with the categorisation of Royal Greenwich as a 'retain capacity' borough for the purposes of managing industrial floorspace capacity. While we are

supportive of the principles underpinning Policy E7 (*Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function*), as currently drafted the policy and supporting text is not sufficiently clear to enable effective implementation of the approach.

- I.24 Without clarification, Policy E7 will not be effective in terms of providing the necessary industrial capacity across London to meet identified need and if not done properly may erode industrial capacity. It must be clear that intensification of designated industrial land (especially SIL) is a strategic priority in and of itself, rather than being encouraged as a means to transfer currently designated land to other non-industrial uses. It also needs to be clearer that it is the boroughs, in partnership with the Mayor, who are responsible for the leading role in identifying where there is scope for SIL/LSIS consolidation as a means of achieving strategic plan objectives.

Chapter 7 Heritage and Culture

- I.25 The fact that Heritage and Culture is given its own separate section emphasising its importance in driving good growth, is welcomed as a very positive step forward. Our experience of leading the delivery of the Woolwich Creative District demonstrates the real positive outcomes that can be achieved when heritage and culture are the driving force for regeneration, and we fully support the importance the draft Plan places on these interlinked issues.
- I.26 We welcome the new policy requirements for positive action for Heritage at Risk assets, considering significant archaeology in development and increased protection for designated views and for world heritage sites. We also welcome the promotion of new Creative Enterprise Zones (CEZs) and Cultural Quarters to anchor town centre renewal and policies to support and promote the night-time economy, as well as to protect cultural venues and uses, especially night-time venues, creative workspace and public houses.

Chapter 8 Green Infrastructure and Natural Environment

- I.27 We welcome the introduction of a green infrastructure approach (Policy G1) as a means of planning for and managing London's network of green and open spaces/features in an integrated way to meet multiple objectives. This overarching approach will ensure that the multifunctional benefits of green infrastructure are acknowledged and planned for effectively. We support the specific requirement for major development proposals to contribute to urban greening, and the introduction of an Urban Greening Factor as tool to identify requirements for new development (Policy G5).

Chapter 9 Sustainable Infrastructure

- I.28 While we support the policies within the chapter, the chapter as a whole would benefit from stronger links to Chapter 8, including clarify that Green Infrastructure and Sustainable Infrastructure and interlinked and mutually supportive. For example, there is little mention within the chapter of natural flood risk management as an effective tool. The chapter feels disjointed in terms of the approach to water and floor risk; it would aid coherency and consistency if policies on water were grouped together.

Chapter 10 Transport

- I.29 The Mayor's aim of 80% of Londoners trips being on foot or by cycle or by using public transport, by 2041, is both laudable and appropriately ambitious (Policy T1). The Royal Borough welcomes the Mayor's recognition that delivering the vision requires work from a wide range of organisations including the London Boroughs.
- I.30 The Boroughs have a critical role to play in developing and delivering local solutions and it is vital that this is recognised through improved Local Implementation Plan (LIP) funding allocations that recognise

the magnitude of the challenge in Outer London. Moreover, the LIP funding arrangements should be amended to ensure that those Boroughs most committed to, and successful in achieving, Mayoral aims are not financially disadvantaged as is currently the case.

- I.31 The Royal Borough supports the principle of higher cycle parking standards set out Policy T5. However there are concerns regarding their application to the Borough as a whole. The cycling corridor between Greenwich Town Centre and Woolwich and Thamesmead is an area of significant growth and has been identified by TfL as a route that will contribute to the growth of cycling in London.
- I.32 However this is not the case for the other parts of the Borough and cycle parking standards should reflect the variation that exists within borough boundaries. It is possible that additional cycle storage demands could however impact on the development density especially when considering non-standard cycle provision.
- I.33 The Royal Borough supports the principle of reducing car parking standards (Policy T6). However, we would highlight that delivery of high levels of growth at the same time as restricting parking needs to be considered within the context of wider restrictions of parking and the impact on existing residents. The policy should acknowledge that it is necessary to ensure adequate on street parking restrictions are in place when securing car free development.

