

Gypsy and Traveller Site(s) Local Plan

Regulation 18, Stage 2 Consultation Statement October 2017

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Executive Summary

Lewisham Council is preparing a planning policy document called the Gypsy and Traveller Site(s) Local Plan. It will identify a site to meet the local accommodation needs of the borough's travelling community.

This document is the consultation statement responding to the Regulation 18, Stage 2 consultation carried out between 17th October and 30th November 2016. During this stage of formal consultation, the Council sought feedback on two potential locations for a new site for gypsy and traveller pitches. The two sites were:

1. New Cross Social Club and adjoining Land (known as the New Cross Site)
2. Land at Pool Court (known as the Pool Court Site)

This document supports the preparation of the Local Plan and has been prepared in accordance with the Council's Statement of Community Involvement (SCI) and the Town and Country Planning (Local Planning) (England) regulations 2012 (as amended).

The consultation statement establishes the following, supported where appropriate by a number of appendices:

- Who we involved;
- How they were involved;
- A summary of main issues raised;
- Planning officer responses to issues raised (including how they will be addressed in the Local Plan);
- Further consultation work arising from the main issues raised during formal consultation; and
- Conclusion and next steps.

During the consultation, the Council used a number of techniques, namely:

- On-line and paper surveys;
- Letters of email;
- Drop-in information sessions;
- Focus groups;
- Traveller Forum; and
- Stakeholder Meetings.

A list of stakeholders that participated using these techniques and those which chose to organise petitions are identified in Table 1 below. Please note, some individuals may have participated in multiple activities.

Table 1: Engagement Activities and Participation Levels

Engagement Activity		Participation Levels
Written Representations	Surveys	177 surveys (submitted online and via paper)
	Letter or email	48 letters and emails
In person engagement	Information Session & Focus Groups	2 x Information sessions & Focus Groups were held.
		One session for Pool Court based stakeholders was held at the Resident's Lounge, 37 - 61 Pool Court, Catford and attended by 10 participants (excluding Council employees).
		The other session was held at Resident's Lounge, Lewis Silken House, 10 Lovelinch Close, Winslade Estate and attended by 19

Engagement Activity		Participation Levels
		participants (excluding Council employees).
	Traveller Forum Meeting	1 x Traveller Forum Meeting The Traveller Forum meeting was held at Wesley Halls, attended by 10 people and discussed the merits of both potential sites.
Petitions		3 x petitions were submitted with a total of 433 signatures. The 3 petitions were from: 1) Lovelinch Close. 315 signatures in opposition to New Cross site 2) Wheelshunters Club, 61 signatures in opposition to New Cross site. 3) Pool Court, 57 signatures in opposition to Pool Court site.

Written representations have been considered and deemed to fall into the following categories: support, objection, neutral, no comment. The following table details participant's position with regards to the suitability of the site(s). In person representations are not included in the below table as due to the number of participants it was not always possible to determine a singular position.

Table 2: Written representations position on the suitability of the two sites

New Cross		Pool Court	
Support	31	Support	34
Objection	116	Objection	95
Neutral	31	Neutral	43
No comment	47	No comment	53

The main issues that require further consideration in order to progress the selection of a suitable site to meet the housing needs of Gypsy and Travellers and the Local Plan include the following:

- Conformity with the approved Search Parameters - the potential Pool Court site is not in Council ownership or available 'now';
- The concentration of traveller sites in close proximity to the potential New Cross site – impact on services, 'ghettoisation' and cumulative effect upon the existing community;
- Ownership and deliverability of both potential sites – queries over the Council's ownership of the existing Multi Use Games Area (MUGA) at New Cross and the fact that Network Rail own a large part of the Pool Court site;
- Flooding risks at both potential sites – but particularly Pool Court, which is adjacent to the River Ravensbourne and has flooded in the past;
- Vehicular access at both potential sites – exacerbation of existing car parking problem and effect on emergency access to the Winslade Estate at the potential New Cross site and concerns about families living next to a road and emergency access at Pool Court;
- Loss of community facilities and housing at the potential New Cross site – loss of the MUGA that serves the Winslade Estate and loss of the Wheelshunters Social Club and residential flat without any replacement;
- Loss of an operational business and employment land at the potential Pool Court site – the existing scaffolding business would be displaced;
- Site size and capacity at Pool Court – concern about the shape and size of the potential site and ability to satisfactorily accommodate 6 pitches;
- Amenity concerns including noise at both potential sites and privacy and air quality at the potential New Cross site;
- The loss of ecology and habitat associated with the Site on Importance for Nature Conservation (SINC) at the Pool Court Site

- Deprivation and vulnerable communities – both sites are in deprived neighbourhoods with limited ability to accommodate travellers alongside existing vulnerable communities; and
- Impact on services in areas of deprivation (both sites) – additional demand on school places, doctor's surgeries and other services.

Consultation also raised a number of general issues not specifically related to site suitability or the proposed development guidelines. These include the following:

- Pitch allocation and management - concern that tenancy agreements and highway restrictions would not be enforced;
- Housing need and the needs assessment – preferential treatment being given to the traveller community (over the settled community) and inadequate consideration of the needs of travelling show people;
- Use of second site as a stopping place – one of the two sites should be used as a negotiated stopping place to assist the Council and the Police in sopping unauthorised encampments'.
- Insufficient Integrated Impact Assessment of the two potential sites; and
- Inadequate consultation.

The Council has undertaken further work on some of these issues to help decide the suitability of both of the potential sites, as well as the draft development guidelines.

1. Introduction

- 1.1 Travellers are part of our diverse community in Lewisham. Lewisham Council is responsible for assessing the housing needs of the travelling community, as we are for all our residents. The Housing and Planning Act (2016) places a duty on local authorities to consider the needs of “people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed.”
- 1.2 The Lewisham Gypsy and Traveller Accommodation Assessment (as updated in August 2016) into the housing needs of the Gypsy and Traveller community identified there are no current pitches in the borough and that there is a future need for at least six permanent pitches over the next 15 years, up to 2031. The breakdown of need over 15 years in Table 3 below. The study did not identify any need for transit pitches or Travelling Show people plots in the borough.

Table 3 – Additional Need for Travelling Households by 5-year periods

Year	0-5	6-10	11-15	
5 Year Periods	2016-2021	2021-26	2026-2031	Total
Lewisham – Travellers	3	2	1	6

- 1.3 We are currently preparing a single-issue Local Plan with the aim of allocating a single site to meet the local accommodation needs of Gypsy and Traveller communities within the borough.
- 1.4 The Gypsy and Traveller Site(s) Local Plan will form part of Lewisham’s development plan and will identify and designate land in the borough to accommodate the identified need for gypsy and travellers in accordance with National Planning Policy for Traveller Sites (August 2015).
- 1.5 Community and stakeholder engagement has included two stages of formal consultation. These two stages have provided an opportunity to inform the type and location of potential sites and criteria used to determine site suitability and to comment on two sites deemed to be potentially suitable using the finalised criteria. The two stages are:
- Stage 1 consultation: Scope of the local plan, site search parameters and site selection criteria; and
 - Stage 2 consultation: Potential sites and development guidelines.
- 1.6 Stage 1 consultation was undertaken between 3 March 2016 and 22 April 2016. The purpose of the engagement programme was to seek feedback on:
- the scope of the plan;
 - the proposed search parameters to be used to identify a site or sites;
 - the proposed selection criteria to assess alternative sites;
 - the proposed timetable for preparing the plan; and
 - an Integrated Impact Assessment (Scoping Report).
- 1.7 The Consultation Statement on this stage of the process was published in August 2016 and summarises the main issues raised in relation to the above, together with officer comments.

- 1.8** Stage 2 consultation was undertaken between Monday 17 October 2016 and Wednesday 30 November 2016. Consultation took place over a 6 week, 2-day period. Consultation was extended for a two-day period to take account of the press notice being published on Wednesday 19 October 2016.
- 1.9** The purpose of the engagement was to seek feedback on two potential locations for a potential traveler site and draft development guidelines that would help determine how a chosen site is developed. The potential sites are:
- New Cross Social Club and adjoining land, New Cross
 - Land next to Pool Court, Catford

2 Who we involved

- 2.1** The National Planning Policy Framework (NPPF) states that a wide section of the community should be engaged in the preparation of Local Plans, so that as far as possible, they reflect a set of agreed priorities for the sustainable development of the area (paragraph 155).
- 2.2** We, the Local Planning Authority, are required by legislation, Regulation 18(2) of the Town and County Planning (Local Planning) (England) Regulations 2012 to consult
- Specific consultation bodies such as national agencies and neighbouring planning authorities that they consider may have an interest in the subject of a proposed Local Plan.
 - General consultation bodies such as organisations that represent the interest of different ethnic groups, and
 - Such residents or persons conducting business within the area and from whom representations would be appropriate.
- 2.3** During Stage 1 consultation on the scope, search parameters and selection criteria, we invited the groups identified below to make representations. For Stage 2 consultation, we invited comments from these groups again, together with, as far as possible, those who had made representations during Stage 1.
- Existing residents and businesses within the borough
 - Representatives for and members of the Gypsy and Traveller and community within the Borough
 - Local service providers
 - Consultees listed on the planning policy database
- 2.4** A list of specific consultation bodies that were consulted with is provided in Appendix 1. A list of general consultation bodies that were consulted is provided in Appendix 2.

3 How we involved the community

3.1 The preparation of the Gypsy and Traveller consultation was undertaken in accordance with the Council's Statement of Community Involvement (2006). The SCI establishes the consultation methods used in the preparation of planning policy documents in order to fulfil statutory requirements.

3.2 Consultation was undertaken over a 6-week period between 17 October 2016 and 30 November 2016. Consultees were invited to participate via a number of mechanisms, both written and in person. See below:

- **Surveys** were available online or hard copy for completion. Targeted questions were used to gain feedback on the potential sites and draft development guidelines.
- Two **focus groups** were held with older members of the local community near the two potential sites, some of whom also had disabilities that would prevent them from attending a drop-in information session. The focus groups provided an opportunity to obtain in-depth information and answer questions from members of the community often considered 'hard to reach'. Pool Court managed by L&Q and Lewis Silken House, managed by Lewisham Homes respectively.
- **Drop-in Information Sessions** were held close to each potential site to allow community members to find out more about each potential site, ask questions and speak directly to council officers and inform officers of their views. A static display was prepared to present key information about the project and potential sites. These sessions enabled information to be shared as well as gathered by officers and stakeholders alike.
- Officers attended the **Lewisham Traveller Forum** to discuss the merits of the potential sites.
- **Letters and emails** were received from statutory bodies, organisations, the owner of part of the Pool Court site and organisations representing the interests of gypsies and travellers.

3.3 It was communicated to stakeholder that they had a number of methods to respond via a written representation or in person and the dates with which consultation responses were required. Details provided were as follows:

- **Online:** https://lewisham-consult.objective.co.uk/portal/planning_policy
- **Email:** planningpolicy@lewisham.gov.uk
- **Letter:** Planning Policy, London Borough of Lewisham, 3rd Floor, Laurence House, 1 Catford Road, SE64RU
- **In person/verbally:** comments were made at stakeholder meetings via note taking

3.4 A number of tools and techniques were used to ensure that interested parties were aware of the consultation and how to become involved. See below:

- **Introductory emails and letters** were sent at the commencement of the engagement process inviting government agencies, and interested organisations and bodies listed on the Council's planning policy database to participate in the engagement process.
- **Site notices** were placed on lamposts around the two potential sites at the commencement of the consultation, and inspected twice and replaced if necessary when council officers were in the area.
- A **public press notice** in the News Shopper, a weekly printed newspaper, was used to build awareness of the consultation and opportunities for involvement, particularly amongst those without access to email or a computer.
- An **e-newsletter article** was placed in the Lewisham E-newsletter. This was used to build awareness of the project and inform community members about the consultation.
- A **flyer** was prepared to build awareness of the consultation and opportunities for involvement. The flyer was available at borough libraries, at the two drop-in

information sessions, the Council's Planning Information Office and Phoenix Community Housing's main office.

- **Social media** including blogs, posts and tweets as means to aid dissemination of information via online methods.

3.5 Relevant and accessible information was provided to inform stakeholder understanding and aid accessibility to the issues.

- **A Potential Sites Consultation Report** was prepared to identify the two potential sites for allocation as a gypsy and traveler site and associated development guidelines. This report also established how to provide feedback on the consultation.
- A **project webpage** at www.lewisham.gov.uk/travellingcommunity was prepared to communicate key information about the project, including the steps needed to find and establish a site, the potential sites consultation and information about gypsy and traveller culture and answers to other 'frequently asked questions'. It also contained copies of consultation documents, supporting material and a link to the online survey and the local plan page in the planning policy section of the Lewisham website.
- Information sheets were developed to provide key information for people without access to email or a computer. These contained the information available on the project webpage.
- Information repositories were used to make consultation documents available to view and use at all borough libraries and at the Council's main office at Laurence House, Catford for the duration of the consultation. During the consultation, the flyers, information sheets and questionnaires were also placed in the Winslade Estate's local convenience store and children's nursery, on request.
- Two drop-in information sessions (as previously described under the consultation section) were held close to each potential site to allow community members to find out more about each potential site, ask questions and speak directly to council officers and inform officers of their views. A static display was prepared to present key information about the project and potential sites.

4 Feedback Levels and Summary of the Main Issues

- 4.1 Regulation 18, Stage 2 consultation sought representations on the suitability of two potential sites and associated development guidelines.
- 4.2 The following section, and supporting appendices, have been prepared to meet the requirements of the SCI and relevant legislation, Regulation 22 of the Town and County Planning (Local Planning) (England) Regulations 2012 which details how reporting back on consultation must be conducted.
- 4.3 This section provides a quantitative assessment of feedback and identifies the main issues raised by stakeholders during Regulation 18, Stage 2 of the Gypsy and Travellers Local Plan and identifies the Council' response to the issues presented.
- 4.4 The supporting 12 appendices confirm who was invited to comment (and who actually commented) and set out the comments together with a short officer response. The summaries use the site based and thematic structure provided by the main issues to organise comments.
- 4.5 The quantitative assessment identifies levels of participation via the different engagement activities. It also identifies the position of written representors regarding suitability of the two sites and the frequency with which the main issues were raised.
- 4.6 Table 4 below, identifies that a number of engagement activities were used and it should be noted that some individuals may have participated in multiple activities.). This was to aid greater levels of participation. Table 4 also identifies the level of participation with each activity.

