

APPENDIX 1

Albert Basin Development Framework SPG Representations from Public Consultation

Respondent	Address	Representations	Council's Response
1. Sortex Ltd	Represented by: Nathaniel Lichfield and Partners 14 Regent's Wharf All Saints Street London N1 9RL	<ol style="list-style-type: none"> 1. The general aims of the Royal Albert Basin Strategy are supported. 2. Concerned that the land-use principles for Gallions Quarter (page 10) and related masterplan drawings could conflict with the Sortex/LDA relocation strategy (relating to relocation of large scale manufacturing from the Olympic Masterplan Area). 3. The area designated for Sortex's relocation is currently earmarked for a mix of uses including smaller scale buildings, and is bisected by a landscaped east/west route, making it impossible to construct a new factory of the required size and shape. 4. Indicative masterplan should be amended to provide for the incorporation of Sortex's development requirement, which would require that the built form of B1/B2 uses can include larger units of the size required by Sortex. 5. The framework should indicate that a flexible approach to the massing and scale of the development site will be taken in order to accommodate a range of employment uses in the area. 	<ol style="list-style-type: none"> 1. Support welcomed. 2 – 5 Partially accepted. The illustrative masterplan drawing on page 10 is indicative only, and its function is largely to show the spatial extent of different land-use designations, rather than an accurate reflection of desired massing and scale quantity of floorspace for different uses. For clarity, it is proposed that the illustrations be amended to include the works 'Indicative Only'. Please refer to paragraph 1.3 of the Development Framework for further information. It is also proposed that paragraph 3.9, clause ii), be amended, by inclusion of the following sentence at the end of the clause: "A flexible approach to the massing and scale of the development on site will be taken in order to accommodate a range of employment uses in the area". It is also proposed that clause ii) be amended by insertion of the words "... including potentially larger units" after "in B1 and B2 uses...". Please note that paragraph 5.7 (Area 2: Gallions Quarter) already contains a reference in the second clauses to 'large scale employment uses for B1 and B2...'
2. SecondSite Property Holdings	Represented by: Planning Prospecti 24 Burton Place London W1J 6NE	<ol style="list-style-type: none"> 1. Suggest that as the Thames Gateway Bridge (TGB) forms a logical eastern boundary for the Framework Plan, that no proposals be shown on any of the Framework's diagrams or reference made to the area east of the TGB. 2. Concerned about possible confusion concerning proposals shown on pg. 10 and 12 "Armada" 	<ol style="list-style-type: none"> Points 1 and 2 accepted. It is proposed that illustrative references (pages 7, 8, 9, 10, 11, 12, 13, 17, 19, 27) to the area east of the Thames Gateway Bridge be deleted, and that the detailed master-planning of that area be included in future proposals for the redevelopment of phase 2 of the British Gas site, when these are

		<p>Development Area.</p> <p>3. Object to the proposal made in paragraph 4.14 ‘off-site developer contributions towards a new green grid public open space network’. Concerned that the provision of this compensatory public open space is located on their land. Consider that open space arising from the development of Albert Basin should be provided within the area itself.</p> <p>4. Similarly object to paragraph 4.25 ‘off-site developer contributions towards the creation of habitats...’. Consider that it would be more effective to incorporate suitable mitigation measures as part of the design of the proposal that would impact upon these ecological resources.</p> <p>5. Ask that in paragraph 6.4 that off-site open space and habitat replacement are removed from the heads of</p>	<p>developed.</p> <p>3. Not accepted. It is our experience that on most of the development sites in the Royals, the open space requirements arising from the individual proposals cannot be met on site without seriously undermining the overall economic viability of individual schemes, hence the need to identify strategic public open spaces off-site to address these open space deficits. The safeguarding of part of the Gas Works site Thames frontage for a future strategic open space was originally agreed as part of the Section 106 for the outline planning permission for the British Gas Works site in 1991, and is clearly reflected in the adopted Newham UDP, Policy OS1, and shown indicatively on the UDP proposals map. Policy UR3 of the UDP relating to Beckton Gas works includes a reference to the provision of open space on the site and the Council disagrees with the contention that such inclusion will prejudice the policy’s regeneration objectives for the site and the objector has provided no evidence to this effect. No change is therefore proposed.</p> <p>4. Not accepted. While the Council will require a high level of on-site mitigation to minimise impacts on biodiversity, this is unlikely to be of sufficient scale to compensate for loss of on-site biodiversity. Off-site developer contributions are a long-accepted method of minimising loss of biodiversity on a Borough level and proposed open spaces in the wider area provide an ideal opportunity to create new compensatory habitats. No change is therefore proposed.</p> <p>5. As 3 and 4 above. No change is proposed.</p>
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		<p>terms for possible inclusion in S.106 agreements, in keeping with the objections raised above.</p> <p>6. Object to page 19 paragraph 5.3 which suggests that the development of these sites will follow the construction of the TGB. Ask that these references be deleted from the Framework, as it is their intention to pursue the development of the Gasworks land in advance of the construction of the TGB.</p>	<p>6. Accepted. References on page 19 (paragraph 5.3) that “development sites to the north and east will follow the construction of the Thames Gateway Bridge..” etc will be deleted. Similarly, it is proposed that the fourth clause of paragraph 6.1, relating to ‘Phase 4 – Armada East once the Thames Gateway Bridge has been completed.’, be deleted.</p>
<p>3. IVAX Pharmaceuticals UK Limited</p>	<p>Represented by: FPD Savills 20 Grosvenor Hill London W1K 3HQ</p>	<p>1. IVAX relocated to the Royal Albert Basin area in 1997 as it was thought at the time that this would act as a catalyst for other pharmaceutical or research and development companies to re-locate to the London Docklands area. This has not occurred and IVAX are now isolated from other Research and Development companies. For this reason, the assumption within the draft Framework that this area can support media and pharmacology type industries is therefore flawed and should not be relied upon as a future inward investment opportunity.</p> <p>2. The draft Framework vision refers to the opportunities for the ‘Water City’. State that the IVAX site, due to its close location to the new retail centre at Gallions Reach, is therefore “...well located to contribute to the mixed use agenda and reflect the current development proposals adjacent to the site at Royal Quays, which is predominantly residential.</p> <p>3. It is argued that there is limited commercial value in live/work developments. State that there should not be an over reliance on live/work as a value generator to assist regeneration, and this should not be over emphasised within the framework as this is unlikely to be achieved.</p> <p>4. Paragraph 3.9 ii) should therefore be replaced with the following wording: ‘Gallions Quarter – A sustainable living and working community with residential,</p>	<p>1. Not accepted. The current proposals outlined in the Framework paragraph 3.9, clause (ii) merely provides an indication of uses that may be appropriate for Gallion’s quarter in the future, and these will not prejudice IVAX’s future plans. No change is therefore proposed.</p> <p>2. Not accepted. While the site may be well located for a potential mixed use redevelopment, the Council will consider any such proposals on their merits and this Framework does not prejudice such possibility. No change is therefore proposed.</p> <p>3. and 4. Not accepted. Live/work developments can potentially make a contribution towards the regeneration of this area. The assertion that such proposals are unlikely to be forthcoming are unsubstantiated. No change is therefore proposed.</p>