Chapter 11 Funding the London Plan

- I.34 We fully support the Mayor's position that that viability testing should normally only be undertaken on a site-specific basis where there are clear barriers to delivery, and that applicants are required to provide evidence prior to submission of an application on the specific issues that would prevent delivery.
- I.35 We are disappointed that Policy DF1D makes no reference to the need for planning obligations to reflect local as well as strategic priorities. We do not consider it appropriate for the Mayor to set priorities for planning obligations in such a prescriptive way, and would question if the proposed approach accords with the relevant regulations regarding planning obligations. While it is appropriate for the Mayor to take an overview of the strategic priorities, this must not disregard the relevance of local priorities when seeking planning obligations.

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Appendix I Detailed Comments on Draft Policies

Policy/Paragraph Reference	RBG Comments
Chapter 1 Planning London's Future (Good Growth Policies)	
GG4D	Object to the requirement to identify and allocate small sites. This is an onerous requirement that boroughs currently do not have the resources to do, and the process of allocating sites in development plans is at least two years. There are other ways in which boroughs can support additional delivery on small sites.
GG5E	Clarification is needed on the requirement to establish build-out rates at the planning stage. It is unclear how this could be secured as part of a planning permission.
Chapter 2 Spatial Development Patterns	
SD7C	Support inclusion of Woolwich as potential Metropolitan Town Centre in Figure A1.1 and identification of North Greenwich as potential District Centre.
SD8A(4)	Support the redevelopment of existing out of centre retail and leisure parks to deliver housing intensification.
Chapter 3 Design	
DH2	Clarification is needed within the policy regarding which elements apply to preparation of development plans versus individual proposals. For example, all development proposals must undertake a contextual analysis to be successful, whereas the policy seems to imply that the requirement for an initial evaluation is limited to plan-making only.
DH2F-G	Support the requirement for design review and the principles which design review should adhere to. In particular, that design review comments need to take account of the wider policy context.
D3	Support this policy, which provides additional clarity in terms of how development proposals should achieve inclusive design (as compared to the current London Plan policy).
D4	Support the requirements of this policy, including minimum floor to ceiling heights of 2.5m and that the provision of single aspect units should normally be avoided. Such standards are essential to ensure adequate quality within the London context.
DH4C/3.4.11	Support the requirement that the listed qualitative aspects be addressed in the design of residential developments
D5	Support the requirement that 10% of new build dwellings meet category M4(3) and the remainder meet M4(2). The policy provides the necessary clarity regarding the exceptional circumstances that would justify flexibility in the application of the standards.