Table 4: Engagement Activities and Participation Levels

Engagement Activity		Participation Levels
Written Representations	Surveys	177 surveys (submitted online and via paper)
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In person engagement	Information Session & Focus Groups	2 x Information Session & Focus Groups were held. One session for Pool Court based stakeholders was held at the Resident's Lounge, 37 - 61 Pool Court, Catford and attended by 10 participants (excluding Council employees). The other session was held at Resident's Lounge, Lewis Silken House, 10 Lovelinch Close, Winslade Estate and attended by 19 participants (excluding Council employees).
	Traveller Forum Meeting	1 x Traveller Forum Meeting The Traveller Forum meeting was held at Wesley Halls, attended by 10 people and discussed the merits of both potential sites.
Petitions		3 x petitions were submitted with a total of 433 signatures. The 3 petitions were from: 1) Lovelinch Close. 315 signatures in opposition to New Cross site 2) Wheelshunters Club, 61 signatures in opposition to New Cross site. 3) Pool Court, 57 signatures in opposition to Pool Court site.

- 4.7 Written representations have been considered and deemed to fall into the following categories with regards to the question of site suitability for the New Cross site and Pool Court Site: support, objection, neutral, no comment. The following table details participant's position with regards to the suitability of the two sites. In person representations are not included in the below table as due to the number of participants it was not always possible to determine a singular position.

Table 5: Written representations position on the suitability of the two sites

New Cross		Pool Court	
Support	31	Support	34
Objection	116	Objection	95
Neutral	31	Neutral	43
No comment	47	No comment	53

- 4.8 The summary of main issues has been organised in the following format:
- Table 6: Summary of main issues relating to New Cross site (site suitability and development guidelines)
 - Table 7: Summary of main issues relating to Pool Court (site suitability and development guidelines)
 - Table 8: Summary of main issues related to both sites
 - Table 9: Summary of other main issues (including Integrated Impact Assessment) not specifically related to site suitability or development guidelines

Table 6: Summary of main issues related to New Cross site		
Key Issues	Summary of issue	Officer Response
Concentration of Traveller Sites	<p>There are four gypsy and traveller sites in Southwark within 1500m of the potential New Cross Site.</p> <p>Some members of the Lewisham traveller community have expressed grave concerns about the risk of intimidation and harassment from the Southwark traveller community (Traveller Forum 11-10-16)</p>	<p>The issue was raised by a number of individuals during consultation on the draft Search Parameters and Site Selection Criteria. However, in July 2016, the Mayor and Cabinet accepted officer's response that given the size of the borough and the difficulties involved in locating a site for Gypsy and Traveller use, an 'exclusion zone' was not appropriate. Such a restriction would be excessively restrictive in terms of site identification and the justification in terms of the impact on local services and resources is unsubstantiated (see Table 8 below).</p> <p>The Metropolitan Police recognise these concerns and is more supportive of the Pool Court site. Officers too accept that these fears are genuine. However, a site would not be provided for individuals but for the Lewisham traveler community. Suitable pitch allocation and management arrangements would enable those people with a Lewisham connection who wanted to live on a site to apply and pitches would be allocated based on housing need.</p>

Table 6: Summary of main issues related to New Cross site		
Key Issues	Summary of issue	Officer Response
Ownership and Deliverability	Individuals at the New Cross drop-in session queried the Council's ownership of the existing Multi Use Games Area (MUGA).	The freehold of the site is owned by the Council. The New Cross Social Working Men's Club initially had a 60-year lease of the whole site (up to January 2034). The land now occupied by the MUGA was surrendered to the Council in 2006, to allow for the MUGA to be built in consideration of the rent under the lease being reduced. In 2010, the Council granted a one year to the Wheelshunters Club to stay in the Social Club building. However, the initial 60-year lease was not terminated and remains in place. The Council will need to regularise the lease situation by taking appropriate steps to terminate this lease. The Wheelshunters Club also remains in occupation of the Social Club building and this occupational arrangement would need to be terminated
Flood Risk	The Environment Agency (EA) does not rule out this site, but it does raise some concerns. The site is in Flood Zone 3 (High Risk) but benefits from Thames Tidal Defences. Technically the site is considered to be at risk from 'upstream inundation' of the Thames area in the scenario that lateral flood defenses were removed and the Thames Barrier was closed.	<p>The flood risk scenario is unlikely and in any event flood waters would take 6-12 hours to reach the site. Officers have met with the EA and the EA officers at the meeting considered that there was the reasonable prospect of a traveller site being acceptable from a fluvial flooding point of view, providing that a robust detailed case was made and that adequate mitigation was incorporated. The potential mitigation discussed was as follows:</p> <ul style="list-style-type: none"> • Flood warnings (including possibly an on-site siren). • Possible tethering of caravans to the site – to prevent them from being washed away/causing debris hazard. • Raising of land to deal with any local surface water/critical drainage issues. <p>The above potential mitigation measures could be referred to in the site-specific guidance if the New Cross site was chosen.</p>

Table 6: Summary of main issues related to New Cross site		
Key Issues	Summary of issue	Officer Response
Car Parking & Vehicular Access	Car parking on the Winslade Estate is currently a major concern of residents and some concerns have been expressed that a site here could exacerbate the problem and/or impede emergency access to the Estate.	<p>The Highway and Access Feasibility Report (October 2016) tested vehicular access and turning space requirements for an occasional delivery of a large mobile home to a site (18.5m vehicles, which are longer than a fire engine). The study found that this was achievable, but noted that parking restrictions would need to be introduced opposite an entrance (likely to displace 6 kerb-side spaces) and that large vehicles would need to be guided in and out of a site.</p> <p>The above would result in some loss of kerb-side parking opportunities, as referred to above, but this would be partly off-set by closing the existing vehicular access to the Social Club car parking – so the net loss is likely to be in the order of 4 to 6 spaces.</p> <p>Lewisham Homes has introduced a gate to the southern end of Lovelinch Close and Sharrat Street as part of wider traffic management arrangements for the Estate designed to tackle anti-social behaviour. Vehicular access is now restricted to Rollins Street. Officers do not consider that the establishment of a traveller site on Hornshay Street would impact on these arrangements.</p> <p>Officers have met with the London Fire Brigade to discuss issues and they have raised no particular concerns about this potential site.</p>
Loss of MUGA	The New Cross Gate Trust, New Cross Learning, the REM Educational Centre, Queens Road GP Surgery, Somerville Youth and Play Provision, the Lewisham Outreach Service for Gypsy and Roma Travellers and a number of individuals have objected to the loss of the existing MUGA. The GLA has called for the MUGA to be re-provided.	The existing MUGA was funded by the former New Cross Gate NDC and Marathon Trust and provided in 2006/07 following lobbying from local people. It comprises 3 separate games court areas (two kick-about areas and an informal basketball practice area) of approx. 720sqm, together with adjacent team areas, including two seats/shelters. The nearest other MUGAs are Brimington Park in Southwark on the south side of Old Kent Road

Table 6: Summary of main issues related to New Cross site		
Key Issues	Summary of issue	Officer Response
		<p>(approx. 500m away).</p> <p>The Potential Sites Report made clear that mitigation for the loss of the existing MUGA would be required by way of improvements to an existing facility or a replacement facility. Officers have commissioned a feasibility study in to providing replacement facilities on a garage and hardstanding area adjacent to Upnall House, directly opposite the potential site on the north side of Hornshay Street. The study finds that this space could provide 1 multi-use games area and a team area of approx.407sqm or a multi-use games area and separate informal basketball practice area of approx.323sqm. Whilst these options would mean that there would be a significant net loss of games space, it would enable replacement smaller facilities to be provided in the immediate area. Officers consider that facilitating the provision of a traveller site could represent special circumstances that justify such a loss.</p> <p>Officers have also commissioned a masterplan capacity study for this potential site. This suggests that it would be possible to provide 6 pitches whilst retaining the existing small kick-about area and informal basketball practice area. If this approach was taken and a replacement larger kick-about area provided on land at Upnall House, then there would be no loss of facilities and a small net gain in space (approx. 760sqm as opposed to the existing 720sqm). The masterplan capacity study also identifies an option of providing 6 pitches with individual vehicular accesses and replacement multi-use games area on the site of the existing Social Club car park that could possibly retain all facilities and avoid any net loss in space.</p> <p>Whilst there has been some discussion with Lewisham Homes</p>

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Key Issues	Summary of issue	Officer Response
		about the Upnall House option, there has been no consultation with local residents or users of the existing games courts about this or the masterplan capacity study. This would take place if this potential site was chosen to go forward.
Loss of Social Club and residential flat	The Wheelshunters Club, the Lewisham Outreach Service for Gypsy and Roma Travellers and a number of individuals have objected to the loss of the Social Club and/or residential accommodation. The GLA has called for the social club to be re-provided.	<p>The Social Club is a licensed bar and hall providing live entertainment and is open to hire for events (weddings etc.). It is also used by a local church for meetings. The building includes a residential flat. The loss of the Social Club and housing without mitigation would be against policy. However, this needs to be balanced against Core Strategy Policy 2 which makes clear that the Council will assess and provide for the identified needs of the gypsy and traveller community. Officers consider that facilitating the provision of a traveller site (which would result in a net gain of residential accommodation) could represent special circumstances that justify the loss of the Social Club and existing residential flat.</p> <p>During a stakeholder meeting, the current tenants (the Wheelshunters Club) asked whether there would be an opportunity for them to get involved in the redevelopment of Scotney Hall on Sharratt Street. The Hall re-opened at the end of April 2017 following refurbishment. It may be able to accommodate some of the functions currently offered by the Social Club (e.g. weddings), but officers do not consider that this would be a suitable location for a licensed private members club. The Council could provide the Wheelshunters Club with the maximum notice possible to vacate the premises and assist it suitable alternative accommodation in the area.</p>
Privacy	The New Cross Trust and a local resident have raised concerns about privacy.	The potential site is between approx. 13 and 18m to the south of Saltwood House (a four-storey block of flats that looks directly on to the site) and

Table 6: Summary of main issues related to New Cross site		
Key Issues	Summary of issue	Officer Response
		<p>approx. 22m to the south of Upnall House (a four-storey block of flats that presents a blank flank wall to the site).</p> <p>There are many streets in London where homes face each other across a street that is 13m wide. In this case, pitches would contain single-storey caravans/small buildings and homes in Saltwood house would look down on them. The site-specific guidance included in the Potential Sites Consultation Report calls for a boundary treatment that protects the privacy of residents living on the site and tree planting to improve the street scene. With these things in place, the privacy of existing residents of Saltwood House and future residents of a site should be safeguarded.</p>
Noise & Air Quality	The New Cross Trust and a local resident have raised concerns about the suitability of the site in terms of noise and air quality.	The Council's Environmental Protection Team has highlighted the need to consider noise from the elevated railway lines that form the southern and western boundaries of the site, but raised no objection in principle to residential use of the site. Caravans are generally not well insulated against noise and the layout, orientation and design of pitches and associated structures would need to take account of this. The site is within Air Quality Management Area 1, but is away from main roads and occupiers would be unlikely to have high exposure to poor air quality.

Table 7: Summary of main issues related to Pool Court site		
Key Issues	Summary of issue	Officer Response
Compliance with Search Parameters	Bellingham councillors have raised the concern that the approved Parameters include that that the proposed land for the site be Council-owned and available now.	The Mayor and Cabinet report (January 2016) and Potential Sites Report make clear that private land adjoining Council owned land may be considered suitable if it were considered necessary to develop a Council asset. The National Planning

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Key Issues	Summary of issue	Officer Response
		<p>Policy for Traveller Sites' notes that to be considered deliverable sites should be available 'now', offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within five years.</p> <p>This definition was adopted as Site Selection Criteria 10. Part of the Pool Court site is currently owned by Network Rail, with the possible small addition of current public highway owned by London & Quadrant. Whilst not all the potential site is available 'now', although officers consider that the site is deliverable in that it could be provided within 5 years. In addition, it may be possible to develop the site in phases (with at least 3 pitches on the Council-owned land delivered up to 2021 and at least three further pitches being developed on land currently owned by Network Rail between 2021 and 2031. This option would need to be investigated further.</p>
Ownership and Deliverability	<p>LBL owns the land to the north of Pool Court itself. Network Rail (NR) owns a sliver of land between this land and the River and the adjoining scaffolding site. London & Quadrant Housing Association owns Pool Court highway land.</p>	<p>The Council owns the western part of the potential site, but not a sliver of land between the site and the Ravensbourne River. Network Rail owns this sliver of land and also the eastern part of the potential site, which is partly occupied by a scaffolding yard which has a lease expiring in 2020. Officers have held discussions with Network Rail over the possibility of purchasing its interest in this land. Network Rail is currently undertaking a portfolio sale of its commercial estate. However, in August 2017, in response to a letter from the Mayor, Network Rail confirmed that owing to the requirement to produce a definitive portfolio of assets for the marketing and potential disposal of its commercial estate, it is no longer able to consider offers for the sale of the eastern part of the potential site. On this basis, the Council would need to discuss purchase with the new owner of the land. Officers understand that Network Rail is</p>

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Key Issues	Summary of issue	Officer Response
		<p>hoping to dispose of its commercial estate in June 2018.</p> <p>Officers understand that the portfolio disposal is scheduled to be complete by June 2018. Given this, officers consider that there is the reasonable prospect that the Council could purchase the scaffolding yard from a new owner (either by agreement or compulsorily), secure planning permission and begin to deliver a traveller site by the end of 2021. In addition, it may be possible to develop the site in phases – as discussed above.</p> <p>Officers have also investigated the possibility of further rationalising the potential site so include part of the existing hammer head vehicular-turning area at the northern end of Pool Court. This is not essential for servicing existing housing and is often the subject of fly-tipping. The inclusion of all or some of this area within the potential site would improve its deliverability by marginally increasing its size, but more importantly by and improving its shape. This would require the closure of an area of public highway and the acquisition of the stopped-up highway land from London & Quadrant Housing Association.</p>
Flood Risk	Ward councilors, some individuals, the Environment Agency and Phoenix Community Housing Association have raised concerns about flood risk.	<p>The north-western part of site has flooded in the past (1965) and the Environment Agency (EA) has raised some significant concerns. Since the EA submitted its written concerns, it has released results of recent modelling of the Ravensbourne River for a 1:100-year flood event including 25 and 35% allowances for climate change. Consultants have mapped the likely extent of flooding on the site and officers and consultants have met with the EA.</p> <p>The modelling shows flood water running back from the River along the adjoining railway corridor and extending on to the western part of the potential site by about 5m. EA</p>