		<p>employment (including B1 and B2 uses), local amenities seeking to capitalise on the water environment and new open space network. New starter SME units will be encouraged including the formulation of a buffer zone between the Armada employment area and the residential areas within Gallions Quarter. Additional opportunities exist for a flagship hotel development within the new Royal Quay development. Leisure and sports uses might also be appropriate in this area’.</p> <p>5. Paragraph 5.9 of the draft Framework does not highlight the full extent of opportunities or land uses that would be appropriate within Gallions Quarter or within IVAX site ownership. Suggest new wording for paragraph 5.9 of the draft Framework should be amended as follows: ‘IVAX UK occupies the office building and laboratory. Vacant land fronts the River Thames and sits adjacent to Royal Quays. The warehouse is redundant. The vacant and redundant parts of the site would accommodate a mixed use development to include: residential, employment for smaller businesses, local amenities, open space to link with the wider open space strategy and waterfront activities. Any development would be expected to link with the public transport, footpaths, cycleways currently proposed within the Royal Quays site’.</p> <p>6. Paragraph 5.8 of the draft Framework refers to the development not exceeding heights of between 5 and 8 storeys and 64 AOD. Suggest that it would be more appropriate to provide clearer guidelines regarding the contributions of taller buildings to the streetscape.</p> <p>7. The document should make it explicitly clear that the floorspace is not a fixed requirement or limited to any particular use. It is IVAX’s understanding that the document is a framework and not a prescriptive guide to uses or floorspace.</p>	<p>5. See response to 2 above. No change is proposed.</p> <p>6. Partially accepted. It is not clear what purpose such guidelines would serve. However, for clarity, it is proposed that paragraph 5.8 be deleted, and replaced with the following: “Development heights should accord with the London City Airports requirements (please refer to the Council SPG “London City Airport Safeguarding, April 2005)”.</p> <p>7. Accepted. It is proposed that paragraph 3.3 be amended by the insertion of the following sentence after the first sentence: “The figures below provide a guide to the preferred uses and potential scale of development in the</p>
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		<p>8. Paragraph 6.1 refers to IVAX and the development potential taking place in later phases other than Phase 2. As a framework document, this wording should be reviewed in relation to IVAX as the potential for the surplus land to be realised could occur at anytime over the coming years.</p>	<p>Framework and it is not intended that these requirements be fixed or be prescriptively applied”.</p> <p>8. Partially agreed. The paragraph refers to the likely sequence of events only and does not preclude sites being brought forward in advance of the phasing plan. It is proposed that the last sentence of the clause (Phase 2) be deleted, to avoid reference to IVAX UK land.</p>
<p>4. Thames Water Utilities</p>	<p>Clearwater Court Ground Floor East Vastern Road Reading Berkshire RG1 8DB</p>	<p>1. Welcome the inclusion of Plan Objective 4, under paragraph 3.1 of the Framework. Consider that additional studies to identify infrastructure improvements should include take a strategic approach and look at wastewater infrastructure requirements for both this site and the adjacent SecondSite landholding to the east of the proposed TGB.</p> <p>2. Concerned about the importance of the Gallions Reach Pumping Station and a number of other operational buildings and plant in the area. Stress that the importance and probable permanence of this infrastructure asset should not be overlooked. If relocated, an alternative site would need to be found within 200m of the existing site, and the costs would need to be provided by the Partnership.</p> <p>3. The fourth bullet point under paragraph 5.9 of the Framework states that development will be encouraged to ‘bridge over’ the culvert with design solutions that allow Thames Water access for maintenance. Whilst welcoming the recognition that Thames Water must have unrestricted access, the proposed bridging is not considered acceptable.</p> <p>4. Concern that no mention is made in Section 4 of the Framework to the wider infrastructure requirements of</p>	<p>1. Partially accepted. While a future detailed site brief will detail the requirement and extent of water and waste water infrastructure, including the possible requirement of a new water pumping station to serve the Royal Albert Basin development, it is proposed that the following additional clause be added to paragraph 6.5 (Head of Terms for S106): “funding of a study on future water and wastewater infrastructure requirements, including a new pumping station, and contributions towards the provision of such infrastructure”.</p> <p>2. Noted. The importance of the Gallion’s Reach Pumping Station has not been overlooked and is planned to remain in its current position. The Cross Section A on page 31 of the Framework is purely illustrative. Detailed concerns raised by TWU will be recorded and taken on board in the future site briefs for the area. This level of detail is beyond the scope of this Framework.</p> <p>3. Accepted. It is proposed that reference in paragraph 5.9, 4th clause to ‘bridge over this culvert easement’ be deleted, so that the sentence reads, “... encourage developers to provide design solutions that allow Thames Water access for maintenance”. Rest of the clause to remain unchanged.</p> <p>4. Accepted. It is proposed that paragraph 6.3</p>