D6	Support the design-led approach to determining housing density, and note that there are additional requirements for proposals that go above the densities in the current London Plan density matrix. Welcome the explicit recognition that, where existing infrastructure capacity is insufficient to support proposed densities (including the impact of cumulative development), it may be necessary and appropriate to phase development so that it is contingent on the provision of the necessary infrastructure.
D7	Support the approach and criteria set out in the policy. While it is wide-ranging, we agree with the view that the quality of the public realm has a significant influence on quality of life and it is therefore appropriate and necessary to consider the matters set out in the policy, particularly in areas of high density development.
D8	Support the plan-led approach to defining what is considered a tall building, and identifying locations where tall building are acceptable in principles. Consider that the three-pronged approach (visual, functional, environmental) of assessing the impact of tall buildings set out in the policy is comprehensive.
D12	Support the Agent of Change principle, which places the responsibility for mitigating impacts from existing noise-generating activities/uses on the proposed new noise-sensitive development.
Chapter 4 Housing	
H1B(1)(a)/4.1.8	Lack of clarity. The requirement to ‘ <i>allocate an appropriate range and number of sites</i> ’ is vague and open to interpretation. The supporting text encourages boroughs to identify ‘ <i>as many sites, including small sites, as possible via their Development Plan documents</i> ’, and goes on to state that boroughs will be supported in using a small sites windfall assumption in their housing trajectories based on the small sites targets set out in Table 4.2. The supporting text needs to be clear that where it is not practicable or possible for boroughs to allocate any small sites, they may still use a small sites windfall assumption equivalent to the target in Table 4.2.
H1F	Support a presumption against single use low density retail parks, and encouragement for developments to be designed in a way that includes a mix of uses to make better use of the land.
4.1.6	Support approach to overseas investment and ensuring that Londoners have the opportunity to purchase homes first is welcomed.
H2	Whilst the Royal Borough agrees with the principal of encouraging smaller house builders into the housing market, it disagrees with the presumption in favour of small housing developments in the absence of a design code. This will lead to unsustainable development in inappropriate locations. Furthermore, there is no interim arrangement which allows local authorities time to produce a Design Code once the London Plan is adopted. The presumption in favour of small housing developments should not apply to conservation areas as this undermines the character of the area that the conservation area designation seeks to protect.
H2C	Object. The listed actions for increasing planning certainty on small sites are unnecessary and overly prescriptive, and have significant resource and time implications for Local Plan production. Parts B (the development of design codes) and D (the presumption in favour of certain types of small housing development) are sufficient to increase planning certainty on small sites.

H2D(2)(d)	Object. This encourages infill development within the curtilage of a house. This is contrary to the current London Plan policy 3.5 which states that boroughs may introduce a presumption against back garden development in Local Plans. Many boroughs, including Royal Greenwich, have chosen to introduce a policy in their local plan to make clear the circumstances in which back garden development may be appropriate. The draft London Plan assumes a blanket presumption in favour of back garden development without any detail of the circumstances in which this may or may not be appropriate. This will lead to inappropriate development in back gardens that will harm the amenity of adjacent occupiers. Back garden development is not a regional issue and should be left for boroughs to deal with in their local plans.
4.2.7	Text regarding conservation areas is insufficient and contradicts the presumption in favour of development.
H3	Support the introduction of this policy which recognises the difficulty boroughs with large sites have in meeting housing targets in terms of completions and that boroughs in London should not be penalised by the housing delivery test where delivery is constrained due to factors outside of their control. However, this policy is likely to have little effect as the DCLG propose to use the targets set out in borough Local Plans (taken from the London Plan) to inform the housing delivery test; it is unlikely the housing delivery test will take account of planning permissions as well as completions in meeting the target. The Mayor must continue to lobby the government to ensure that London Boroughs with large housing targets are not penalised through the housing delivery test. Support counting student and older people accommodation in contributing towards housing targets, recognising that this type of accommodation makes a contribution to housing need.
H4	As currently worded, this policy is inappropriate. Providing temporary housing on vacant development sites risks exacerbating the housing crisis by failing to deal with the lack of permanent affordable homes for Londoners. With no specified time period for this temporary use many of these temporary homes could become long term. This policy could be seen as providing an opportunity to provide housing on sites that would normally be deemed inappropriate and unsustainable under the pretence that they are temporary. This is likely to lead to pockets of poor quality sub-standard housing in poor locations that falls below design standards. This is not a sustainable approach to housing and will not create mixed and balanced sustainable communities. Furthermore, relocating to other sites once the temporary use has expired could be challenging, time consuming and costly.
H5	Support increase of the strategic affordable housing target to 50% to begin to address the need for more affordable homes in London. However, clarity is needed with regards to public land delivering 50% affordable housing and whether this applies to sites that are disposed of as well as those brought forward by the public sector itself.
H6	Support threshold approach, the early stage viability review and the proposed review mechanisms for developments that do not meet the threshold approach. This will help to ensure that affordable housing is maximised on all types of development. Welcome the 50% target for industrial locations where land values are considerably lower and the approach to embed affordable housing requirements into land values.