Table 7: Summary of main issues related to Pool Court site		
Key Issues	Summary of issue	Officer Response
		<p>officers at the meeting considered that there was the reasonable prospect of a traveller site being acceptable from a fluvial flooding point of view, providing that a robust detailed case was made and that adequate mitigation was incorporated. The potential mitigation discussed was as follows:</p> <ul style="list-style-type: none"> • Setting back development 8m from the existing river channel, investigating naturalising the southern bank (i.e. removing the concrete wall) and follow guidance in the Council's River Corridor Supplementary Planning Document. • Avoiding locating caravans, car parking and hard-standing areas which could be used for storage purposes in the high flood risk western part of the site • Incorporating SUDS (e.g. green roofs on permanent buildings) where possible - including devices to control rates of discharge in to the River to green field run off rates – when not in flood and consider providing attenuation ponds to provide surface water storage and amenity value • Incorporating like-for-like level compensation works if ground levels need raising in some areas. • Safe and dry route to safety. • Flood Evacuation Plan. <p>Site-specific guidance contained in the Potential Site Consultation Report already refers to the need to set development back 8m from the River and take account of the River Corridor Improvement Plan. Officers recommend that if this site is chosen the guidance is revised to provide additional guidance on potential mitigation and flood resilient design.</p>
Vehicular Access	The Lewisham Outreach Service for Gypsy and Roma Travellers has raised concerns that families would	The Highway and Access Feasibility Report (October 2016) tested vehicular access and 'swept path analysis' (vehicle turning space

Table 7: Summary of main issues related to Pool Court site		
Key Issues	Summary of issue	Officer Response
	live next to a site road and Phoenix Community Housing Association and some individuals have raised concerns about emergency access.	<p>requirements) for an 18.5m lorry (which is bigger than a fire engine) for three scenarios: (1) In and out via scaffolding yard, (2) In and out via Pool Court and (3) In from Scaffolding yard and out from Pool Court.</p> <p>All scenarios allow for a lorry to enter and leave in forward gear but take up different amounts of the site. The Potential Sites Consultation Report incorporates Scenario 1, on the basis that an in and out single access from Fordmill Road is preferable to traveller site traffic using Pool Court to exit a site. Officers consider that likely levels of traffic mean that family-sized pitches would be acceptable. Such an approach should not be unduly disruptive for the proposed traveler community and should not cause inconvenience for users of Fordmill Road or existing local residents</p> <p>Officers have met with the London Fire Brigade to discuss issues of safety and emergency access and the need for an emergency pedestrian exit from the potential Pool Court site. At this stage, the Fire Brigade considered that that there would be no need for a secondary vehicular access a pedestrian-only exit on to Pool Court was desirable, but not essential. Officers would continue to liaise with the Fire Brigade if this site went forward to ensure that detailed design met the all relevant guidance and best practice.</p>
Loss of operational business and employment land	The existing scaffolding business (RHS Site Services) and a number of individuals have objected to the loss of the existing scaffolding yard/employment land.	Core Strategy Policy 5 and DM Policy 11 seek to protect the scattering of employment locations throughout the borough outside of designated employment locations. However, officers consider that facilitating the provision of a traveller site could represent special circumstances that justify this loss. If this site went forward, officers would consider what re-location assistance the Council would be able to offer.

Table 7: Summary of main issues related to Pool Court site		
Key Issues	Summary of issue	Officer Response
Loss of ecology and habitat	Natural England, Phoenix Community Housing Association and some individuals object to the loss of green space/ adverse impact on nature conservation.	<p>Currently the whole site is within the Pool Court Linear Park Site of Importance for Nature Conservation (SINC) (Borough Importance), although the Re-Survey of SINCs 2016 proposes to exclude the scaffolding yard from the designation. Planning Policy CS 12 & Site Allocations Local Plan seek to protect SINCs.</p> <p>Officers anticipate that the ecological value of the potential site would be relatively limited due to the dominance of Japanese knotweed across the Council owned land. Overall, officers consider that a carefully designed scheme that eradicates Japanese knotweed, appreciates the river, retains/mitigates the loss of existing valuable trees and any protected species issues would be acceptable.</p> <p>Site-specific development guidance contained in the Potential Site Consultation Report already calls for careful treatment next to the River, retention of trees where possible and careful lighting. This could be strengthened if this potential site went forward.</p>
Site size and capacity	Phoenix Community Housing Association has raised concerns about the shape and size of the site and lack of access to open space. A number of individuals share concerns about shape and size.	Following clarification on ownership and minor adjustments, the overall potential site measures approx. 3,150sqm. Officers have commissioned a masterplan capacity study for this potential site. This demonstrates that the site could satisfactorily accommodate at least 6 pitches in accordance with the draft development guidelines in the Potential Sites Report (including a single in-out vehicular access from Fordmill Road and pitches set back 8m from the River) and also taking account of subsequent advice from the Environment Agency to pull caravans away from the western boundary. The study also looked at two other options – including an option with vehicular access in from Fordmill Road and out via Pool Court

Table 7: Summary of main issues related to Pool Court site		
Key Issues	Summary of issue	Officer Response
		<p>and an option with vehicular access just from Pool Court.</p> <p>If this site is chosen, it may be possible and desirable to include all or part of the existing hammer-head turning area at the northern end of Pool Court in to the potential site It should be noted that this would require re-consultation, the associated closure of area of public highway and the acquisition of the stopped-up highway land from London & Quadrant Housing Association.</p> <p>A traveller site here could be developed to provide areas of open space and shared use, including the naturalization of the southern bank of the Ravensbourne River.</p>
Amenity	Phoenix Community Housing Association has raised the concern that the site is not suitable due to noise from adjoining railway lines, particularly freight trains using the ground level tracks immediately to the west of the site.	The Council's Environmental Protection Team has highlighted the need to consider noise from neighbouring railway lines, but raised no objection in principle to residential use of the site. Caravans are generally not well insulated against noise and the layout, orientation and design of pitches and associated structures would need to take account of this. If this site was chosen, it is recommended that the site-specific guidance is amended to reflect this and to refer to the need for a solid fence of appropriate mass/sound reduction qualities to be installed along the western boundary.

Table 8: Summary of main issues related to both sites		
Key Issues	Summary of issue	Officer Response
Deprivation & vulnerable communities	A number of consultees have raised concerns that the two potential sites are in deprived neighbourhoods and the ability of these neighbourhoods to accommodate travellers alongside existing vulnerable communities	New Cross is the second most deprived Ward in Lewisham and Bellingham (which includes the potential Pool Court site) is the third most deprived Ward. Both potential sites are within the 20% most deprived neighbourhoods (Lower Layer Super Output Areas) in the country.

Table 8: Summary of main issues related to both sites		
Key Issues	Summary of issue	Officer Response
		<p>Introducing a traveller site in either potential location would pose challenges to creating and maintaining a mixed and balanced community in the wider neighbourhood which they would sit within. If either of these sites is chosen, the Council and its partners would need to strengthen its efforts to increase the capacity and resilience of local communities. In addition, officers recommend that the Outreach Worker facilitates meetings between local residents and members of the Lewisham traveller community to build understanding and community cohesion during the detailed design and planning stages and beyond.</p>
Impact on services and facilities	The arrival of new persons and families at the site places an additional demand on school places, doctor's surgeries and other services.	<p>The traveller community does have particular needs around education and health and faces particular challenges in accessing health, education and other services. Officers have engaged with the Council's School Places Manager and NHS Lewisham Clinical Commissioning Group (CCG) at all stages of the process. The CCG has responded to the latest consultation stating that it considers that the impact on health services would be minimal for either site.</p> <p>Officers do not envisage that the population generated by the provision of the site (circa 20-25 people) would add undue pressure on local infrastructure or services – including in combination with existing traveller sites in Southwark in relation to the potential New Cross site. However, it is recommended that liaison takes place with local schools and GP surgeries once a preferred site is known to enable them to make any adjustments to service provision that may be necessary in advance of a site being first occupied.</p>

Table 9: Summary of other main issues

Other main issues	Summary of issues	Officer Response
Pitch allocation and management	<ul style="list-style-type: none"> • There is a concern that tenancy agreements and road restrictions wouldn't be enforced. • Further concern around waste management, noise, unsupervised children, overcrowding of the site. 	<p>Officers have started to prepare a Pitch Allocation Scheme to establish a fair, transparent and equitable system for the allocation of pitches, with eligibility being based on the ability to demonstrate a 'local connection' with Lewisham. The intention is to consult on a draft Scheme once a preferred site has been identified.</p> <p>The Potential Sites Consultation Report requires the submission of a Site Management Plan to accompany a planning application. An approved Plan for a site will be an important tool to ensuring a well-run site and managing potential anti-social behaviour (such as burning off material).</p>
Housing need and the needs assessment	<p>Is the Council giving preferential treatment to members of the travelling community compared to others residents and are travellers get to choose where they live?</p> <p>The LB Bromley considers that the needs of those on its waiting list, provides a realistic understanding of families who have an evidenced desire to locate on Bromley pitches. And notes that once Lewisham opens a site/s, a waiting list may attract applications from these families in brick and mortar with links to Lewisham.</p> <p>The LB Bromley notes that the identified zero requirement for Travelling Show people is determined on the basis that there are currently no yards in Lewisham and the view of a representative of the Showman's Guild of Great Britain that they would be looking at existing yards and surrounding land. It considers this to be a circular argument with the</p>	<p>The Housing and Planning Act (2016) places a specific duty on the Council to consider the needs of travellers. It does this alongside assessing the housing needs of the majority settled community. Officers have engaged with individual travellers through the Lewisham Traveller Forum and with organisations that represent the traveler community.</p> <p>Notwithstanding the above, comments made from all individuals and organisations have equal weight. Officers consider that the assessment that there is a lack of need for plots for travelling show people is reasonable and will continue to address wider sub-regional traveller and show people needs, including the need for a transit site, through Duty to Co Operate discussions with neighbouring boroughs.</p>

Table 9: Summary of other main issues		
Other main issues	Summary of issues	Officer Response
	lack of an allocation (making new yards onerous) being used to justify the zero allocation.	
Use of second site as a stopping place.	<p>The Lewisham Outreach Service for Gypsy and Roma Travellers and the London Gypsy and Traveller Unit have raised the prospect of one of the potential sites being developed as a permanent residential site and the other being developed as a negotiated stopping place - to assist the Council and the Police to direct Travellers who stop on unauthorised encampments.</p> <p>The LB Bromley has notes that policy 12 in its Submission Draft Local Plan (2016) indicates that, with regard to transit pitches, “the Council will work with the sub region to secure their provision in an appropriate location within the sub region”. Such work will be undertaken mindful of the numbers of incursions experienced by boroughs and the sub regional provision for Travelling Show people that Bromley already provides.</p>	<p>The Gypsy and Traveller Accommodation Assessment Update (August 2016) notes that there is the possibility that changes to the definition of ‘gypsy and traveller’ could result in increased levels of travelling but it is not recommended that there is a need for the Council to consider any transit provision at this time.</p> <p>The Council and the Metropolitan police have developed a joint policy and protocol for unauthorised encampments and officers do not consider that there is the need for a transit site or a negotiated stopping place.</p>
Integrated Impact Assessment (IIA) (August 2016)	<p>New Cross Gate Trust, Shontelle Williams, Historic England, the London Gypsy & Traveller Unit and the Outreach Services for Gypsy Roma Travellers make a number of comments, as follows</p> <ul style="list-style-type: none"> • The IIA is completely insufficient and comes across as a ‘tick box’ exercise. Challenge specific assertions (New Cross Gate Trust) • There are designated 	The latest IIA (October 2017) takes account of these comments.

Table 9: Summary of other main issues		
Other main issues	Summary of issues	Officer Response
	<p>heritage assets (Conservation Areas) in close proximity to both of the sites and these should be considered as part of the IIA process. It is advised that the Council's heritage specialist is actively engaged in the preparation of the Gypsy and Traveller Local Plan (Historic England)</p> <ul style="list-style-type: none"> • There is a missed opportunity under the IIA objective "to mitigate and adapt to the impact of climate change". Connected green space and green infrastructure help species adapt and relocate in response to climate change (Natural England). • Consideration of the proposed New Cross site and Lovelinch Close should be treated as one site as the MUGA aims to principally serve Lovelinch Close and the social, environmental and access issues effecting Lovelinch Close also affect the proposed site (Shontelle Williams). • Should acknowledge the positive impacts the proposed site allocations would have in addressing some of the inequalities facing the Gypsy and Traveller community, particularly in terms of health (LGTU and Outreach Services for Gypsy Roma Travellers). • Agree that the New Cross Social Club site will "increase, maintain and enhance open space, biodiversity, flora and fauna" by..." The 	

Table 9: Summary of other main issues		
Other main issues	Summary of issues	Officer Response
	proposed tree planting along the boundary with Hornshay Street". (Natural England)	

5 Further investigations

5.1 The consultation has highlighted that in order to determine site suitability, further work must be undertaken at both sites. Further assessment of the following matters has taken place:

- Clarifying ownership issues in relation to the New Cross site and considering ways to regularise lease arrangements in relation to the Social Club;
- Commissioning a study in to a possible re-provision of smaller MUGA facility on land at Upnall House opposite the potential New Cross site (MUGA Re-provision Study) and holding discussions with Lewisham Homes;
- Holding discussions with Network Rail over acquiring the scaffolding site at Pool Court and raising with London and Quadrant Housing Association the possibility of acquiring a small area of existing public highway land at Pool Court;
- Seeking officer advice in relation to ecological impact at Pool Court.
- Commissioning further advice on flood risk issues and holding discussions with the Environment Agency in relation to both potential sites;
- Holding discussions with the London Fire Brigade in relation to both potential sites; and
- Commissioning a Masterplan Capacity Study for both potential sites to explore how they might be developed – both in accordance with the draft Site-specific Development Guidelines included in the Potential Sites Consultation Report and otherwise.

5.2 The further assessment work has involved further engagement with stakeholders, including:

- Lewisham Homes;
- Network Rail;
- London & Quadrant Housing Association;
- London Fire Brigade; and
- Environment Agency.