		<p>the development, particularly in relation to utilities infrastructure. Therefore scope of section 4 should be widened to provide reference to utilities infrastructure. Additional reference should be made to the need to ensure that the drainage of foul and surface water is separated in any new development.</p> <p>5. Emphasise that it is important to note that the presence and function of the Beckton Sewage Treatment Works is appreciated both by the local authority and developers.</p>	<p>(early enabling works) be amended by the addition of a further clause as follows: “Extension of the capacity, capability and provision of utilities infrastructure”. It is also proposed that clause (ii), paragraph 4.25 (Flood Risk and Sustainable Drainage) be amended by the addition of the following sentence at the end of the clause, “Applicants should also ensure that drainage of foul and surface water is separated in any development and surface water is disposed of (Please see London Plan policies on water, wastewater and sustainable drainage, Policies 4A.11-4A.13, 4C.8 for further information.</p> <p>5. Noted. This matter will most likely be addressed as part of the detailed pre-application discussion stage, in terms of detailed land-use designations, layout and design of sites, buildings and landscaping, in consultation with the Council’s Environmental Health Service. No change is proposed.</p>
5. Greater London Authority	City Hall The Queen’s Walk London SE1 2AA	<p><u>Titles and Plans</u></p> <p>1. The document should be known as ‘Royal Albert Basin Development Framework’ as it is a framework and not a prescriptive plan.</p> <p>2. Later versions of the Framework should include an existing plan to aid orientation of the proposed developments.</p> <p>3. There should be photographs of the existing Royal Albert Basin and surrounding areas/buildings which also will aid orientation.</p> <p>4. Some of the illustrative material is limited in value or needs better amplification.</p>	<p><u>Titles and Plans</u></p> <p>1. Accepted. It is proposed that reference to “Plan” throughout the document is deleted.</p> <p>2. Accepted. It is proposed that an extra page be inserted between existing pages 6 and 7 showing an existing plan to and orientation of the proposed developments, at a scale to match the ‘framework illustration’ shown on page 7 of the draft document.</p> <p>3. Accepted. It is proposed that an extra page is inserted between existing pages 6 and 7 showing an aerial photograph of the framework area, to aid orientation.</p> <p>4. Accepted. It is proposed that the computer-generated modelling diagram for the 4 development areas be oriented and annotated and the illustrative diagrams be produced at a larger scale.</p>

		<p><u>Housing</u></p> <p>5. There should be reference in the 'Housing Requirements' section to the GLA's draft SPG on affordable housing.</p> <p><u>Urban Design</u></p> <p>6. In relation to the Gallions Roundabout (one of the Mayor's proposed 100 Public Spaces), the cumulative impacts of the public transport infrastructure must be fully evaluated and addressed.</p> <p>7. The open space proposed must link into the broader open space framework, including the emerging Green Grid for East London and the landscaping to be associated with the Thames Gateway Bridge.</p> <p>8. The open space quantitative requirement cannot be met as part of the framework and off site contributions to public space may need to be delivered.</p> <p>9. The landscape grid proposed within the framework must</p>	<p>In relation of 1 – 4 above, please note that the above changes are conditional on additional funding becoming available.</p> <p><u>Housing</u></p> <p>5. Accepted. It is proposed that the second sentence of paragraph 4.3 be amended by addition of the following at the end of the sentence: "and the GLA's SPG on affordable housing (November 2005).</p> <p><u>Urban Design</u></p> <p>6. Accepted. It is proposed that a clause be added after the first clause of paragraph 5.3 (part of Area 1: Armada) as follows: "In relation to the area around Gallions Roundabout (one of the 100 London Public Spaces referred to above), the cumulative impacts of the public transport infrastructure on public access and public realm must be considered. Links to the Royal Albert Basin and other areas from Gallions Reach DLR station and across the Gallions roundabout must be fully evaluated and addressed. Pedestrian and non-vehicular routes need to be developed to overcome the barrier that the extensive A1020 creates".</p> <p>7. Accepted. It is proposed that the following sentence be added at the end of paragraph 4.12 (Open Space) as follows: "As a general principle, significant open space proposals within the Framework area must incorporate measures to maximise linkages with the emerging Green Grid for east London and landscaping on areas immediately adjoining the Thames Gateway Bridge should be compatible in landscape and ecological terms with that proposed as part of the bridge proposals".</p> <p>8. Accepted. This requirement is already clearly stated in the last part of paragraph 4.14. No change proposed.</p> <p>9. Accepted. It is proposed that paragraph 5.3,</p>
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		<p>deliver multiple amenity and play areas.</p> <p>10. There will need to be ongoing dialogue with the Thames Gateway Bridge team to ensure that joint design objectives are met including the provision of access points to the Bridge.</p> <p>11. The school block should be denser and/or have more activity on the roof and the lack of residential and private residential amenity space could be mitigated by accessible roof space.</p> <p><u>Regeneration</u></p> <p>12. While the development broadly meets the objectives for the Royal Docks Opportunity Area and the Beckton ‘Area for Intensification’, it is important to ensure that the development has links and synergy with existing businesses and the surrounding communities.</p> <p><u>Environmental Issues</u></p> <p>13. The framework should draw attention to the need for planning applications to address air quality and noise issues.</p>	<p>clause 5 be extended by the addition of the following sentence: “This should be designed in a manner that maximises its potential to provide formal play areas, informal recreation and wildlife habitat”. Please also refer to existing paragraphs 4.13 and 4.15.</p> <p>10. Accepted. It is proposed that paragraph 5.3, clause 7 be amended by the addition of the following sentence at the end of the clause, as follows: “There will need to be ongoing dialogue with Transport for London (Thames Gateway Bridge team) to ensure that joint design objectives are met including the provision of access points to the Bridge”.</p> <p>11. Partially accepted. The school plot/building design indicated is for purely illustrative purposes. The principal of mitigating lack of private amenity space through the provision of accessible roof space is already covered in paragraph 4.15, last sentence. No change.</p> <p>12. Noted. Detailed linkages and synergy with existing businesses will be developed/detailed in the emerging Area Action Plans for East Beckton and the Royals/Thameside West respectively in due course.</p> <p>13. Accepted. Although the requirement for appropriate assessments for noise and air quality are included in the ‘Environmental Sustainability Checklist for Major Development SPG 2004’ referred to in paragraph 4.25 (Environmental Sustainability, it is proposed that paragraph 6.6 (Supporting Documents), be amended by the addition of the following:</p> <ul style="list-style-type: none"> ● Air Quality Assessment ● Green Travel Plan ● Environmental Code of Construction ● Ecological Statement and Related Action Plan