H7	Welcome the recognition of the need for low cost affordable rented homes, however RBG considers that a minimum of 30% social rent/London affordable rented homes is not sufficient. Whilst the policy allows boroughs to determine an additional 40% based on identified need, the supporting text states that there is a presumption that this will focus on Social Rent/London Affordable Rent. It should therefore be clarified that unless boroughs produce specific evidence/associated strategies that indicate otherwise, the default position is that the 40% be delivered as social/London affordable rent. This will ensure that delivery of genuinely affordable homes is maximised, and means that boroughs who do not currently seek 70% of homes to be social/London affordable rent will not have to update their Local Plan policies to do so (therefore speeding up the delivery of genuinely affordable homes).
H8	Support the recognition that in most circumstances the application of the vacant building credit will not be appropriate. Consider B and C are reasonable in the London context and provide the necessary clarity regarding the limited circumstances that would justify application of the credit.
H10C	Support the approach of policy H10 to re-provide the same level of affordable housing as the level lost.
H11C	Whilst RBG agree that holiday rentals can have a significant impact on the supply of homes, it is difficult to see how this policy would work in practice. Local authorities would not have the means to gather or monitor information on the number of holiday homes in the borough and particularly how many days they are used per year. Furthermore, local authorities would not have the power or resources to enforce such a policy.
H12/4.12.3	Question the justification for this shift in focus regarding housing size mix. Many families are likely to live in 2 bedroom homes because they cannot afford a 3 bedroom home in London. The statement in para 4.12.3 could encourage the provision of more 2 bed units and less 3 bed units which will only exacerbate the problem of the lack of affordable family housing in London. This paragraph contradicts the draft housing strategy which defines family sized housing as homes with three or more bedrooms. There is no evidence provided that the provision of smaller units frees up existing larger units for occupation by families as opposed to occupation by sharers.
H13	Support the general approach to Build to Rent development and the requirement for delivery of affordable housing on-site. However, concerned that the affordable housing provision on such schemes will be limited to intermediate rent and the impact this could have on meeting the priority need for social/affordable rent.
4.15.2	Welcome the acknowledgement of the role that new, non-specialist residential developments in accessible locations play in providing suitable and attractive options for downsizers/older Londoners.
H16	Concerned that the implications of a London-specific definition of gypsies and travellers which contradicts the Planning Policy for Traveller Sites (PPTS) has not been properly assessed. Local authorities must produce local plans that are in line with both national and regional policy, which would be impossible when the two definitions are contradictory. Furthermore, this would also make carrying out a gypsy and traveller needs assessment very difficult as these two definitions would require different methodologies and are likely to lead to different levels of need. A more strategic approach to gypsy and traveller accommodation is needed across

	London.
H18	Support the requirement for Sui Generis non-self contained market housing to provide affordable housing, however the level of requirement as it is not clear what a unit of shared living is. For example, a unit could be defined as a bedroom, or a unit could be defined as multiple bedrooms that share a communal kitchen. This needs to be clarified to ensure that this type of development is making a proportionate contribution to affordable housing.
4.18.2	What constitutes an 'identified market need' requires further clarification. It should be clear that proposals for this type of use should not displace the delivery of self-contained homes, and that investment interest does not constitute an identified market need.
Chapter 5 Social Infrastructure	
S1D	The explicit support for co-location of different forms of social infrastructure is supported.
S2A(4)	While we support the focus on partnership working to identify suitable sites, we note that these organisations typically plan for a maximum of 5 years ahead which can cause difficulties with identifying sites within Development Plans, both because of the minimum 2 year production timetable for DPDs and the longer time frame that must be covered.
S3A	The approach set out is sensible and the principles outlined are supported. However, finding suitable sites in suitable locations can be particularly challenging, and the options for expanding schools are becoming more limited (as many schools have already been expanded). While sites for new schools are factored into planning frameworks for growth areas, the time lag between a site being identified and it being operational can be considerable. Together these factors could inhibit the council from providing sufficient school places where they are needed.
S3B	Support the introduction of criteria which development proposals for new education and childcare facilities should satisfy. The creation of healthy routes to schools, for example, will ensure that children enjoy the benefits of increased physical activity and will help reduce childhood obesity.
S4B/para 5.4.5	The introduction of detailed criteria regarding spaces likely to be used by children and young people is generally supported. However there is a lack of clarity regarding the threshold of 10sqm per child. The supporting text advises that provision should be made in accordance with relevant development plan policies, and that 10sqm should be used as a basis for assessing future requirement. The policy wording should better reflect the supporting text.
S5A(3)	Support this new requirement for boroughs to maintain and promote the Walk London Network, as four of the networks (Jubilee Greenway, Thames Path, Capital Ring and Green Chain) have significant sections within Greenwich.
S5B	Support the inclusion of additional criteria concerning accessibility and co-location
S6	Support the provision of safe accessible public toilets that meet the needs of all members of the community.