6 Conclusion and Next Steps

Conclusion

- 6.1 Consultation on the Regulation 18, Stage 2 Consultation was carried out in accordance with the Council's Statement of Community Involvement (SCI) (2006) between 17 October and 30 November 2016. Further work, including stakeholder engagement was carried out following this period.
- 6.2 All representations (letters, emails, survey response, petitions, drop in sessions and focus group meetings) have been recorded. This consultation statement serves as a record of how consultation was conducted, with whom it was conducted, what the main issues were and how these issues are influencing the development of the Gypsy and Traveller Site(s) Local Plan as well as the Integrated Impact Assessment.
- 6.3 There was a large response to this consultation and the comments were received from high interest stakeholders including Lewisham's travelling community and organisations representing their interests, landowners, business and residents directly adjacent to or on the two sites, service providers, statutory bodies and users of community facilities. The volume and diverse number of stakeholders involved in the consultation provides an informed assessment of the suitability of the two proposed sites and proposed development guidelines.

Next Steps

- 6.3 Representations received during the consultations (Stage 1 and Stage 2), together with directions set out in government policy and evidence from further investigations are being used to inform discussions and:
- 1) determine the suitability of the potential sites;
 - 2) identify one site as preferential for allocation as a residential traveler site
 - 3) inform changes to the relevant development guidelines and;
 - 4) prepare the Draft Local Plan for publication and submission to the Secretary of State for examination
- 6.4 Further consultation (Regulation 18, Stage 3) may be necessary before the Council decides whether one of the potential sites is suitable and should be allocated for a residential traveller site.
- 6.5 Once a site has been identified as the preferred site for allocation for a residential traveler site and associated development guidelines have been revised, we will then publish the proposed 'submission' version of the Plan, also known as the Regulation 19 document, and make it available for comments on the 'soundness' of the plan prior to its submission to the government.

Appendix 1 – Specific Consultees

The Town and County Planning (Local Planning) (England) Regulations 2012 (as amended) defines the following organisations as ‘specific consultation bodies’. The following bodies were consulted as part of the Regulation 18, Stage 2 Local Plan consultation.

- London Fire Brigade
- Lewisham Clinical Commissioning Group
- Metropolitan Police
- Deputy Director Public Health
- Lewisham Council Lead Local Flood Agency
- Lewisham Council Environment Agency Team
- Lewisham Council Education Team
- Virgin Media
- EE
- Vodafone
- Telefonica
- Three
- British Telecommunications
- Marine Management Organisation
- Natural England
- Office of Rail and Road
- Mayor's Office for Policing and Crime
- SELCHP
- Transport for London (TFL)
- Greater London Authority (GLA)
- Environment Agency
- London Borough of Bromley
- London Borough of Croydon
- London Borough of Lambeth
- London Borough of Southwark
- Royal Borough of Greenwich
- London Borough of Tower Hamlets
- London Borough of Bexley
- London Enterprise Panel
- Historic England
- UK Power Networks
- City Fibre
- Arquiva
- National Grid
- Hyperoptic
- Southern Gas Networks
- Thames Water
- Network Rail

Appendix 2 – General and Other Consultees

The Government has defined General Consultation Bodies as voluntary bodies some or all of whose activities benefit any part of the authority's area and other bodies who represent, in the authority's area, the interests of different racial, ethnic or national groups, different religious groups, disabled persons, and business interests.

The Lewisham Planning Policy database contains over 1500, groups, organisations and companies including following categories. Consultation notices were sent to these bodies alongside individuals who have signed up to the database.

- Advice and information groups
- Amenity groups
- Architects, planners and other professionals
- Black and Minority Ethnic Groups
- Builders
- Community groups
- Conservation and heritage groups
- Developers
- Disability groups
- Education/children/young people's groups
- Elderly groups
- Employment/business interests
- Environmental and ecology groups
- Faith groups
- Health organisations including NHS Trusts
- House builders
- Housing associations
- Landowners
- Police and other emergency services
- Political parties
- Regeneration groups and partnerships
- Rivers and riverside interest groups
- Shopkeepers
- Sport and leisure groups
- Statutory consultees
- Tenants and residents' associations
- Town centre partnerships
- Transport groups
- Utility companies
- Women's groups
- Youth Groups

Consultation with relevant organisations working with gypsy and travellers in Lewisham and adjoining boroughs were also consulted where they were known to us. These groups include:

- London Gypsy and Travellers Unit (LGTU)
- Lewisham Outreach Service for Gypsy and Roma Travellers
- Lewisham Traveller Forum
- The Traveller Movement
- Southwark Travellers Action Group

Appendix 3 – Notification of Public Consultation

Claire Gray, Planning Policy Manager
Planning Service
Resources and Regeneration
London Borough of Lewisham
3rd floor, Laurence House
Catford
London SE6 4RU

Tel: 020 8314 7400
planning.policy@lewisham.gov.uk

Name

14th October 2016

Dear Sir or Madam

Re: Lewisham Gypsy & Traveller Sites consultation

Lewisham Council is preparing a planning policy document called the Gypsy and Traveller Site(s) Local Plan. It will identify a site to meet the local accommodation needs of the borough's travelling community.

We have found that the travelling community needs at least six pitches in the borough over the next 15 years. Following our consultation in March/April 2016 on site search parameters and criteria for assessing sites, we are seeking feedback on two potential locations for a new residential site. Only one of these sites will be needed.

The sites we are looking at are:

- New Cross Social Club and adjoining land in Hornshay Street, New Cross, SE15 1HB
- land next to Pool Court, Catford, SE6

It's important that we get your comments and suggestions about these sites. We will take into account your views when we make our final selection.

You can comment until: **Wednesday 30 November 2016.**

Tell us what you think

Read the consultation documents and then complete a short survey.

- *Online:* www.lewisham.gov.uk/travellingcommunity
- *At Council's Planning Information Office:* Ground Floor, Laurence House, 1 Catford Road, London, SE6 4RU (Monday to Friday 9am to 1pm, or on request during office hours)
- *At local libraries:* visit www.lewisham.gov.uk/libraries or call 020 8314 6399 for details of library locations and opening hours.

If you prefer, you can email your comments to planning.policy@lewisham.gov.uk or write to:
Claire Gray, Planning Policy Manager
Lewisham Council, 3rd Floor Laurence House
Catford, SE6 4RU

To be considered, your comments must include your name and an email or postal address. We want to foster good relationships between all our communities and we will not consider any consultation responses that include prejudicial or discriminatory comments or language.

If you take part in this consultation, the Council will publish your name and the content of your response, but will not publish any part of your address or contact details. We will not acknowledge receipt of your comments.

Find out more

Come along to a community drop-in session. This is an opportunity to find out more about each potential site, ask questions and speak directly to council officers.

- **Catford:** Tuesday 1 November, Civic Suite, SE6 4RU
2-4pm and 6-8pm
- **New Cross:** Thursday 3 November, All Saints Community Centre, SE14 5DJ
2.30-6.30pm

If you have any queries please contact the planning policy team on 020 8314 7400.

Yours sincerely,

Claire Gray

Planning Policy Manager

Frequently Asked Questions

Why have I received this?

Lewisham's Planning Service maintains a database of individuals and organisations that have an interest in borough planning policy. This database is continually updated and is used to inform the interested parties of consultation stages. This list is managed in accordance with the Data Protection Act 1998. Anyone wishing to be added to, or deleted from, this list should e-mail planning.policy@lewisham.gov.uk or write to us at the address provided in this correspondence.

What is this consultation?

The process we have to follow when preparing our planning documents is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 and amendments.

Regulation 18 specifies that at an early stage we should invite comments from relevant individuals and organisations on the issues the local plan should address. In March/April 2016 we identified the issues the local plan is likely to include and sought comments on the scope, site search parameters and selection criteria.

We are now carrying out a second stage of the Regulation 18 consultation to seek comments on two potential locations for a new residential site in order to meet the local accommodation needs of the borough's travelling community.

We are also consulting on an Integrated Impact Assessment which assesses the social, environmental, economic and equalities impacts of the potential sites.

Appendix 4 - Press Notice: News Shopper

02380 424467 Newsdesk: 020 8722 6348 October 19, 2016

LONDON BOROUGH OF LEWISHAM

Public participation on the preparation of a local plan

Lewisham Council is preparing a planning policy document called the Gypsy & Traveller Site(s) Local Plan. It will identify a site to meet the local accommodation needs of the borough's travelling community.

We are seeking feedback on two potential locations for a new residential site. Only one of these sites will be needed. The sites we are looking at are:

- New Cross Social Club and adjoining land in Hornshay Street, New Cross SE15 1HB
- land next to Pool Court, Catford SE6

You can comment until **Wednesday 30 November 2016**.

Tell us what you think

Read the consultation documents and then complete a short survey.

- Online: www.lewisham.gov.uk/travellingcommunity
- Council's Planning Information Office: Ground Floor, Laurence House, 1 Catford Road, London, SE6 4RU (Monday to Friday 9am to 1pm, or on request during office hours)
- Local libraries: visit www.lewisham.gov.uk/libraries or call 020 8314 6399 for details of locations and opening hours.

If you prefer, you can email your comments to planning.policy@lewisham.gov.uk or write to:
Claire Gray, Planning Policy Manager, Lewisham Council, 3rd Floor Laurence House
Catford SE6 4RU

To be considered, your comments must include your name and an email or postal address. We will not consider any consultation responses that include prejudicial or discriminatory comments or language. All comments are public. We will not acknowledge receipt of your comments.

Find out more

Come along to a community drop-in session. This is an opportunity to find out more about each potential site, ask questions and speak directly to council officers.

- **Catford:** Tuesday 1 November, Civic Suite, SE6 4RU, 2-4pm and 6-8pm
- **New Cross:** Thursday 3 November, All Saints Community Centre, SE14 5DJ, 2.30-6.30pm

For any queries please contact the Planning Policy team on 020 8314 7400.

E. TALBOT Head of Planning,
Laurence House, 1 Catford Road, SE6 4RU
19th October 2016



Lewisham

Appendix 5: List of organisations and individuals that responded

Groups and organisations

The Wheelshunters Club; Southern Gas; National Grid; Thames Water; Natural England; Historic England; GLA; TFL; London Borough of Bexley; Environment Agency; Network Rail; Lewisham Clinical Commissioning Group; London Borough of Bromley; Enfield Council; Metropolitan Police; Lewisham Police Partnership Team; London Gypsy and Traveller Unit ; Multimac Surfaces Ltd; Outreach Service for Gypsy Roma Travellers; Phoenix Community Housing; Housing for Women; Bellingham Interagency; NXG Trust -REMEC - NX Learning – Sommerville; Bellingham Councillors; London Borough of Lewisham, Environmental Protection Team; London Borough of Lewisham, Ecology Regeneration & Open Space Policy Manager; Lovelinch Close oppose the Traveller Site; Pool Court Petition; The New Cross Gate Trust; London Borough of Lewisham Public Health.

Individuals and others

Emma Little; Karen Smith; Trina Lynskey; Duncan Morrison; Svea Polster Broughton; Ian Duffy; Dean Houson; Graham Carter; Amy Quinn; RCKa Architects; Laura Walmsley; Din Parker; Nathan Flowers; Juliette Hart; Ben Farber; Robin Gay; Tony Urquhart; Ala Jelisejeva; S Scott; Robin Morgan; Ben Neverest; Ferenc Morath; Ian Richardson; Linda McAlister; Ben Allan; Matthew Wilson; Renie Anjeh; The oromo Peoples Liberation Front; Victoria Smith; Chris Seline; Kay Smith; Kate Atkinson; Paul Crompton; Derrick Doggs; Chloe Saad; Sean Spurr; Shayna Doing; Anna Robertson Davis; Naomi Goodman; Bianca Kent; Kathleen Ferguson; A Kennedy; Liz B; S Holman; Manny Cooke; Joyce Thrussell; Alina Tuerk; James Holland; Clare Deacon; S. Mason-Whitfield; Adam Perkins; Maria Berry; Ralph Jelbart; Jean Mullen; Culverley Green Residents Association; Jackie Bygrave; Dionne Cole; Anita Sangwa; K. Schulze; Paul Sutton; Karen Pretorius; Vienna Man; Maureen Decca; Anna Taylor; Andrew Wright; Sabrina Poma; Moira Scarlett; Richard Catford; Laura Harvey; Thom Townsend; Robin Lee-Perrella; Meryl White; Cllr. Brenda Dacres; Polly Wicks; Linda Harris; Ahmed Sami; Sonia King; Georgia Smith; Martin Quinlan; Rebecca Strang; Danniella Davies; Lorraine Hone; Van Luc; Sofia Akhazzan; Jenni Korkut; Kelly Edwards; J.H; C. Smith; G. C; Jessica Cooper; Raquel Vidal; Judith Seymour; Aimee McCorkindale; Deborah Wellard; Neil Green; Pascal Aholou; Freda Carter; Evelyn Parents Forum; Jumoke Babayomi; Daphne Cox; Sheila Browne; Enrique Perez Alvarez; Yvonne Robinson-Smith; Nicoli Smith-Farquharson; Elizabeth Dunn; Lorrene Francis; V.B; Fiona Lockwoo; Tim Hussey; Thelma Miller; Ellaoise Westwood; Pamela Martin, Queens Road Partnership Surgery; Fernando Lopez; Maria Teresa, Alvarez Louise McRae; Nik Antoniadis; Mark and Pauline Ogden; Cath James; Stephen Duckworth; Elizabeth Plant; Jo Lancaster; Magdalena Przekop; Gary Lynch; Jeffrey Worthy; Tara Ashton-Johnson; Charlotte Giddings; David Pearson; Ronnie Ridgers; David Tancred; Tania Saldanha; Fergus Grimes; Fiona McEwe; Adam McWilliams, Jenny Matthews; Jamel Nelson-Tyer; Djeneba Kouyate; Mariama Turay; Sussannah Odisae; Linda Williams; Karen Street; Public Health, Lewisham; Catherine Lawrence; Miriam Gayfer; Alan Smart; Samuel Lahai; Andrew Keats; Antonia Parkins; Kieran Gallagher; Fatemeh Wallijani; JaneRobinson; Ian Davenport; Susana Guedes; Sharon Chadwick; William Smith; Joyce Turpin; Rufine Nouteli; Titus Idun; Mrs N. Ozkan; Samantha Harewood; Richard Hayes; Hermin Delores Gayle; Kallum Duncan West; Hazel Massiah; O. Sanusi; Dean Terrelonge; Samantha West; Alicia X; Treasa Mongan; Bridget Mongan, Margaret Mongan; Mrs M. McCarthy; Maria Melsom; Elizabeth Emmanuel; Josephine Donoghue; Winnie Sweeney; Rufine Nouteli; Dan Parkes; William Edwards; Wendy Whitaker; Maedi Bohem; Sunny Abim; H. McArdle; Liz Crocker; Tanya Phillipson; Glynnis Emmerson; W.E Koch; Florence Ebeye; Guy Barzily; Janine Palmer; Debbie Aitken; Miriam Gayfer; Shontelle Williams; Scott Barkwith; Michael Street; Matt Lacey; Cynthia Davis; Theo Hawkins; Warren Keefe; Irene Byworth

Appendix 6 - Representations received in relation to the potential New Cross Site

Please note this appendix summaries comments received from surveys and written responses. Appendix 6 contains three tables as follows:

- 1) **Table A6i:** Summary of representations received from specific and general bodies in relation to the suitability of allocating the New Cross site as a residential traveller site and proposed development guidelines.
- 2) **Table A6ii:** Summary of matters raised by individuals (travelling and non-travelling travelers, residents, businesses, community groups and landowners) comments indicating the New Cross site is not a suitable site for allocation as a gypsy and traveller site including comments on proposed development guidelines and other matters.
- 3) **Table A6iii:** Summary of matters raised by individuals (travelling and non-travelling travelers, residents, businesses, community groups and landowners) comments indicating the New Cross site is a suitable site for allocation as a gypsy and traveller site including comments on proposed development guidelines and other matters.