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		<p><u>Transport for London's comments</u></p> <p>14. TFL supports in principle the Framework which places high-density development on sites which are near to the public transport interchange.</p> <p>15. Supports the prioritisation of a public transport interchange for a focus of redevelopment around the station.</p> <p>16. The future East London Transit alignment should be identified as possibly carrying on over the Thames Gateway Bridge.</p> <p>17. The future DLR alignment is only shown as the more northerly option. This should be amended to also indicate the more southerly alignment, which is at present the preferred option.</p> <p>18. The document should clearly state that any development proposals must ensure that an integrated pedestrian and cycle network is delivered.</p> <p>19. Paragraph 3.4 refers to a circular route for future bus services. The word 'circular' is misleading in this context.</p> <p>20. The area identified as 'Royal Albert Island' is served directly by only one bus route (currently 474) which runs along Woolwich Manor Way. The public transport link should be identified along with the key pedestrian</p>	<ul style="list-style-type: none"> • Lighting Impact Assessment • Noise Action Statement • Sustainability Framework (please refer to the Environmental Sustainability Checklist for Major Development SPG: L.B. Newham 2004). <p>14. Support welcomed.</p> <p>15. Support welcomed.</p> <p>16. Accepted. It is proposed that the 'Accessibility and Movement' Map on page 8 is amended to show the East London Transit alignment possibly carrying over the Thames Gateway Bridge.</p> <p>17. Not Accepted. The Map on page 8 indicates the Council's preferred route. However, the map is indicative only and shows only a potential route. It is both premature and difficult to consider alternatives when TfL has not presented their proposals publicly, the status of the proposals are unclear, and possibly subject to yet further change. The map does not preclude the incorporation of a confirmed southern aligned preferred route at a later stage. No change is proposed.</p> <p>18. Accepted. The Framework already adequately addresses this issue in several places and it is a key principle. No change is proposed.</p> <p>19. Accepted. It is proposed that reference to a 'circular' bus route in paragraph 3.4 is deleted.</p> <p>20 – 22. Noted. These issues can more appropriately be addressed at a more detailed design stage later in the planning process. No change is proposed.</p>
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		<p>accesses to the stops.</p> <p>21. Development of the bus network throughout the area has been identified as important. Principal routings should be identified and agreed with TFL prior to the highway network being finalised, along with bus stop and infrastructure facilities.</p> <p>22. Supports a segregated alignment along Armada Way, which will help reduce delays to bus operations.</p> <p>23. The Framework should also include text to make it clear that supporting retail will be scattered throughout the larger areas of residential and employment areas.</p> <p>24. Supports the principle of substantial development in the areas adjoining the Thames Gateway Bridge.</p> <p>25. Paragraph 4.10 identifies the need for the density of development to be related to PTAL level. The document should also refer to further transport analysis, either through a wider area Transport Strategy and/or individual Transport Assessments.</p> <p>26. Welcomes the restraint based approach towards parking provision.</p> <p>27. The detailed design of the Gallions Reach station and future interchange must be developed in partnership with TFL.</p> <p>28. It is important to note that a maintenance easement of five metres either side of the Thames Gateway Bridge viaduct will be required. Any land uses taking place beneath the Bridge would need to be controlled with regard to maintaining the safety of the Bridge and its users.</p> <p>29. Supports the phasing of this area as outlined in the Framework, which brings forward development of sites</p>	<p>23. Noted. The Framework already indicates that there will be convenience retail at Gallions Reach and Albert Island. No change is proposed.</p> <p>24. Support noted.</p> <p>25. This is already clearly indicated in the Framework, as indicated in Page 28, paragraph 6.6. No change is proposed.</p> <p>26. Support welcomed.</p> <p>27. Accepted. It is proposed that the following clause is added to the end of paragraph 5.3 (Area 1: Armada) as follows: “The detailed design of any proposals in Armada should be developed in close liaison with Transport for London (TfL), as it is particularly important that this area is developed so that it meets both TfL’s operational requirements and delivers a high quality environment for pedestrians”.</p> <p>28. Noted. This is a detailed matter which can be more appropriately addressed at application stage. No change is proposed.</p> <p>29. Support welcomed.</p>
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		<p>near the public transport hub first, and those located further away to be developed as later phases.</p> <p>30. The inclusion of DLR, East London Transit, buses, highway, pedestrian and cycle provision, in the list of measures to be considered to receive funding through S106 agreements, is welcomed and supported.</p> <p><u>Other Comments</u></p> <p>31. The need for children’s play space should be explicitly recognised.</p> <p>32. Further versions of the Framework should also reinforce that any development proposals must adhere to the principles set down in the document.</p>	<p>30. Support welcomed.</p> <p><u>Other Comments</u></p> <p>31. Noted. The issue is explicitly addressed in paragraph 4.13 (open space). No change is proposed.</p> <p>32. Noted.</p>
6. Docklands Light Railway	PO Box 154 Castor Lane Poplar London E14 ODX	<p>1. The preferred route option for extending the railway eastwards from Gallions Reach towards Dagenham Dock is a southern route in tunnel under the River Roding connecting into the planned Barking Riverside area.</p> <p>2. Request that the Framework seeks to protect its potential route expansion, particularly in the area immediately east of Gallions Reach Station.</p> <p>3. Request that the framework protects a corridor of land adjacent to or under the viaduct at Gallions Reach Station for future DLR development. (indicative map attached)</p>	<p>1-2 Please refer to the Council’s response to the GLA (answer to objection 17). No change is proposed.</p> <p>3. Noted. The Map is indicative only. Those requirements can more appropriately be addressed at detailed proposals stage. No change is proposed.</p>
7. Transport for London (Street Management)	Windsor House 42-50 Victoria Street London SW1H 0TL	<p>1. From a safety viewpoint straight roads should be avoided unless speed restraint can be built into the design.</p> <p>2. The main highway transport concern would appear to be the disappointing vision that it is unlikely that public</p>	<p>1. Accepted. It is proposed that an additional sentence is included in the fourth clause of paragraph 5.15 (Royal Albert Island) which states: “Vehicular access to the island will be from Woolwich Manor Way (close to the existing access) with a grid of streets providing views of the Docks, Basin and River. <u>The street design must incorporate speed restraint measures, including traffic calming</u>”.</p> <p>2. Noted and recorded. It is the Council’s</p>