Chapter 6 Economy	
E2	Support this policy and its explicit requirement to provide and protect a range of low-cost business space. Consider the criteria for proposals that involve the loss of existing B1 space are reasonable and effective. The stated minimum 12 month marketing period, however, is less than RBG's Local Plan and it would be useful if the policy clarified that longer marketing/vacancy periods may be required depending on local circumstances.
Table 6.2	Support the categorisation of RBG as 'retain capacity' and the associated requirement to seek to intensify industrial floorspace capacity following the general principle of no net loss across designated SIL and LSIS.
E5D	Clarification of the phrase ' <i>or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough</i> ' is needed. This implies that a planning application could seek to release SIL, which would undermine the plan-led approach and the robustness of the borough-level categorisations. As a minimum, what constitutes a 'masterplanning process' should be defined. Otherwise this statement conflicts with part B(1) of the policy which is clear that SIL boundaries can only be defined by the Local Plan and these boundaries should be used for decision making.
E7	<p>While RBG supports the principles underlying this policy, as currently drafted it is not sufficiently clear. While E7B and E7C clearly state that the process of SIL/LSIS intensification and consolidation to support the delivery of residential and other uses should be plan-led and not considered through ad hoc planning applications, para 6.7.2 refers to the need to have a development agreement in place between a residential and industrial developer to support the transfer of land.</p> <p>The supporting text needs revising to clarify that it is the boroughs, in partnership with the Mayor, who are responsible for identifying where there is scope for SIL/LSIS consolidation as a means of achieving strategic plan objectives. As opposed to developers/landowners seeking to promote transfer of land, simply because a development agreement is in place. Additionally, it should be further emphasized in the policy that the strategic priority for industrial land (especially SIL) is its intensification for industrial use. The current wording suggests that intensification is primarily encouraged as a means to transfer to other non-industrial uses, as opposed to a priority objective in itself.</p>
6.7.4	In common with E2, the requirement to demonstrate 'no reasonable prospect' should include a specified length of time for marketing of the site, and where appropriate be marketed for sale as opposed to lease only.
E9C	Support the requirement that A5 hot food takeaway uses should not be permitted within 400m walking distance of existing or proposed schools.
Chapter 7 Heritage and Culture	
HCIA	Clarification needed. The form of evidence required should be clearly defined, and example documents cited, to assist with implementation of this policy (and also successful implementation of Policy D2, which also requires evidence on the historic