Table A6i: Summary of representations received from specific and general bodies (New Cross)

Consultee	Site Suitability	Summary of representation	Officer Response
Environment Agency	The suitability of the site might be hard to demonstrate.	<ul style="list-style-type: none"> • It might be difficult for the applicant to demonstrate that ‘highly vulnerable’ developments, such as caravan sites, would be safe (in flood risk terms), particularly in the case of the Pool Court site which is undefended and where the available modelling doesn’t yet include the new climate change allowances. • Site is situated within Flood Zone 3 and considered to be ‘High Risk’ but does benefit from being defended by the Thames Tidal Defences. Proposal site situated within the 6-12 hours rate of inundation zone and described as ‘significant’ hazard with the Lewisham Strategic Flood Risk Assessment (SFRA). Development area lies within the currently modelling areas at risk of residual flooding, assuming a breach in, or overtopping, of the flood defences. • The EA routinely request that applicants consider the outputs of our tidal River Thames upstream inundation modelling, 	<p>Whilst in Flood Zone 3a, the site is protected by Thames flood defences. The site is theoretically at risk from Upstream Inundation of the Thames area in the scenario that lateral flood defences were removed and the Thames Barrier was closed. However, this is considered an unlikely scenario and in any event flood waters would take 6-12 hours to reach the site.</p> <p>Following further discussions with the Environment Agency, officers consider that there is a reasonable prospect of a traveller site being acceptable from a fluvial flooding point of view, providing that a robust detailed case is made and that adequate mitigation is incorporated,</p>

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<p>where a site is located outside the extent of our tidal River Thames breach modelling, but located within the extent of our upstream inundation modelling.</p> <ul style="list-style-type: none"> The Lewisham SFRA contains specific criteria for safe access and egress being situated above a Q200 year plus climate change flood level. 	including flood warnings
Historic England	No objection to the site stated, but matters of conservation are identified.	<ul style="list-style-type: none"> Potential impact of development on the Hatcham Conservation Area should be considered. Site is not within an archaeological of known archaeological potential and of a limited scale. A requirement for archeological consideration of the site in the event of a planning application is not anticipated. 	Officers consider that a traveller site in this location would have no significant impact on the Hatcham Conservation Area (which is some distance away to the south). The Integrated Impact Assessment (October 2017) confirms this view.
Greater London Authority (GLA)	No objection to this site being allocated however re-provision of community use is necessary.	<ul style="list-style-type: none"> No objection to this site being allocated for additional pitches needed to meet the needed of Gypsies and Travellers. However, if this site is chosen the Multi Use Game Area (MUGA) and the community use of the hall should be re-provided in line with London Plan policies 3.16 and 3.19. 	Noted. See response to comments from The Wheelshunters Club and the New Cross Gate Trust.
Lewisham Homes (Head of Housing)	General concern about challenges facing the Winslade Estate	<ul style="list-style-type: none"> There are a lot of issues that we're currently dealing with on the estate around ant social behaviour, drug dealing and gang problems. We are working in close partnership with the police and LBL's crime enforcement and regulation service and have an action plan in place. Adding more potential problems to the estate might not be the best thing right now. 	Noted.

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
Lewisham Police Partnership Team	No objection to the proposed site allocation, however more supportive of the Pool Court Site at this stage.	<ul style="list-style-type: none"> Lewisham would at this stage be more supportive of the Pool Court site. Recognise the potential for discrimination against the Travelling Community and the sensitivities that the local community may have in both areas shortlisted. 	Noted.
London Borough of Bexley	No objection to the site stated.	<ul style="list-style-type: none"> Support an approach whereby each local planning authority in the southeast London sub-region seeks to meet its own need. LB Bexley does not have any capacity to provide pitches for Lewisham's identified need in the event that neither of the proposed sites can be delivered. 	Noted. Officers will continue to work with neighbouring local planning authorities as part of fulfilling its Duty to Co-operate obligation.
London Borough of Bromley	No objection to the site stated.	<ul style="list-style-type: none"> Response to the Lewisham Gypsy and Traveller Accommodation Assessment. Para 3.6 - Traveller Definitions: Information from ORS study suggests that only a small proportion of the potential need identified from these households will need new Gypsy and Traveller pitches, and that the majority will need to be addressed through the SHMA. Paras 4.5 and Paras 5.10 - 5.11 - Interviews with Travellers in Bricks & Mortar: Bromley has engaged with the support worker in relation to the needs of travellers with Lewisham connections (family / Lewisham Traveller Group) currently in bricks and mortar accommodation in neighbouring boroughs, who would be interested in pitches in SE London. 	<p>Noted. Officers will continue to work with neighbouring local planning authorities as part of fulfilling its Duty to Co-operate obligation.</p> <p>Officers consider that the assessment that there is a lack of need for plots for travelling show people is reasonable and will continue to address wider sub-regional traveller and show people needs, including the need for transit sites, through Duty to Co Operate discussions with neighbouring boroughs.</p>

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> • The Pitch Needs - "Non-Lewisham" Gypsies and Travellers section deals with travellers with an historical link to Lewisham currently residing in bricks and mortar outside the Borough. It suggests that "The Council should work with neighbouring authorities to consider their accommodation needs". • Bromley considers the needs of those on its waiting list, provides a realistic understanding of families who have an evidenced desire to locate on Bromley pitches although waiting list application alone is not necessarily proof of need or confirmation that the applicants meet the new definition. Lewisham currently has no authorised sites, however, once Lewisham opens a site/s, a waiting list may attract applications from these families in brick and mortar with links to Lewisham. • Paras 5.12 – 5.14 Travelling Show Persons Accommodation: The zero requirement for Travelling Show people, (from the main 2015 Lewisham GTAA) is determined on the basis that there are currently no yards in Lewisham and the view of a representative of the Showman's Guild of Great Britain that they would be looking at existing yards and surrounding land (presumably in Bromley) as "this would be less onerous than seeking new land for yards." This is a circular argument with the lack of an allocation (making new yards onerous) being used to justify the zero allocation. • Transit Provision: The GTAA does not recommend that Lewisham Council consider any transit provision on the basis that there were "only 18 unauthorised encampments from April 2015 - early 2016. This number of incursions is of a similar order to that experienced by Bromley. Bromley's Proposed Submission Draft Local Plan (2016) draft Policy 12 indicates 	

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
		that, with regard to transit pitches, “the Council will work with the sub region to secure their provision in an appropriate location within the sub region”. Such work will be undertaken mindful of the numbers of incursions experienced by boroughs and the sub regional provision for Travelling Show people that Bromley already provides.	
London Borough of Enfield	No objection to the proposed site allocation stated.	<ul style="list-style-type: none"> Given the physical distance between boroughs, the delivery of new pitches in Lewisham would be unlikely to impact on Enfield. 	Noted.
London Gypsy & Traveller Unit (LGTU)	No objection to the proposed site allocation stated.	<ul style="list-style-type: none"> Both proposed site allocations suitable for the accommodation of the 6 pitches needed. However, there are constraints for each of the sites that have to be mitigated and it is therefore too early to choose a preferred option. Need to develop a clear plan on how the Multi Use Games Area and social club will be relocated to a suitable, accessible and convenient location so as to ensure there won't be any loss of social infrastructure. The next iteration of the plan should set out the clear phases of delivery of both the Gypsy and Traveller site and the relocation of these facilities. The fact that the site is in the council's ownership is an advantage. 	<p>Further investigations have taken place in relation to the Multi Use Games Area. See response to the New Cross Gate Trust.</p> <p>In terms of the loss of the existing Social Club building, please see response to the Wheelshunters Club.</p>
National Grid	No objection to the proposed site	<ul style="list-style-type: none"> National Grid has no comments to make in response to this consultation. 	Noted.

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
	allocation stated.		
Natural England	No objection to the proposed site allocation stated.	<ul style="list-style-type: none"> Natural England has no comments 	Noted.
Network Rail	In principle Network Rail has no objection to the designation of the site	<ul style="list-style-type: none"> Site is located adjacent to Network Rail's Operational Assets and Infrastructure the council will need to be aware of and consider Network Rail's standard asset protection guidelines and requirements when developing the site. 	Noted.
New Cross Gate Trust	Strong objection to the proposed allocation.	<ul style="list-style-type: none"> Very much object to the site being allocated as a Gypsy and Traveller site – this is a very deprived neighbourhood, already struggling with issues of violent crime, social cohesion, lack of facilities, contamination, and antisocial behaviour. Very unfair to add another challenge to the residents of the estate. <p>Concentration of Sites</p> <ul style="list-style-type: none"> Existing high concentration of traveller sites in the local area with 5 in close proximity within the LB Southwark Concentration of community with distinct needs within a limited area will have particular impacts on local services and infrastructure, such as schools and infrastructure (open spaces - from activities such as horse-riding) <p>Access</p> <ul style="list-style-type: none"> If nearby entrance to the estate is closed this would generate access issues with the caravans having to access the site through the estate via the other entrance to the north. Implications: unacceptable risks concerning health and safety with regards to heavy vehicles going through the estate. Loss of existing local businesses which operate along this section of the road 	<p>Concentration of sites</p> <p>The issue was raised by a number of individuals during consultation on the draft Search Parameters and Site Selection Criteria. However, in July 2016, the Mayor and Cabinet accepted officer's response that given the size of the borough and the difficulties involved in locating a site for Gypsy and Traveller use, an 'exclusion zone' was not appropriate. Such a restriction would be excessively restrictive in terms of site identification and the justification in terms of the impact on local services and resources is unsubstantiated.</p> <p>Access</p> <p>Access to and from the site would be via Hornshay Street and there should be no need to use roads on the Winslade Estate (N.B. Lewisham Homes has introduced a gate to the southern end of Lovelinch Close and Sharrat Street as part of wider</p>

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<p>Loss of Community Facilities</p> <ul style="list-style-type: none"> • Ballcourt – only facility available to residents on the estate. Ballcourt created through NDC funding to regenerate the end of the estate, and the land was given over for this purpose. • Not acceptable to remove the MUGA – very well used and needed resource. • Promises to ‘improve existing facilities’ – inappropriate as there are no existing facilities • Consequence: very negative impact on the physical health of the community and on social inclusion, as the community will lose two valuable resources (ballcourt and the social club), as places where people can meet and socialise. No alternatives – Scotney Hall currently unusable due to repairs <p>Relocation of Ballcourt/MUGA</p> <ul style="list-style-type: none"> • Claims that the ballcourt will be re-provided elsewhere are insufficient, as there are no proposals of where replacement will be. • Any replacement provision is unlikely to be close to the estate • Relocation to Bridgehouse Meadows would be unacceptable – it would get less use and there would be no natural surveillance for the young people using it <p>Trees/Landscaping</p> <ul style="list-style-type: none"> • No mention of type of trees which would be planted. Incredibly important. Height, coniferous/deciduous, growth speed, maintenance, impact of roots etc, all need to take into consideration. • Trees should surround the site not just planted along one bit of road 	<p>traffic management arrangements for the Estate designed to tackle anti-social behavior). Proposals should not directly impact on existing businesses.</p> <p>Loss of MUGA The Potential Sites Consultation Report made clear that mitigation for the loss of the existing MUGA would be required by way of improvements to an existing facility or a replacement facility. Officers have commissioned a feasibility study in to providing replacement facilities on a garage and hardstanding area adjacent to Upnall House, directly opposite the potential site on the north side of Hornshay Street. The study finds that this space could provide 1 multi-use games area and a team area of approx.407sqm or a multi-use games area and separate informal basketball practice area of approx.323sqm. Whilst these options would mean that there would be a significant net loss of games space, it would enable replacement smaller facilities to be provided in the immediate area. Officers consider that facilitating the provision of a traveller site could represent special circumstances that justify such a loss of space.</p> <p>Officers have also commissioned a</p>

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<p>Consultation Methods</p> <ul style="list-style-type: none"> • Appropriate consultation methods not applied. None of the residents on the estate or surrounding area were aware of the proposals in the earlier stages, and we are only just being informed at the very last stage of site selection. <p>Integrated Impact Assessment</p> <ul style="list-style-type: none"> • Completely insufficient. To have table 4.2 presented as simply a tick box exercise suggests that planners have not even visited the site, spoken to local people, or spent any time understanding the use of the area. Many of the comments are based on flimsy asserts as opposed to proper, rigorous investigation of the likely impact. • Challenge assertions in point 9 (likely to remove flora and fauna elsewhere to replace the MUGA), point 6, point 8, point 11, point 13, point 14, point 15. • Point 5 needs more consideration and a perspective provided by local police. • All of these points could be challenged, and will be incredibly dependent on the care with which this policy is implemented <p>Shontelle Williams Report</p> <ul style="list-style-type: none"> • Points raised in detailed report produced by Shontelle Williams are endorsed by the New Cross Gate Trust 	<p>masterplan capacity study for this potential site. This suggests that it would be possible to provide 6 pitches whilst retaining the existing small kick-about area and informal basketball practice area. If this approach was taken and a replacement larger kick-about area provided on land at Upnall House, then there would be no loss of facilities and a small net gain in space (approx. 760sqm as opposed to the existing 720sqm). The masterplan capacity study also identifies an option of providing 6 pitches with individual vehicular accesses and replacement MUGA and games court area on the site of the existing Social Club car park that may be able to retain all facilities and avoid any net loss in space.</p> <p>Whilst there has been some discussion with Lewisham Homes about the Upnall House option, there has been no consultation with local residents or users of the existing games courts about this or the masterplan capacity study. This would take place if this potential site was chosen to go forward.</p> <p>Loss of Social Club See response to the Wheelshunters Club.</p> <p>Trees/Landscaping</p>