		<p>transport will serve the Royal Albert Island. The together with higher than necessary parking provision and a network of car dominated streets will counter against the sustainability arguments promoted for this new era of developments and will lead to higher than necessary car trips.</p>	<p>intention, despite the existing apparent limitations, to work towards the provision of public transport on the island, and the following amendment is proposed to reflect this intention: “It is unlikely that public transport will serve the island, <u>(although the Council will explore all potential options with TfL to promote public transport in the area)</u>, and existing bus stops on Woolwich Manor Way <u>may</u> need to be retained...”</p> <p>It is also proposed that paragraph 4.22 (parking) be amended by the inclusion of the following sentence at the end of the paragraph: “Notwithstanding the above formal maximum parking standards the Council will encourage parking provision below maximum standard and where appropriate car-free development, and will require applicants to explicitly address their potential inclusion not only as part of a Transport Assessment including Green Travel Plans (see Supporting Documents Required, paragraph 6.6), but also as part of a broader ‘Sustainability Framework’ required for developments over a certain threshold (please see paragraph 4.25 below, with reference to the SPG).</p>
<p>8. Funcraft (UK) Ltd Tereza Joanne</p>	<p>King George V Dock Woolwich Manor Way London E16 2NJ</p>	<ol style="list-style-type: none"> 1. The vessel Tereza Joanne is moored in King George V Dock. The Company Funcraft (UK) Ltd has a long term lease for the vessel, the mooring, car park and land based storage areas. The lease was granted in 1997 from RODMA. This is not mentioned on the plans. 2. Comments made in the Framework with regard to access through security gate 14 have also ignored our presence and needs. 3. The vessel is clubhouse for Jetskiing members and is also used throughout the week and weekends. Access and car parking must be available 24/7. 4. Concerned that previous work undertaken by the Council and contractors (Sir Steve Redgrave Bridge) 	<p>1 – 4. Accepted and noted. It is proposed that the following clause is added to paragraph 5.15 (Area 4: Royal Albert Island), just before the last clause of the paragraph: “A jetsking company Funcraft (UK) has a long-term lease for their vessel which is moored at the eastern end of King George V Dock and adjoining mooring, car-parking and land-based storage area. The Council will require that application proposals in the area minimise disruption to this existing business, and where appropriate, carry out effective consultation with the company, particularly in relation to dock edge reclamation proposals and issues relating to security</p>

		took many years and caused serious disruption to our business with very little consultation from either the Council or the contractor.	Gate 14, which may affect the company's interests".
9. London Borough of Redbridge	John Pearce Head of Planning Policy PO Box 2 Town Hall Ilford Essex IG1 1DD	1. The Authority is in favour of the Framework, provided the application requirements for Transport Assessments remain as do the inclusion for relevant s106 agreements.	1. Support welcomed and comments noted.
10. Thames Gateway Bridge	Transport for London Thames Gateway Bridge Parnell House 25 Wilton Road London SW1V 1LW	<p><u>Cover</u></p> <p>1. Design of the Thames Gateway Bridge photomontage does not reflect the reference design that TfL submitted with the planning application to Newham Council on 12th July 2004. Please amend to make it consistent with the application.</p> <p><u>Introduction Page 4</u></p> <p>2. The second sentence in para 1.3 dealing with the SecondSite land ownership says that the land ownership says that the land use proposals in the SPG are for illustrative purposes only and as such are not formal framework proposals. This weakens the value of the SPG with respect to land east of the Thames Gateway Bridge.</p> <p><u>Development Uses and Grain Page 10</u></p> <p>3. Paragraph 3.9 TfL supports the proposed substantial urban industrial area accommodating large scale employment premises for B1 – 8 uses in the areas adjoining TGB. TfL also supports the area of residential, live work units around the Gallions Reach interchange.</p> <p><u>Area 1 Armada Page 19</u></p> <p>4. TfL supports the design concept of roads and development flowing beneath the TGB as shown on page 19.</p>	<p>1. Accepted. Amend cover and page 29 of the Framework Plan in liaison with TfL to reflect application design.</p> <p>2. Noted. It is intended to delete reference to SecondSite land on this Masterplan since discussions on the future development of land east of the Thames Gateway Bridge are still in their infancy, and it is not intended that this Masterplan will precipitate these discussions. See Council response to SecondSite Property Holdings (objector 2 above) for further information.</p> <p>3. Support welcomed.</p> <p>4. Support welcomed.</p>

		<p>5. TFL will require a maintenance easement five metres either side of the TGB viaduct.</p> <p>6. Para 5.4 note that the PLA radar mast needs to be shown on the axonometric plan page 19.</p> <p><u>Phasing and Section 106 Heads of Terms Page 27</u></p> <p>7. Para 6.1 TFL supports “Phase 4 Armada East once the Thames Gateway Bridge has been completed”.</p>	<p>5. Accepted. Insert the following in paragraph 5.3 (second last clause): “TfL will require a maintenance easement five metres either side of the Thames Gateway Bridge viaduct.</p> <p>6. Accepted. The axonometric map on page 19 will be amended to show the PIA radar mast.</p> <p>7. Noted. Please refer to the Council response to SecondSite information. The sentence referred to is proposed for deletion.</p>
11. Union Railways (North) Limited	2 Ossulston Street London NW1 1HT	<p>1. No objection in principle.</p> <p>2. We have previously responded in respect of the proposed TGB. See letter dated 13th August 2004. The observations there in connection with vehicular traffic and other highways considerations are relevant in terms of development of the Albert Basin.</p>	<p>1. Noted</p> <p>2. Noted. Your representation will be kept on file as it will be relevant to future detailed discussions over the development of Albert Basin.</p>
12. Port of London Authority	Bakers’ Hall 7 Harp Lane London EC3R 6LB	<p>1. The length of riverside covered by the draft SPG does not include any viable cargo wharves or sites capable of being made viable for cargo handling. The PLA accepts that it would not be practical to introduce cargo handling uses in this area.</p> <p>2. The SPG area does not include any passenger piers. Site proposal T32 of the UDP supports the creation of two river bus stops within the SPG area at Gallions Pier and Beckton Gas Works. The PLA would support the inclusion of these piers in the SPG.</p>	<p>1. Noted.</p> <p>2. Partially accepted. It is proposed to include a reference in paragraph 3.7 (Land and Water relationships) to the following: “constructing a new pier/river bus stop on a yet undefined location on the Thames frontage, outside the London City Airport Public Safety Zone (please refer to the London City Airport Safeguarding SPG (2005) for further information”. The existing Gallion’s Piers is now regarded as an unsuitable location for an upgraded pier, since it is located in the London City Airport Public Safety Zone where new development is highly restricted. However, as inferred about, there is potential for the construction of a new pier/river bus stop. This is already reflected in</p>