	environment).
HCIB	This policy contains long and confusing syntax so that the gist of the policy is difficult to grasp. How can knowledge set out a clear vision? Suggest text is simplified so responsibilities of decision-takers and plan-makers are made more explicit.
HCID	<p>This policy states that ‘development proposals’ should identify assets of archaeological significance. Within the policies under HCI there is no provision for boroughs to identify and understand those assets themselves (for archaeology, only improving access is required under HCIA). Therefore the identification of archaeological assets as a statutory requirement is reliant on developers and applicants only. It is conceivable that information on archaeological assets could be omitted from development proposals. Therefore it is suggested that the requirement for boroughs to identify sites of archaeological interest and develop current APAs for decision-taking and plan-making (set out in 7.1.9) should be made a statutory requirement and moved to the Policy section. This would strengthen the protection for archaeological assets.</p> <p>This policy also states that undesignated archaeological assets equivalent to a scheduled monument (SAM) should be given equivalent weight to designated assets. How is status equivalent to a SAM measured and defined? How will boroughs know when to give an undesignated asset equal weight to a designated asset? This needs to be clarified.</p>
HCIE	Support the new requirement for boroughs to identify opportunities for heritage assets ‘as risk to contribute to regeneration and place making.
7.1.8	This paragraph repeats a similar paragraph within the NPPF. Surely all neglect is deliberate, i.e. a failure to care for something, an act of negligence. The presence of this word means that this policy does not get utilised often enough, due to the uncertainty surrounding the word ‘deliberate’.
7.1.11	Clarification required. How is a significant archaeological asset defined? If this equates to SAMs and to assets within a Tier I APA this should be indicated.
HC2	Support the strengthened protection for World Heritage Sites and their setting provided by this policy. Agree that it is appropriate that additional views beyond those identified in the London View Management Framework are set out in the relevant WHS Management Plan and considered as part of plan development and decision-taking.
HC5A	Support this new policy and its explicit focus on protecting and promoting cultural facilities throughout London, based on a wide understanding of what constitutes culture.
HC5B-C/7.5.12-7.5.13	Question if the definition of ‘creative industries’ included in the glossary is sufficiently detailed to enable effective implementation of this policy. The supporting paragraphs provide some clarity about the nature/type of space envisaged to be provided, however if this narrower understanding of creative industries isn’t reflected in the glossary definition there is a risk that the intent of the policy will be diluted.

HC6	Support the introduction of a positive and proactive policy relating to the night-time economy. Welcome the clear focus on diversifying the offer and consider that the identified criteria will together serve to deliver a more inclusive, enjoyable and wide-ranging offer than current approaches (which tend to focus on regulation rather than positive planning).
HC7	Welcome the recognition of the important role that public houses can have in a local area, and the proposed approach aligns with that currently taken in RBG's Local Plan. To strengthen the policy for protecting public houses, recommend that assessment of heritage/cultural/economic/social values (set out in 7.7.6) should be made a requirement and added to policy HC7A(1) so that there is an impetus for boroughs to identify pubs of value to local communities prior to development proposals coming forward. This would strengthen the protection for public houses.
Chapter 8 Green Infrastructure and Natural Environment	
8.3.2	There is lack of clarity regarding the principle of land swaps. As worded, it implies that applying an MOL designation to an existing green space would be sufficient. This would lead to an overall loss of green space
G5	Support introduction of the urban greening policy and use of Urban Greening Factor, however RBG considers there are some drawbacks with the approach that is currently set out in the Urban Greening Factor for London report.
Table 8.2	In identifying the factor associated with permeable paving, consideration should be given to whether the permeable paving is infiltrating or linked to a rainwater harvesting system. Permeable paving can also be a very effective treatment stage for water quality, which is a positive impact or if any trees planted within the paving area are linked underneath.
G6	RBG recommends that Policy G6 include a specific requirement for major developments to provide a net gain to the biodiversity of the site as a means of increasing biodiversity across the whole of London. This is in addition to the urban greening policy G5 for major developments and would encourage developers to choose urban greening elements with a higher biodiversity value.
G7B(2)	Clarification is needed to define what is a 'strategic location' in the context of this policy. Is this in terms of amenity, air quality, stormwater runoff, etc?
G8	Reference to interventions such as planting fruit trees or hedgerows would help to emphasize that food growing can also be integrated into more general landscaping/support other policies (e.g. G7 Trees and Woodlands) as well as by identification of dedicated space for food growing. The Orchard Project is a good example.
Figure 8.1	This diagram is not clear. Names should be included as well as numbers, and a link provided to the SPG.
Chapter 9 Sustainable Infrastructure	
S11A(1)(d)	Definition of what constitutes 'high levels of exposure' is necessary. Current wording could be interpreted as some exposure over the legal limit values is acceptable.