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
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			<p>Details of tree planting would be considered in detail if this potential site went forward.</p> <p>Consultation methods Consultation can always be better. However, officers consider that high quality consultation took place in accordance with the relevant regulations and the Council's Statement of Community Involvement.</p> <p>Integrated Impact Assessment The updated Integrated Impact Assessment (October 2017) takes account of these and other comments and officers consider that it provides an adequate assessment of the two potential sites.</p>
New Cross Learning	Object to proposed site allocation	<ul style="list-style-type: none"> • Object to New Cross site. • Would deprive Winslade Estate of one of the few facilities for young people and social/community area for residents on the estate. • Must be an alternative location for a Gypsy and Traveller site within Lewisham. 	Noted – see responses to the New Cross Gate Trust and the Wheelshunters Club.
NHS Lewisham Clinical Commissioning Group	No objected to the proposed site allocation stated	Lewisham CCG feel that the impact on health services in the area would be minimal.	Noted.
Outreach	No objected to the	<ul style="list-style-type: none"> • Both proposed site locations appear to be of a suitable size to 	Noted - see responses to the New Cross

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
service for Gypsy and Roma Travellers, Lewisham Irish Community Centre	proposed site allocation stated, however a number of issues are raised.	<p>accommodate the 6 pitches needed. There are advantages and disadvantages to each of the proposed site locations.</p> <ul style="list-style-type: none"> • Very few of the Travellers currently residing in Lewisham are living in and around New Cross, which is very built up, and is close to a regeneration area in the adjoining borough. This regeneration programme is liable to increase population density, making the area less suitable for a Traveller site. There are also two existing Traveller sites run by Southwark council very close to Lewisham's proposed New Cross site. • The potential loss of existing social infrastructure (the social club and games area) from the location could be best addressed by the council if a clear plan to relocate both facilities to suitable and accessible locations could be made and delivered before the council makes a final decision. • The next iteration of the plan should set out the clear phases of delivery of both the Gypsy and Traveller site and the relocation of these facilities. Any loss (or too distant re-location) of existing facilities would impair relationships between the existing local community and those who may move onto a new site located there. • The fact that the site is in the council's ownership is an advantage in terms of potential planning applications and financially, as no land would need to be purchased. 	Gate Trust and the Wheelshunters Club.
Queens Road Partnership Surgery	Object to the proposed site allocation.	<ul style="list-style-type: none"> • Site unsuitable due to removal of space young local people can use for sports in an area (Winslade Estate) where there are few recreational opportunities. 	Noted - see response to the New Cross Gate Trust.
REM Educational	Object to the proposed site	<ul style="list-style-type: none"> • Object to the location of the travellers site on Winslade Estate. There are no other facility outlets for the people in this area of 	Noted - see responses to the New Cross Gate Trust and the Wheelshunters Club.

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Consultee	Site Suitability	Summary of representation	Officer Response
Centre	allocation	<p>North Lewisham. Only other community outlet in area, Scotney Hall, has been out of action for over two years and repairs are taking their time.</p> <ul style="list-style-type: none"> • MUGA sports pen specifically constructed for children and young people in the area as a place where they could go and let off steam in a healthy and constructive way. It is well used. 	
Sommerville Youth and Play Provision	Object to the proposed site allocation	<ul style="list-style-type: none"> • Object to the New Cross Site 	Noted.
Southern Gas Network	No objection to the proposed site allocation	<ul style="list-style-type: none"> • Presence of various large diameter gas mains within the access area to both of the planned sites. The large diameter gas mains are located in the public highway. • These mains are 630mm / 48" in diameter and access to our plant would be needed 24/7m. Any impingement to our plant could cause us severe operational issues to our gas distribution network. • From safety point of view any bonfires, near our plant would be of concern. 	Noted – these issues could be included in site-specific Development Guidelines if this potential site was taken forward.
The Wheelshunters Club	Object to the proposed site allocation	<ul style="list-style-type: none"> • Wheelshunters Social Club – over 200 members. • Family friendly club supplying the local community with a meeting place. • Location close to Millwall football ground provides supporters with a safe and friendly meeting point before and after matches. 	The Social Club is a licensed bar and hall providing live entertainment and is open to hire for events (weddings etc.). It is also used by a local church for meetings. The building includes a residential flat. The loss of the Social Club and housing without mitigation would be against policy. However, this needs to be balanced against Core Strategy Policy 2 which makes clear that the Council will assess

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Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> • Manned carpark provides secure parking so people with young children can feel safe attending the match. • Club has large function room with space for different events for different local groups and organisations, including the local travelling community • Also provide the use of 2 football pitches for the youths of the area • Staff working at the club would lose their jobs • A family who live above would need rehousing • Existing travellers site at the bottom of Ilderton Road near South Bermondsey Station, another behind Toys R Us, Old Kent Road, and near New Cross Gate. Area already services the travelling community and adding another site will (disproportionately) increase the presence of one type of community within the area –and impacting on the ability to maintain good relations within the community • Supporting documents don't show what going concerns are already doing for the local area 	<p>and provide for the identified needs of the gypsy and traveller community. Officers consider that facilitating the provision of a traveller site (which would result in a net gain of residential accommodation) could represent special circumstances that justify the loss of the Social Club and existing residential flat.</p> <p>During a stakeholder meeting, the current tenants (the Wheelshunters Club) asked whether there would be an opportunity for them to get involved in the redevelopment of Scotney Hall on Sharratt Street. The Hall re-opened at the end of April 2017 following refurbishment. It may be able to accommodate some of the functions currently offered by the Social Club (e.g. weddings), but officers do not consider that this would be a suitable location for a licensed private members club. The Council could provide the Wheelshunters Club with the maximum notice possible to vacate the premises and assist it suitable alternative accommodation in the area.</p>
Thames Water	No objection stated.	<ul style="list-style-type: none"> • For Thames Water to comment on the sewerage requirements of the sites being considered and the impact on existing systems an indication of the location and number of pitches proposed, would be necessary. However, in very general terms for the small number of new units proposed Thames Water don't expect any major concerns. 	Noted – these issues could be included in site-specific Development Guidelines if this potential site was taken forward.

Table A6i: Summary of representations received from specific and general bodies (New Cross)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> In the absence of sewers within the vicinity, the developer of the accommodation will be required to make provision for wastewater services either, after consultation with Thames Water, lay a sewer (at his/her own expense) from the site to an appropriate and agreed connection point on the public sewerage network and offer this for adoption or make some form of onsite provision to the disposal of wastewater, septic tank for example. 	
Transport for London (TFL)	No objection stated.	<ul style="list-style-type: none"> This site does not raise any strategic transport issues 	Noted.

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Site size, capacity & location	<ul style="list-style-type: none"> Unsuitable due to size. The site is not sufficient for what is proposed. Traveller families have larger families than average and so need large sites wherever possible The site at New Cross will only provide pitches for the travelling community of 400sqm. At the Pool Site these will be a much larger 500sqm, providing more space and a nicer living environment. The area is densely populated and in an area of rapid population growth. Too add more people is out of the question. The site is too close to flats and in the middle of too many people. There are several other traveller sites nearby and there is enough in 	<p>The potential site has been identified as 'Good' for six of the relevant Site Selection Criteria and 'Average' for the remaining three and officers consider that it is suitable. The draft Masterplan Capacity study demonstrates that the potential site could accommodate at least six traveller pitches.</p> <p>The issue of proximity to existing traveller sites was raised by a number of individuals during consultation on the draft Search Parameters and Site Selection Criteria. However, in July 2016, the Mayor and Cabinet accepted officer's</p>

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<p>this area</p> <ul style="list-style-type: none"> • The site could be developed to provide housing to meet Lewisham Council's housing need as well as re-providing social infrastructure / This site could house a significant amount of people / The site is better suited to high density housing to meet the boroughs acute housing need. • This is a Zone 2 area of London which is meant to be earmarked for regeneration • Lewisham should be reacting to Southwark's Old Kent Road Masterplan by creating their own masterplan for Lewisham's land in this area including this site, which should be focused on providing as many homes as possible. 	<p>response that given the size of the borough and the difficulties involved in locating a site for Gypsy and Traveller use, an 'exclusion zone' was not appropriate. Such a restriction would be excessively restrictive in terms of site identification and the justification in terms of the impact on local services and resources is unsubstantiated (see Table 8 in the main part of the Consultation Statement).</p> <p>The Metropolitan Police recognise the concerns raised by some travellers about the fear of intimidation from travellers living in Southwark and is more supportive of the Pool Court site. Officers too accept that these fears are genuine. However, a site would not be provided for individuals but for the Lewisham traveler community. Suitable pitch allocation and management arrangements would enable those people with a Lewisham connection who wanted to live on a site to apply and pitches would be allocated based on housing need.</p> <p>Officers acknowledge that the potential site is within the Regeneration and Growth Area (as defined in the Council's Core Strategy) and is in the London Plan Lewisham, Catford and New Cross Opportunity area and adjacent to the London Plan Old Kent Road Opportunity Area.</p>
Physical and social integration	<ul style="list-style-type: none"> • The site is too far from my family • The site is unsuitable for resettlement as the traveler community would need to be closer to the countryside in order to live more accordingly with their tradition • The community centre and sports / games have been placed there to encourage participation and community engagement and to lose 	<p>See response to New Cross Trust above (Table A6i) in relation to loss of the MUGA.</p> <p>See response on impact on an area of deprivation (below) in relation to social integration.</p>

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<p>them would be a terrible loss to the community. Every time I pass the games areas on my bike, I see people playing, I think the value of playing and keeping people exercising is key to community development.</p> <ul style="list-style-type: none"> • My experience with travellers is that they want to keep separate and they wouldn't integrate • The visible use of both the games area and the social hall creates a real sense of community, and makes life on the estate more pleasant than it would be without these facilities. It is nice to see people enjoying themselves in the area 	
Impact on area of deprivation	<ul style="list-style-type: none"> • In a low-income area where involvement is restricted by cost, outdoors spaces that are free to use and close enough to home to allow children to use them regularly are especially important. There is not a huge amount to keep people entertained. • There will be a very negative impact on health / childhood obesity. The ballcourt is the only facility available to residents on the estate. • This is a very bad idea you cannot take from one deprived community to give to another. • New Cross remains the dumping ground for many of the boroughs problems and we never hear any plans from Lewisham Council about how they intend to regenerate New Cross • I object to this site being used for Travellers because this area needs a lot of money spending on it to improve it. • It is inappropriate to bring a site to an estate that has already so many issues going on and which are not being sorted out. Before the Council thinks of anything, it should deal with what is at hand first • This area of the borough already feels forgotten and lacking in facilities. There are innate issues with the area and this will compound those views by removing what little facilities they have. 	<p>See response to New Cross Gate Trust (Table A6i).</p> <p>New Cross is the second most deprived Ward in Lewisham and is within the 20% most deprived neighbourhoods (Lower Layer Super Output Areas) in the country.</p> <p>Introducing a traveller site here would pose challenges to creating and maintaining a mixed and balanced community in the wider neighbourhood. If this site were to be chosen, the Council and its partners would need to strengthen their efforts to increase the capacity and resilience of local communities. In addition, officers recommend that the Outreach Worker facilitates meetings between local residents and members of the Lewisham traveller community to build understanding and community cohesion during the detailed design, planning stages and beyond.</p>

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Services & infrastructure	<ul style="list-style-type: none"> Schools are overflowing/packed and there's no space and the doctor's surgery most people use is the Queens Road partnership surgery and it is full up. 	<p>The traveller community does have particular needs around education and health and faces particular challenges in accessing health, education and other services. Officers have engaged with the Council's School Places Manager and NHS Lewisham Clinical Commissioning Group (CCG) at all stages of the process. The CCG has responded to the latest consultation stating that it considers that the impact on health services would be minimal for either site.</p> <p>Officers do not envisage that the population generated by the provision of a site (circa 20-25 people) would add undue pressure on local infrastructure or services. However, it is recommended that liaison takes place with local schools and GP surgeries once a preferred site is known to enable them to make any adjustments to service provision that may be necessary in advance of a site being first occupied.</p>
Concentration of travellers sites	<ul style="list-style-type: none"> The site is too close to the Southwark sites and local people will be full of complaints about the travelers. One area is taking the responsibility for all travellers sites and there should be an equal integration across the area. Gypsy & Traveller families should not be forced to live in a very limited geographical area. It makes it more difficult to house families separately for example if there was a domestic violence or intimidation issue. We do not think that LB Lewisham has fulfilled its duty to cooperate with LB Southwark on the development of this local plan, or Lewisham would be aware of this overconcentration, and the impact that this is likely to have on local schools and other services. During the consultation on 3 November 2016 it was stated that all travellers site must be 3 miles from each other. I don't feel we [travellers] would be welcome at the site. 	See response to New Cross Gate Trust in Table A61.