		<p>3. Given the considerable cost of constructing a new pier, it is appropriate that the SPG refers to the creation of a pier/river bus stop in the heads of terms for s106 on page 28.</p> <p>4. The creation of a new slipway is supported.</p> <p>5. The SPG should require developers to provide riparian life saving equipment (such as grab chains, access ladders and life buoys) along the river and dock sides to a standard recommended in the 1991 Hayes Report into River Safety.</p> <p>6. New piers/jetties should include space for short stay visitors.</p> <p>7. The SPG should require developers to consider using the river to bring in construction material and remove demolition and excavation spoil.</p> <p>8. The SPG includes reference to terrestrial reed zones and operations which would or might have the effect of causing land to be submerged by the waters of the Thames at mean high water require the PLA's consent.</p>	<p>the Heads of Terms for S.106, paragraph 6.5, clause 1.</p> <p>3. See 2 above.</p> <p>4. Support welcomed.</p> <p>5. Accepted. It is proposed that a new clause be inserted in paragraph 3.7 between the last and the second last clause as follows: "Addressing river safety issues: Developers will be required to provide riparian life saving equipment (such as grab chains, access ladders and life buoys) along the river and dock sides to a standard recommended in the 1991 Hayes Report on the Inquiry into River Safety". It is proposed that this be reflected in the 'Heads of terms for S106, paragraph 6.5, by insertion as a second clause as follows: "the provision of life saving equipment in accordance with paragraph 3.7 above".</p> <p>6. Not accepted. This is a detailed design issue more appropriately addressed at application stage.</p> <p>7. Not accepted. This is a detailed issue more appropriately addressed through planning conditions and/or a Construction Code of Practice at application stage.</p> <p>8. Accepted. It is proposed to include an appropriate reference at the end of paragraph 3.16 as follows: "It should also be noted that proposals for the creation of terrestrial reed zones, particularly where these form part of a managed retreat of the flood defence line, may require the consent of the Port of London Authority (PLA). Under Section 75 of the Port of London Act 1968 (as amended) operations which would or may have the effect of causing land to be submerged by the waters of the</p>
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			Thames at mean high waterway require the PLA's consent. Similarly, any works in, on, or over the mean high water mark will require the benefit of a PLA river works licence".
13. Metropolitan Police	Crime Prevention Office East Ham Police Station Roger.weatherly2@met.pnn. police.uk	<ol style="list-style-type: none"> 1. With reference to the Armada area, on Page 19, it is stated that " limited open storage may be allowed under the Thames Gateway Bridge". I would advise against such storage, as this may lend itself to acts of terrorism. 2. Is there designated parking for parents dropping off children at school? - if not, residential parking areas will be used. 3. My experience of gated underground parking leads me to believe that, unless the timing of the automatic closure is correctly set, there will be incidents of tailgating by unauthorised persons. 4. As a consequence, will the access from the underground car parks into the main body of the building be controlled. 5. There is a history of youths swimming in the docks, with fatalities. 6. Whether recordable CCTV is considered for the plan. 	<ol style="list-style-type: none"> 1. Accepted. It is proposed that reference in paragraph 5.3, fourth clause, that "limited open storage may be allowed under the Thames Gateway Bridge", be deleted. It is also proposed that the above sentence be replaced with the following: "Security and crime prevention concerns should be addressed in the detailed design stage of proposals under, adjoining or otherwise in close proximity to the Thames Gateway Bridge". 2. Accepted. It is proposed that an additional sentence be inserted to the end of paragraph 4.31 (local education provision) as follows: "A designated parking area for parents dropping off children at school should be provided to avoid overspill into surrounding residential areas". 3. and 4. Noted. This is a matter more appropriately addressed at application stage, (the Metropolitan Police is consulted on significant proposals). 5. Noted. This is detailed matter more appropriately addressed at application stage when the Metropolitan Police will be consulted for comment. 6. While recordable CCTV has not been considered to any extent in the Framework, it will need to be addressed at more detailed stages/application stage. However, it is proposed that paragraph 6.4 (Heads of Terms for S106) be amended by the inclusion of 'CCTV' in the list of headings.

		<p>7. Whether there will be vehicular access to the docksides, again historically, problems have been experienced within similar developments, whereby vehicles would use the pedestrian walkways as a road. This problem was alleviated by the installation of barriers and raising bollards, however, the emergency services were still afforded entry.</p> <p>8. Whether there will be access control installed to all multi occupancy residential buildings.</p> <p>9. Whether the docksides are subject to a public right-of-way, or in the public domain.</p> <p>10. Whether the affordable housing will require a Secured by Design certificate, if so, such certification would have to be processed through the Crime Prevention Office at East Ham Police Station.</p>	<p>7. Accepted. It is proposed that paragraph 3.7 (Land and Water relationships), fourth clause, be amended by the addition of the following sentence “Emergency services will require access to the dockside/riverside, but vehicular access will need to be strictly controlled through the installation of barriers”.</p> <p>8. Noted. It is proposed that paragraph 4.8 be amended by the inclusion of the following at the end of the paragraph: "Access control should be installed in all multi-occupancy residential buildings, as a security measure”.</p> <p>9. Yes. The Framework indicates this in paragraph 3.7, and is an underlying principle of the documents. No change proposed.</p> <p>10. Noted. This is a detailed matter more appropriately addressed at development control/planning application stage. No change proposed.</p>
<p>14. Environment Agency</p>	<p>Apollo Court 2 Bishop’s Square Business Park St Albans Road West Hatfield Herts. AL10 9EX</p>	<p><u>Flood Risk</u></p> <p>1. Development in the Albert basin area should not create an overall reduction in the area of the locks as this will reduce the volume of tidal flood storage capacity within the tideway.</p> <p>2. Section 1.8 – it should be remembered that although that flood defences can reduce, but not remove, the risk of flooding as there remains a residual risk of a breach of the defences or overtopping. The probability of such an occurrence is considered low but the consequences would be very significant.</p>	<p>1. Accepted. It is proposed that the Section: Albert Basin, page 23, be amended by the insertion of an additional clause after the first clause as follows: “Development in the Royal Albert Basin should not create an overall reduction in the area of the locks as this will reduce the volume of tidal flood storage capacity within the tideway”. Please note that the current Framework proposals do not result in an overall reduction in the area of the locks – the above amendment is for clarity.</p> <p>2. Accepted. It is proposed that paragraph 4.25, clause (ii) on Flood Risk and Sustainable Drainage, should include the following sentence at the end of the clause “Applicants should design their proposals, in liaison with the Council and Environment Agency, in a manner that minimises flood risk to the proposal and its occupiers, through the implementation of flood resilient construction</p>