S11A(2)	It would be helpful for the policy to acknowledge where there are potential conflicts between design solutions in response to air pollution and other policy requirements (for example, filtered mechanical ventilation can conflict with the requirement for outdoor amenity space). The use of ‘large numbers of people’ is vague and could weaken application of the policy, particularly in relation to protecting vulnerable people.
S11A(5)	Support the requirement for AQAs to be submitted for all major developments. Clarification is needed to ensure that the policy reflects the requirement of para 9.1.4 that a preliminary AQA should be carried out with the aim of assessing (amongst other considerations) constraints imposed on the site by poor air quality. The inclusion of ‘ <i>unless they can demonstrate that transport...</i> ’ in the policy wording implies that some major developments could be exempt from the requirement to carry out a preliminary AQA.
S11A(6)/9.1.9	Guidance on what will be needed to demonstrate that off-site mitigation/payments are acceptable in lieu of on-site measures should be produced well in advance of adoption of the Plan to enable boroughs to apply this requirement effectively from the outset.
9.1.2	Support the aim of this, however unless there is a requirement for a cumulative assessment, most developments will not show via their assessments that they are causing new exceedances or delaying when compliance will be achieved.
S12A	It would be beneficial to set a similar minimum requirement for the ‘Be Clean’ element of the energy hierarchy; requiring developers to achieve a minimum emissions reduction (or energy generation) from renewable energy technology.
S12C	The request that residential and non-residential developments should aim to achieve a reduction in carbon emissions over Building Regulations of 10 and 15 per cent through energy efficiency measures is a step in the right direction. However, if the aspiration is to establish a target for developers to achieve, then the policy needs to be more strongly worded; requiring developers to achieve the relevant reductions (rather than it being an aim) unless they are able to demonstrate why it is not achievable. RBG recommends the use of the word “should” instead of “should aim to” in paragraph C.
9.2.1	Change of use and refurbishments have generally struggled to achieve emission reduction targets to the same extent as new-build. Therefore, whilst it may not be appropriate to require major refurbishments to achieve the same standards as new build, recommendations such as green leases in commercial buildings could produce a similar outcome.
9.2.7	RBG have experienced several cases where the cost of off-setting carbon emissions has been financially favourable for developers over reducing on-site emissions. The increase in the cost of carbon from £60/tonne to £95 may mitigate this to some extent, but it would also be helpful to provide developers with a set of minimum requirements that they must have considered before off-setting becomes acceptable.
9.2.9	A standardised tool issued by the GLA could reduce the financial cost and officer time associated with monitoring – this could potentially be secured through condition and funded through a Section 106 obligation. Monitoring should ideally commence at project completion, so that remediation can be implemented in a timely manner. Annual reporting will not provide adequate warning of a