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Parking, access and highways	<ul style="list-style-type: none"> The allocation would exacerbate existing problems: parked and abandoned cars, pressure on public transport, access for emergency vehicles, parking issues on the Winslade Estate. Travellers will park their vans everywhere. There will be access issues: due to mechanics working at the end of the road, smashed and untaxed cars continuously dumped in front of social club along with the surrounding areas and with the caravans having to access the site through the Winslade Estate from the other entrance to the north. There is [in]adequate width for caravans and emergency vehicles. Ilderton Road is a very busy inter-connecting road and there could be traffic problems resulting from position of this site. There is also extensive development underway in the area around Grinstead Road/ Folkestone Gardens/ Trundleys Road, Evelyn Street/ Oxestalls Road and Canada Water placing pressure on the highways. 	<p>Concerns about abandoned cars are noted.</p> <p>The Highway and Access Feasibility Report (October 2016) tested vehicular access and turning space requirements for an occasional delivery of a large mobile home to a site (18.5m vehicles, which are longer than a fire engine). The study found that this was achievable, but noted that parking restrictions would need to be introduced opposite an entrance (likely to displace 6 kerb-side spaces) and that large vehicles would need to be guided in and out of a site.</p> <p>The above would result in some loss of kerb-side parking opportunities, as referred to above, but this would be partly off-set by closing the existing vehicular access to the Social Club car parking – so the net loss is likely to be in the order of 4 to 6 spaces.</p>
Amenity & Environmental Quality	<ul style="list-style-type: none"> The area is densely populated and would be too close to nearby housing. When travellers left a nearby site at a mountain of refuse was left on the site Bigger boys will start playing football outside Upnall house again making a terrible racket and destroy gardens with their footballs again. The whole area and Lovelinch Close will look very rough. In future there will be more noise (especially in the evenings), smoke and fire from burnt wood, rubbish, BBQs etc. There will be a negative effect of the site on local environmental quality (noise, air quality) and on the health and wellbeing of people. There are already noise issues on the meadows who use the space to ride motorbikes and quad bikes, by housing them next to the 	<p>The potential site is between approx. 13 and 18m to the south of Saltwood House (a four-storey block of flats that looks directly on to the site) and approx. 22m to the south of Upnall House (a four-storey block of flats that presents a blank flank wall to the site).</p> <p>There are many streets in London where homes face each other across a street that is 13m wide. In this case, pitches would contain single-storey caravans/small buildings and homes in Saltwood house would look down on them. The site-specific guidance included in the Potential Sites Consultation Report calls for a boundary treatment that protects the privacy of residents living on the site and tree planting to improve the street scene. With these things in place, the privacy of existing residents of Saltwood House</p>

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<p>meadows will only make the noise issues worse</p> <ul style="list-style-type: none"> • Creates fly tipping issues / There is a very bad dumping issue locally which Lewisham are already failing to control and this will get worse if travellers are allowed to be sited in the area 	and future residents of a site should be safeguarded.
Flood Risk & Water Management	<ul style="list-style-type: none"> • How would flood issues be dealt with? 	See response to the Environment Agency (Table A6i).
Safety	<ul style="list-style-type: none"> • There is a risk of greater anti-social behavior and there are issues of existing anti-social behaviour on the estate, creating more pressure on an already stretched police force and making the site less appealing to local residents • The existing MUGA location is a safe location for children to play • The Council could better meet its legal requirements by co-working with neighbouring boroughs to share cost and enable a single unified site which can be securely policed. • Add multiple CCTV to any site. • New Cross suffers from a high threat of violent and knife crime and attacks are often indiscriminate. If the site is to be chosen for residential use, the occupiers should be provided with safety advice on how to make their buildings/homes secure and safe from violent attacks. • Some Travellers cause crime and the wider community are justifiably afraid of such settlements • If the site is taken over we will be on streets where we teenagers are more likely to cause problems due to boredom etc. • The Traveller presence in new Cross has already been massively detrimental during the illegal squats next to New Cross Gate station. I think New Cross has already had enough and built up a huge reservoir of resentment. 	Officers acknowledge existing issues relating to anti-social behavior and that the existing MUGA is well located to provide facilities for older children and young adults living on the Winslade Estate.

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Loss of social club & housing unit	<ul style="list-style-type: none"> • The social club is used by older people and there isn't anything for them to do and would therefore be a loss. • The Wheelshunters Club has been used for some community occasions and its replacement would be a loss of amenities. The club is already occupied and used for multiple public/community purposes, by various ethnic groups, ages. • I do not think the wider community should lose facilities without a clear solution for replacement. Displacement of current facilities should be a higher priority • The site forms a valuable recreational space within the community which allows for a number of users to play sports, watch gigs and engage in social activities with the New Cross area. These spaces form vital parts of the area and contribute to community building and overall health and happiness of residents in the area • No information is provided to explain the impact of losing the social club for the community. • As a working club [Wheelshunters] we have staff that would lose their jobs and a family who live above who would need rehoming. We also have a large function room which officers a space for all different types of events from birthday parties, christenings to charity events & churches of which we have 3 & a Sunday school. We offer a space for a lot of organisations. We also offer the hall to the travelling community as they often get turned away due to people discriminating against them. We have an over 50s club who meet regularly 	See response to the Wheelshunters Club (Table A6i)

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Loss of multi-use games area (MUGA)	<ul style="list-style-type: none"> • The loss of the MUGA is a loss on amenities for young people who do not have many facilities. This is something that teenagers use. There is only a play area for small kids and kids in the area need somewhere to play • Young people need better or more facilities not removal • A replacement area would be a long walk away as there is nothing nearby. • How can you justify pulling down these facilities when it took 9 years to complete the MUGA? We have nowhere for our kids to go and play in a safe environment. • Before the football pen was built, kids played football outside Lewis Silken House against the shutters disturbing residents. Relocating the MUGA will lead to trouble as the children and teenagers will become bored • [Travellers] Don't want to disturb the housed community by taking down their club and football pens • More information is needed about the current usage of the Multi Use Games Area and Social Club • There are limited spaces on the estate for other children and teenagers to meet, chat and play sport together. • It is a valued and well used facility for the estate • It is a focal point for the community bringing tangible social and health benefits • The existing location is close enough to home that children can go there themselves. Other sports areas are further away and would require crossing major roads (e.g., Old Kent Road), and realistically would require parental supervision to get there • From a development perspective, it is important for them to have space to develop independence, such as taking short journeys by themselves and playing unsupervised. 	See response to New Cross Gate Trust (Table A6i).

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<ul style="list-style-type: none"> • The MUGA prevents issues with ball games on the estate which create noise and disturbance such as broken windows. • The loss of the MUGA would deprive existing residents of opportunities for social and physical interaction • I see that the loss of the games fields could be mitigated with the development of another area, yet people are happy using that one, they go to that one, to suggest building another one seems ridiculous and would undoubtedly not be as convenient. • The integrated impact assessment itself notes the potentially negative impact that the loss of the community hall and sports facilities could have on social inclusion, community infrastructure and the health of local residents. • If you remove these you will only divide an already unsettled community. 	
Ownership & Deliverability	<ul style="list-style-type: none"> • It is understood by residents that there is a 25-year lease for the Multi Use Games Area • It is an inefficient use of public funds to demolish and relocated existing communities • While the consultation documents state that alternatives to the Social Club and MUGA may be provided at the proposed Surrey Canal Triangle development, relying on private developers to provide alternative facilities seems like a risky strategy. 	The freehold of the site is owned by the Council. The New Cross Social Working Men's Club initially had a 60-year lease of the whole site (up to January 2034). The land now occupied by the MUGA was surrendered to the Council in 2006, to allow for the MUGA to be built in consideration of the rent under the lease being reduced. In 2010, the Council granted a one year to the Wheelshunters Club to stay in the Social Club building. However, the initial 60-year lease was not terminated and remains in place. The Council will need to regularise the lease situation by taking appropriate steps to terminate this lease. The Wheelshunters Club also remains in occupation of the Social Club building and this occupational arrangement would need to be terminated.
Biodiversity	The idea that planting more trees in a small area already crowded is not workable	Officers consider that some tree planting along the Hornshay Street boundary could be possible.

Table A6ii Summary of matters raised by individuals as to why the New Cross site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Other matters	<ul style="list-style-type: none"> • This is not the best use of council tax. • Unfortunately, travellers near a property decline the value of properties and as a private property owner that is a major concern to me. • We also think that appropriate consultation methods have not been applied. None of the residents on the estate or surrounding area were aware of the proposals in the earlier stages, and we are only just being informed at the very last stage of site selection • It would be good to have more information on the plan for residents. For example: Will the site be open to the residence in the local area which are currently facing a housing shortage 	<ul style="list-style-type: none"> • Noted. • Property value is not a material planning consideration. • Consultation can always be better. However, officers consider that high quality consultation took place in accordance with the relevant regulations and Council's Statement of Community Involvement. • Officers have started to prepare a Pitch Allocation Scheme to establish a fair, transparent and equitable system for the allocation of pitches, with eligibility being based on the ability to demonstrate a 'local connection' with Lewisham. The intention is to consult on a draft Scheme once a preferred site has been identified. • The Potential Sites Consultation Report requires the submission of a Site Management Plan to accompany a planning application. An approved Plan for a site will be an important tool to ensuring a well-run site, establishing a flood evacuation plan and managing potential anti-social behaviour (such as burning off material).

Table A6iii Summary of matters raised by individuals as to why the New Cross site <u>is</u> not a suitable site and other matters		
Planning Matter	Summary	Officer Response

Table A6iii Summary of matters raised by individuals as to why the New Cross site <u>is</u> not a suitable site and other matters		
Planning Matter	Summary	Officer Response
Site size, capacity & location	<ul style="list-style-type: none"> • It is located away from other housing / less built up • Site is more open / has the best space • The land is already built on • More central location • Proximity to other traveller sites / There are already travelers in the community and would improve traveller community • I believe the Traveller community should decide. I have never been asked about where any other community should live. • The new cross land seems to give the travellers the requirements found within the consultation document without material impact to the families • There are already travelers in the community and would improve traveller community 	Noted. See responses to 'site size/capacity' and 'location' in Table A6ii.
Parking, access & highways	<ul style="list-style-type: none"> • Good access to main road network • Better access to public transport • Option for two entrances • Access from main roads an advantage 	Noted. See response to 'highway impact including parking' in Table A6ii.
Ownership & Delivery	<ul style="list-style-type: none"> • Low cost option as it is cheaper to deliver as the land is already owned by the Council / There is no requirement to purchase land as this site is owned by Lewisham Council • The land is currently vacant which avoids a large obstacle / no one needs to be moved • The new cross site is away from local housing which is likely to cause less disruption or complaints from local residents during the process. • The site is long due for redevelopment 	Noted. See response on ownership and deliverability issues in Table A6ii.
Safety	<ul style="list-style-type: none"> • Safer site for occupants 	Noted.

Table A6iii Summary of matters raised by individuals as to why the New Cross site is not a suitable site and other matters		
Planning Matter	Summary	Officer Response
Flood Risk & water management	<ul style="list-style-type: none"> • Low flood risk / not liable to flooding • Lower risk of pollution to water courses / located away from water courses • 	Noted.
Impact on services and facilities	<ul style="list-style-type: none"> • Good access to local facilities and employment activities • Ideal site area for travelling community with access to confluence areas; transport hubs and local amenities • It has the best space and facilities. • I feel with the source of schools and other facilities it would an ideal site for the traveller to settle. 	Noted.
Loss of community facilities	<ul style="list-style-type: none"> • The loss of community facilities is not significant as there are other sports pitches next to Aldi and the club is not always in use and there is noise and disruption from the existing club / I feel it is suitable as the club is always empty and only open 2 days a week • MUGA could be redeveloped with improved facilities nearby • It is not located on open space / there is no loss of open space • The social club has been hired out every Friday and Saturday night with loud music, disruption, including vandals, fights and as such its loss would not necessarily be negative. 	Noted. See responses to 'loss of social club' and 'loss of multi-use games area (MUGA)' in Table 11.
Biodiversity	<ul style="list-style-type: none"> • This location does not contain any of the borough's open spaces and there would not be a loss of open space. • As tree planting is planned around the site, locating the Travellers site here would increase the amount of greenery in the borough. • It does not have any environmental protections and is therefore a better option • The land is already a building so seems suitable for conversion 	Noted.

Table A6iii Summary of matters raised by individuals as to why the New Cross site <u>is</u> not a suitable site and other matters		
Planning Matter	Summary	Officer Response
Amenity	<ul style="list-style-type: none"> • Is away from housing and water courses where pollution might be an issue 	Noted
Other	<ul style="list-style-type: none"> • The traveller community needs the provision of such sites. • It is important for the council to make provision for our travelling community. 	Noted.

Appendix 7 - Representations received in relation to the potential Pool Court Site.

Please note this appendix summaries comments received from surveys and written responses. Appendix 7 contains three tables as follows:

- 1) **Table A7i:** Summary of representations received from specific and general bodies in relation to the suitability of allocating the Pool Court site as a residential traveller site and development guidelines.
- 2) **Table A7ii:** Summary of matters raised by individuals (travelling and non-travelling travelers, residents, businesses, community groups and landowners) comments indicating the Pool Court site is not a suitable site for allocation as a gypsy and traveller site including comments on proposed development guidelines and other matters.
- 3) **Table A7iii:** Summary of matters raised by individuals (travelling and non-travelling travelers, residents, businesses, community groups and landowners) comments indicating the Pool Court site is a suitable site for allocation as a gypsy and traveller site including comments on proposed development guidelines and other matters.

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
Bellingham Community Project Limited	Does not support this site due to its suitability for 6 pitches and other concerns.	<ul style="list-style-type: none"> • We are a registered charity based at 14a Randlesdown Road and coordinate with the Bellingham Interagency, which works to share information with 60 local agencies which aims to make Bellingham a better place to live. • Bellingham Community Project Limited fully endorses the representation made by Phoenix Community Housing and does not consider that this site is suitable for 6 pitches and has a number of other concerns (please see summary of representation for Phoenix Housing). 	See response to Phoenix Community Housing comments below.