		<p>3. Development should take place within the lowest flood risk area possible in line with the sequential test requirement in PPG25. Proposals to include residential accommodation on the lower levels of new development are of particular concern. As a Strategic Flood Risk Assessment has not yet been produced for the borough it is difficult for these issues to be properly addressed including the application of the sequential test.</p> <p>4. Section 3.7 – welcome the identification of the possible raising of the flood defences to address climate change, although the text should be changed to recognise that the level increase may be subject to change.</p> <p>5. There is a stated intention to replace the existing flood barrier with lock gates. Standard lock gates would be unsuitable and any structure to replace the recently refurbished flood barrier must be to no lower standard than which currently exists.</p> <p>6. Section 2.10 – if this includes residential development on the lower levels this may conflict with minimising the residual risk of flooding to occupants of the developments.</p>	<p>(please refer to Strategic Planning for Flood Risk in the Growth Areas, Insurance Considerations July 2004, Association of British Insurers, telephone 020 7600 3333). As a general principle, development should take place within the lowest flood risk area possible in line with the sequential test requirement in PPG25 Proposals for residential accommodation on the lower levels of new development require careful consideration. A Strategic Flood Risk Assessment has been produced for East London which provides more specific guidance on how these issues can be properly addressed”.</p> <p>3. Noted. See 2 above.</p> <p>4. Accepted. It is proposed that paragraph 3.7 first clause, be amended as follows “It should be noted that the level increase may be subject to change”.</p> <p>5. Accepted. It is proposed that the following statement be inserted at the end of the second clause of paragraph 3.7: “Standard lock gates would be unsuitable and any structure to replace the recently refurbished flood barrier should be to no lower standard than which currently exists”.</p> <p>6. Noted. However, this issue should appropriately be addressed as part of the Flood Risk Assessments for individual developments on which the Environment Agency will be consulted by the Council’s local planning</p>
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		<p>7. Section 2.13 - the required set back of built development from the flood defences should be achieved for operational access including the sustainable repair, raising and replacement of the flood defences in line with London Plan Policy 4C.7.</p> <p><u>Biodiversity</u></p> <p>1. Overall, the Agency requests that a specific section is included to cover ecology within the SPG area and in particular special policies with regard to the Thames.</p> <p>2. Opportunities should be investigated that include sustainably improving the river frontage such as lowering the river wall and terracing with native appropriate species.</p> <p>3. We feel that water lilies may be inappropriate in this area. A more holistically suitable planting scheme should be considered, such as the creation of a reedbed or other native planting scheme.</p>	<p>authority. No change proposed.</p> <p>7. Accepted. It is proposed that clause 4 of paragraph 3.7 be amended by the insertion of the following at the end of the sentence after 'maintenance': "and required set-back from the flood defences for operational access including sustainable repair, raising and replacement of the flood defences".</p> <p><u>Biodiversity</u></p> <p>1. Not accepted. The Council's requirements for ecological assessment are adequately described in the Council's SPG 'Environmental Sustainability Checklist for Major Development', which is cross-referenced to in paragraph 4.25. The SPG covers ecology in 2 sections 'Nature Conservation and Biodiversity', and 'Quality of Waterside Development', which cross-references to Riverbank Design Guidance to the Tidal Thames, and will, once updated refer to more recent sources of guidance such as 'Thames Strategy East (Thames Estuary Partnership March 2005), Terms of reference /source of information on ecological baselines etc are very wide, and the Council feels that the policy guidance in the Council SPG, along with more recent guidance in the London Plan, adequately reflects Environment Agency guidance.</p> <p>2. Noted. It will automatically be required that these opportunities are explored as part of the process described in i) above, subject to other considerations such as flood defence requirements.</p> <p>3. Accepted. It is proposed that paragraph 5.11, clause 6, be amended to include a reference to 'a field of water lilies, reedbeds or other native species, (subject to the requirements of London City Airport regarding bird hazard)'...</p>
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		<p>4. It should be noted that that PPS 9: Biodiversity and Geological Conservation has been recently published which provides the Government’s latest thinking on nature conservation issues. This states the following regarding the planning process: - decisions should be based up to date environmental information and where development will result in significant adverse impacts on biodiversity, planning permission should only be granted where adequate mitigation measures are put in place.</p> <p><u>Area 1: Armada</u></p> <ol style="list-style-type: none"> 1. The riverside walk should be set back from the river in order to allow for a vegetated undisturbed strip of vegetation adjacent to the river. 2. The landscape grid should be designed to ensure that green chains suitable for use by wildlife are created. <p><u>Area 3: Royal Albert Basin</u></p> <ol style="list-style-type: none"> 1. Request that any new structures on or over the intertidal foreshore must be designed so as to have a minimum impact on the area. 	<p>4. Noted. This approach is already followed by the Council in its assessment of planning applications, in accordance with London Plan policy. No change.</p> <p><u>Armada</u></p> <ol style="list-style-type: none"> 1. and 2. Accepted. It is proposed that the following clause is added in paragraph 5.3 after the clause referring to continuous public access etc: “The riverside walk should as a rule be set back from the river edge in order to allow for a vegetated undisturbed strip of vegetation adjacent to the river. The landscape grid should be designed and landscaped to provide suitable habitat for migratory birds and wildlife corridors for flora and fauna”. <p><u>Royal Albert Basin</u></p> <ol style="list-style-type: none"> 1. Accepted. It is proposed that a new clause is added at the end of paragraph 5.11 as follows: “Any new structures on or over the intertidal foreshore must be designed so as to have a minimum impact on the area. Piers, pontoons, jetties or similar structures should not bottom out onto the foreshore and must be designed so that they cause minimal shading of the foreshore. Structures should have an absolute minimum physical impact/footprint. Where new structures encroach into the river channel, it may be necessary for the hydraulic study to be conducted. A full ecological survey and appraisal of the foreshore and river walls should be undertaken for any new development adjoining the Thames prior to the submission