	performance to allow for corrective measures.
9.2.10	Support clarity on minimum information requirements for energy strategies, however question if there is currently a robust standardised methodology to calculate embodied carbon.
9.3.4	In addition to the stated evidence for demonstrating the ability of a development to connect to a district heating scheme in the future, heat providers would benefit from knowing the building entry point for the heat connection. This will allow piping routes to be more accurately planned and provide more accurate cost estimates for connection.
9.3.8	The recognition that increased electrification of our heating and transport networks will put additional strain on our electrical infrastructure is reassuring. RBG would welcome additional guidance as to how developers can facilitate smart energy systems and support the accelerated deployment of demand side response.
S14	This policy should contain some reference to green infrastructure as a way of reducing overheating and reliance on air conditioning.
S15	Supporting text should mention measures such as rainwater harvesting and grey water to achieve lower water consumption rates.
S15D(2)	Thames Water needs to engage boroughs and set out its plans early so sites can be safeguarded or other opportunities explored before it is too late. There should be strategic planning of infrastructure needs which could be part of Integrated Water Management Strategies, but Thames Water must proactively engage with Boroughs.
9.5.2	A fittings based approach is not sufficient for water use efficiency. The internal and external design of buildings is also relevant as good design can lead to greater efficiency of water usage.
9.5.3	It is essential to understand, plan and implement new fully integrated water services infrastructure to support proposed development to avoid sewer and surface water flooding and increase water supply security in a more sustainable way. A coordinated and collaborative approach to investment and maintenance of infrastructure solutions between the relevant stakeholders will be required to meet this aim. IWMS can set the framework for achieving this, and the Mayor is encouraged to take a lead on this.
S17	Support the shift in focus to reducing waste generation and supporting the circular economy (as opposed to current policies that are concerned with waste management). Support the slightly higher targets than those in the current London Plan. Guidance on Circular Economy Statements should be produced well in advance of adoption of the Plan to enable boroughs to apply this new requirement effectively from the outset.
S18	Greenwich is part of the South East London Waste Group (SELWG), which already collaborates as recommended by the policy to pool member borough apportionment requirements. While there are some differences in the presentation of the apportionment targets between the current and draft London Plan which presents direct comparison, the latest version of the South East London Joint Waste Technical Paper (December 2017) demonstrates that, according to the modelled capacity for 2036, the SELWG will still be able to meet the new total combined apportionment target with a surplus. On this basis, Greenwich will not need to identify any

	further waste sites within the plan period and the apportionment targets are therefore supported.
9.8.17	Support the application of the Agent of Change principle to new developments proposed adjacent to existing waste sites.
S112A	Thames Water and TfL should be included in the list of agencies to collaborate with. Thames Water and TfL are defined in the Flood and Water Management Act as Risk Management Authorities. These have a different legal status to 'infrastructure providers'.
9.12.1	The role of LLFAs is incorrectly described in this paragraph. LLFAs are required to hold a register of flood risk assets. This is different from a register of flood risk. The LLFA does not identify areas of flood risk to help inform appropriate locations for development. This function is carried out through the SFRA. The LLFA has the Local Flood Risk Management Strategy (LFRMS) which identifies all known flood risk in the borough, but that document does not inform development.
9.12.6	Clarification needed. As worded, the paragraph could be read as suggesting a change in approach from current practices which is to ensure that evacuation plans are in place and moving people to upper floors is a last resort. Whereas it is assumed that the intent is to clarify that evacuation plans alone are insufficient to ensure resilience.
9.12.7	A minimum distance (or, if this is not practicable, an indicative distance) for the required set back to accommodate flood defences should be provided for clarity.
S117	This policy has overlaps with both S114 and S116, and it would seem sensible to combine these three policies insofar as possible for consistency and cohesion.
9.17.1	River restoration is also a good way to manage flood risk and should be mentioned.
Chapter 10 Transport	
Table 10.1	Support the inclusion of the DLR extension from Gallions Reach to Thamesmead, and urge the Mayor to adopt a more ambitious timescale for its delivery to unlock the significant development potential of the Thamesmead area.
T6B	A clearer definition of 'well-connected' should be included in the supporting text
T6.1G	The level of parking provision sought for disabled persons parking should be clarified and simplified.
T7E/10.7.2	Support regional consolidation and distribution centres. However, there are numerous examples of attempts to develop consolidation centres in London at the borough and sub-regional level and these have proven unviable. Consolidation can only be effective if led by and coordinated by the GLA and TfL through measures such as safeguarding or by securing through the planning process.