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		<p>2. The details of any new bridge across watercourse should be submitted to and agreed with the Agency.</p> <p>3. With regards to creating new wetland, the EA would need to be satisfied that the development would not impact upon the ecology of the dock.</p> <p><u>General</u></p> <p>1. Section 2.1 – request that a landscaped buffer zone of at least 16 metres between the built development and the river edge be incorporated into the development. Similarly that an 8 metre buffer zone is established between developments and the docks.</p> <p>2. Section 2.7 – support a strategic approach to extend reedbeds along the Thames. The Agency would always request that a strip of native planting is established immediately adjacent to the river. Therefore encourage that the Framework states that a green, native, buffer zone shall be established between any new development and the River Thames.</p>	<p>of applications for planning permission to ensure that the development does not negatively impact on the ecology of the Thames”.</p> <p>2. Accepted. It is proposed that a new clause is added after the proposed amendments outlined in 1) above, as follows: “Any new bridges across any watercourse, whether temporary or permanent, should be constructed so as to span both banks with the abutments set back from the watercourse on the bank tops and shall allow for a margin of bank underneath. This will maintain a continuous buffer strip and corridor which is available for wildlife passage and habitat and reduce the risk of pollution from run-off. Details should be submitted to and agreed with the Environment Agency”.</p> <p>3. Noted. The Environment Agency will automatically be consulted on such proposals as part of the Council’s statutory consultation procedures for planning applications.</p> <p><u>General</u></p> <p>1. Section 2.1 Partially accepted. It is proposed that the reference in paragraph 2.1 in the last sentence to ‘potentially reclaiming and creating new areas of both land and water’, be deleted. The design layout issues raised can more appropriately addressed at planning application stage, and are too detailed for inclusion in this Masterplan.</p> <p>2. Section 2.7 Accepted. It is proposed that a sentence be inserted after the first sentence as follows: “In general, the Council will require development along the River Thames to incorporate a green, native planting buffer zone fronting the River.</p>
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		<p>3. Section 3.3 – welcome the proposals to provide 3.5ha of ecologically enhanced waterbody feature. Suggest that this is re-phrased to river habitat or wetland habitat. Also suggest that a specific ecology section is included within the SPG.</p> <p>4. The multiple functionality of green/brown roofs is a factor which should be recognised and encouraged in the Framework.</p> <p>5. Section 3.7 – concerned with this statement. Any encroachment of land reclamation must be mitigated for to provide a total no net loss of habitat.</p> <p>6. Section 3.14 – welcome increased opportunities for recreation and access to the river. The incorporation of new riverside walks and ecological enhancements should be made together to ensure both features are co-</p>	<p>3. Section 3.3. Partially accepted. The 3.5 ha waterbody feature refers to a specific proposal in the Royal Docks. However, it is proposed that paragraph 4.25, subsection (i), be amended by insertion of the following after the second last sentence, ending in ‘permanent landtake: ‘ In addition, all development in the area should aim to incorporate ecological enhancement measures within their proposals, including the incorporation of wetland areas, terracing the flood defence walls, enhanced planting and the incorporation of green roofs into development. Green roofs can provide important habitats for wasteland flora, invertebrates and birds, and help improve the landscape character of the area. Green roofs can also be used effectively in many cases to provide a form of Sustainable Drainage, improve air quality, a form of building insulation, and overall help to conserve energy (see clause ii) and iii) below). This multiple functionality of green/brown roofs has a potential that should be recognised and encouraged”.</p> <p>4. Accepted. See 3) above.</p> <p>5. Section 3.7 Accepted. It is proposed that the last clause of the paragraph be amended by the addition of the following sentence at the end of the clause: “Any encroachment of land reclamation proposals should include appropriate ecological measures to mitigate loss of habitat or provide net ecological gain’.</p> <p>6. Accepted. It is proposed that the following sentence is added to the end of the paragraph 3.12 as follows: ‘Proposals for riverside walks and ecological enhancements will only be</p>
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		<p>ordinated.</p> <p>7. Lighting adjacent to the river should be sensitive and designed as to avoid overspill onto the foreshore area.</p> <p>8. Section 3.16 – Although the creation of a new wetland area is welcomed, a more native planting scheme would be appropriate.</p> <p>9. Open Space Section: It is important to elaborate this section further to include the intention to enhance biodiversity on a broader side through the SPG.</p> <p>10. Recreation: A range of general comments relating to recreation.</p> <p>11. Water Quality: A range of general comments relating to water quality.</p>	<p>considered by the Council in tandem to ensure that both features are co-ordinated and effectively integrated’.</p> <p>7. Accepted. It is proposed that the following sentence be added to the end of paragraph 3.14 as follows: ‘Lighting adjacent to the river should be sensitive and designed so as to avoid overspill onto the foreshore area, which would have a detrimental impact on roosting birds. The river channel with its wider corridor should be considered intrinsically dark areas and treated as recommended under the Institute of Lighting Engineers: Guidance Notes for the Reduction of Light Pollution’.</p> <p>8. Accepted. It is proposed that paragraph 3.16, second sentence be amended as follows: ‘Using the existing dock walls, this could reedbeds, water lilies and other appropriate native species of aquatic flora within a basin created by....’</p> <p>9. Accepted. It is proposed that the following sentence is added to the end of paragraph 4.12 as follows: ‘All proposals for open space provision should incorporate ecological enhancements measures, and aim for a net gain in biodiversity value, in accordance with paragraph 4.25 below.’</p> <p>10. Noted. The issues are already addressed in the London Plan and the Council’s Environmental Sustainability Checklist for Major Development SPG, which included a clear cross-reference to the need to address ‘Blue Ribbon Network’ policies. To include these issues here would result in unnecessary duplication, and involve unnecessary detail. No change</p> <p>11. Noted. Already covered by existing Council SPG. Too detailed a matter for inclusion in this SPG. No change is proposed.</p>
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		12. Water Conservation: A range of general comments relating to water conservation.	12. Noted. Already covered by existing Council SPG. Too detailed a matter for inclusion in this SPG. No change is proposed.
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