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
Environment Agency	The suitability of the site might be hard to demonstrate.	<ul style="list-style-type: none"> It might be difficult for the applicant to demonstrate that 'highly vulnerable' developments, such as caravan sites, would be safe (in flood risk terms), particularly in the case of the Pool Court site which is undefended and where the available modelling doesn't yet include the new climate change allowances. Site is located within Source Protection Zone 1 for a groundwater abstraction borehole operated for the purpose of public water supply-the operator is Thames Water Utilities Ltd. Risk if the development introduced new pathways for pollution to travel from ground surface level down to the underlying chalk aquifer from which groundwater is abstracted. Careful assessment of both the ground conditions and the expected construction works would be needed to ensure that pollution pathways are not created, such as from the introduction of inappropriate infiltration drainage systems or foundation works such as piling. The site lies within the outline of Flood Zone 3 and Flood Zone 2 at the northern edge of the site. Under the National Planning Policy Framework (NPPF) the site is classified as 'highly vulnerable,' and according to the NPPF development should not be permitted in Flood Zone 3, and should only be permitted in Flood Zone 2 if the exception test is followed. Need to consider the outputs of the EA's River 	<p>Noted. Since the EA submitted its comments, it has released results of recent modelling of the Ravensbourne River for a 1:100-year flood event including 25 and 35% allowances for climate change. Consultants have mapped the likely extent of flooding on the site and officers and consultants have met with the EA.</p> <p>The modelling shows flood water running back from the River along the adjoining railway corridor and extending on to the western part of the potential site by about 5m. EA officers at the meeting considered that there was the reasonable prospect of a traveller site being acceptable from a fluvial flooding point of view, providing that a robust detailed case was made and that adequate mitigation was incorporated. The potential mitigation discussed was as follows:</p> <ul style="list-style-type: none"> Setting back development 8m from the existing river channel, investigating naturalising the southern bank (i.e. removing the concrete wall) and follow guidance in the Council's River Corridor Supplementary Planning Document. Avoiding locating caravans, car parking and hard-standing areas which could be used for storage purposes in the high flood risk western part of the site Incorporating SUDS (e.g. green roofs on permanent buildings) where possible - including devices to control rates of

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<p>Ravensbourne modelling 2015 to ensure that the development can be appropriately assessed in terms of flood risk and the appropriate measures taken within the development to ensure the impact of flooding is minimal.</p> <ul style="list-style-type: none"> • Climate Change allowances set out in the guidance: Flood Risk Assessments: Climate Change Allowances need to be take into account in regard to the potential impact on the development and the associated mitigation measures. River Ravensbourne modelling (2015) does not take into account the increase in new climate change allowances and the onus would be on the applicant to provide an adequate flood risk assessment applying these new climate change allowances • Lewisham SFRA: Dry escape above the 100-year flood level taking into account climate change. • In accordance with this plan, development needs to adopt an integrated approach where land and river uses are considered together. • A setback and an 8m buffer zone should be kept to allow suitable access for heavy machinery to allow essential maintenance and if necessary repair to the river wall acting as a flood defense structure. • Recommend flood resilient measures be incorporated within the development to minimise the impact of flooding on the development. 	<p>discharge in to the River to green field run off rates – when not in flood and consider providing attenuation ponds to provide surface water storage and amenity value</p> <ul style="list-style-type: none"> • Incorporating like-for-like level compensation works if ground levels need raising in some areas; • Safe and dry route to safety • Flood Evacuation Plan. <p>Site-specific guidance contained in the Potential Site Consultation Report already refers to the need to set development back 8m from the River and take account of the River Corridor Improvement Plan. Officers recommend that if this site is chosen the guidance is revised to provide additional guidance on potential mitigation and flood resilient design.</p>

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
Historic England	No objection to the site stated, but matters of conservation are identified.	<ul style="list-style-type: none"> • Potential impact of development on the Culverly Green Conservation Area should be considered. • The site adjacent to it is located within an area of known archaeological potential. It is therefore anticipated that archaeological consideration would be required in the event of a planning application. • Council's heritage specialist should be actively engaged in preparation of the IIA and Gypsy & Traveller Local Plan. • Appears the impact on Conservation Areas not been considered and demonstrated in the IIA. 	<p>Officers consider that a traveller site in this location would have no significant impact on the Culverley Green Conservation Area (which lies to the east of the railway embankment). The Integrated Impact Assessment (October 2017) confirms this view.</p> <p>Archaeological issues would be addressed, where necessary, as part of developing a scheme and submitting a planning application (should this potential site be taken forward).</p>
Housing for Women	No objection to the site stated but concerns have been raised related to the impact on resident living in the area.	<ul style="list-style-type: none"> • We are a charitable organisation providing affordable housing in the area for one of the proposed sites. The housing provided is mainly for women. • Our aim re-settle them back into the community by giving them a sense of purpose, belonging and independence. We support them to sustain their tenancy no matter their life experiences. • We have already received concerns from one of our resident's regarding this proposed site. As an organisation we are concerned on what impact this proposed site will have on our residents living in the area. 	Noted. Officers do not consider that a traveller site raises particular issues for this organisation.
Greater London Authority (GLA)	No objection to this site being allocated.	<ul style="list-style-type: none"> • No objection to this site as its development would not compromise the wider designated nature conservation area. If the site is chosen, any development would need 	Noted. See response to comments from the Environment Agency above.

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		to meet Environment Agency requirements and take account of Lewisham Council's River Improvement Plan and other relevant planning policies.	
Lewisham Police Partnership Team	No objection to the site stated but concerns over safety and integration raised.	<ul style="list-style-type: none"> Recognise the potential for discrimination against the Travelling Community and the sensitivities that the local community may have in both areas shortlisted. Recognise concerns the Lewisham Travelling community representative raised about the current Ilderton Road site; they believe that they may be victims of harassment from the 'Southwark' Travelling community should the New Cross site be chosen. Lewisham would at this stage be more supportive of the Pool Court site. 	Noted.
London Borough of Bexley	No objection to the site stated.	<ul style="list-style-type: none"> Support an approach whereby each local planning authority in the southeast London sub-region seeks to meet its own need. LB Bexley does not have any capacity to provide pitches for Lewisham's identified need in the event that neither of the proposed sites can be delivered. 	Noted. Officers will continue to work with neighbouring local planning authorities as part of fulfilling its Duty to Co-operate obligation.
London Borough of Bromley	No objection to the site stated.	<ul style="list-style-type: none"> Response to the Lewisham Gypsy and Traveller Accommodation Assessment. Para 3.6 - Traveller Definitions: Information from ORS study suggests that only a small proportion of the potential need identified from these households will need new Gypsy and Traveller pitches, and that the majority will need to be addressed through the SHMA. 	<p>Noted. Officers will continue to work with neighbouring local planning authorities as part of fulfilling its Duty to Co-operate obligation.</p> <p>Officers consider that the assessment that there is a lack of need for plots for travelling show people is reasonable and will continue to address wider sub-regional traveller and show</p>

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> • Paras 4.5 and Paras 5.10 - 5.11 - Interviews with Travellers in Bricks & Mortar: Bromley has engaged with the support worker in relation to the needs of travellers with Lewisham connections (family / Lewisham Traveller Group) currently in bricks and mortar accommodation in neighbouring boroughs, who would be interested in pitches in SE London. • The Pitch Needs - “Non-Lewisham” Gypsies and Travellers section deals with travellers with an historical link to Lewisham currently residing in bricks and mortar outside the Borough. It suggests that “The Council should work with neighbouring authorities to consider their accommodation needs”. • Bromley considers the needs of those on its waiting list, provides a realistic understanding of families who have an evidenced desire to locate on Bromley pitches although waiting list application alone is not necessarily proof of need or confirmation that the applicants meet the new definition. Lewisham currently has no authorised sites, however, once Lewisham opens a site/s, a waiting list may attract applications from these families in brick and mortar with links to Lewisham. • Paras 5.12 – 5.14 Travelling Show Persons Accommodation: The zero requirement for Travelling Show people, (from the main 2015 Lewisham GTAA) is determined on the basis that there are currently no yards in Lewisham and the view of a representative of the Showman’s Guild of Great Britain that they would be 	<p>people needs, including the need for transit sites, through Duty to Co-operate discussions with neighbouring boroughs.</p>

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<p>looking at existing yards and surrounding land (presumably in Bromley) as “this would be less onerous than seeking new land for yards.” This is a circular argument with the lack of an allocation (making new yards onerous) being used to justify the zero allocation.</p> <ul style="list-style-type: none"> • Transit Provision: The GTAA does not recommend that Lewisham Council consider any transit provision on the basis that there were “only 18 unauthorised encampments from April 2015 - early 2016. This number of incursions is of a similar order to that experienced by Bromley. Bromley’s Proposed Submission Draft Local Plan (2016) draft Policy 12 indicates that, with regard to transit pitches, “the Council will work with the sub region to secure their provision in an appropriate location within the sub region”. Such work will be undertaken mindful of the numbers of incursions experienced by boroughs and the sub regional provision for Travelling Show people that Bromley already provides. 	
London Borough of Enfield	No objection to the site stated.	<ul style="list-style-type: none"> • Given the physical distance between boroughs, the delivery of new pitches in Lewisham would be unlikely to impact on Enfield. 	Noted.
London Gypsy & Traveller Unit (LGTU)	In principle support of the site, however issues related to access, flooding and ownership must be resolved.	<ul style="list-style-type: none"> • Both proposed site allocations suitable for the accommodation of the 6 pitches needed. However, there are constraints for each of the sites that have to be mitigated and it is therefore too early to choose a preferred option. • A number of issues have to be taken into account, particularly in terms of safe access in and out of the site, given its irregular shape, flood risk mitigation, and site 	<p>Access</p> <p>Officers have met with the London Fire Brigade to discuss issues of safety and emergency access and the need for an emergency pedestrian exit from the potential Pool Court site. At this stage, the Fire Brigade consider that there would be no need for a secondary vehicular access and that a pedestrian-only exit on to Pool Court was desirable, but not</p>

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<p>ownership.</p> <ul style="list-style-type: none"> • There should be a secondary access point through Pool Court for emergency vehicles such as fire engines and ambulances. • Need to ensure the part of the site under Network Rail ownership can be acquired or leased at a convenient rate over a long-term period, as the accommodation provided will be permanent. • Should be a clear agreement on any repairs and maintenance required to the railway embankment, who will be responsible for these and how the process will have minimal disruptions on the site residents. • Should consider the possibility of using one site for permanent accommodation and one for negotiated stopping to direct any Gypsies and Travellers who are on unauthorised encampments while passing through the borough. • The IIA should acknowledge the positive impacts the proposed site allocations would have in addressing some of the inequalities facing the Gypsy and Traveller Community, particularly in terms of health 	<p>essential. Officers would continue to liaise with the Fire Brigade if this site went forward to ensure that detailed design met all relevant guidance and best practice.</p> <p>Flood Risk See response to Environment Agency above.</p> <p>Ownership See response to Network Rail below. On-going maintenance obligations would be considered as part of detailed discussions to acquire the eastern part of the site, should this potential site be taken forward.</p> <p>IIA The updated Integrated Impact Assessment (October 2017) takes account of these and other comments and officers consider that it provides an adequate assessment of the two potential sites.</p>

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
Multimac Surfaces Ltd.	No objection to the site stated, however the suitability of the site for residential purposes was questioned.	<ul style="list-style-type: none"> We are opposite the proposed site at 29 Fordmill Road. We recently enquired into the freehold purchase of the adjoining property which was owned by the national rivers authority, but were deterred from purchasing as they had entered a form of covenant to the title which stated that the area was a flood zone and could never be used for residential purposes. 	Noted. See response to the Environment Agency.
National Grid	No objection to the site stated.	<ul style="list-style-type: none"> National Grid has no comments to make in response to this consultation. 	Noted.
Natural England	Do not support the use of this site and support the provision of an alternative sites.	<ul style="list-style-type: none"> Removal or disconnection of green space corridors is considered an impact to the environment that should be avoided by finding an alternative site. The site is located adjacent to the Pool River and Ravensbourne River junction. This area is identified in Lewisham's River Corridor Improvement Plan. The site is part of the 'River Pool Linear Park site of importance for nature conservation' and is protected by SINC2 in Lewisham Site Allocation Plan. Any works within ten meters of Pool or Ravensbourne Rivers will need an environmental permit. Pool Court site, including any unused portions of the scaffolding site and railway siding should be rehabilitated and included in the Pool River Linear Park as per the Lewisham's River Corridor Improvement Plan. 	<p>Currently the whole site is within the Pool Court Linear Park Site of Importance for Nature Conservation (SINC) (Borough Importance), although the Re-Survey of SINC's 2016 proposes to exclude the scaffolding yard from the designation. Planning Policy CS 12 & Site Allocations Local Plan seek to protect SINC's.</p> <p>Officers anticipate that the ecological value of the potential site would be relatively limited due to the dominance of Japanese knotweed across the Council owned land. Overall, officers consider that a carefully designed scheme that eradicates knotweed, responds positively to the river, retains/mitigates the loss of existing valuable trees and any protected species issues would be acceptable.</p> <p>Site-specific development guidance contained in the Potential Site Consultation Report already calls for careful treatment next to the River,</p>

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> If development were to be planned for this site, significant contributions to neighbouring green space and on-site Green Infrastructure would need to be included. 	retention of trees where possible and careful lighting. This could be strengthened if this potential site went forward.
Network Rail	The site is unsuitable for allocation	<p>Site contains a large area of land owned by Network Rail. The section of land known as 'Land off Fordmill Road, Bellingham' which is located within the Pool Court site forms part of the DfT remit.</p> <p>Parts of the site are also located adjacent to Network Rail's ownership boundary and operational infrastructure.</p> <p>Network Rail has freeholder ownership of the site which is currently leased to R.H. Scaffolding. The lease is protected by the Landlord and Tenant Acts, compensation would be due to the tenant if the lease was terminated and the lease can only be terminated under certain conditions, the landlord wishing to redevelop the site being one of these.</p> <p>Network Rail object to the proposed Gypsy and Traveller designation at Land at Pool Court, Catford.</p> <p>The use of the Land off Fordmill Road site as a Gypsy and Traveller site would not maximise the development potential of the site in relation to delivering residential units to meet DfT and Lewisham Council housing targets and in generating funds to reinvest into the railway.</p> <p>We feel the site is unsuitable for the above allocation due to:</p> <ul style="list-style-type: none"> Network Rail is not willing to sell the property to the 	The Council owns the western part of the potential site, but not a sliver of land between the site and the Ravensbourne River. Network Rail owns this sliver of land and also the eastern part of the potential site, which is partly occupied by a scaffolding yard which has a lease expiring in 2020. Officers have held discussions with Network Rail over the possibility of purchasing its interest in this land. Network Rail is currently undertaking a portfolio sale of its commercial estate. However, in August 2017, in response to a letter from the Mayor, Network Rail confirmed that owing to the requirement to produce a definitive portfolio of assets for the marketing and potential disposal of its commercial estate, it is no longer able to consider offers for the sale of the eastern part of the potential site. On this basis, the Council would need to discuss purchase with the new owner of the land. Officers understand that Network Rail is hoping to dispose of its commercial estate in June 2018.

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Consultee	Site Suitability	Summary of representation	Officer Response
		<p>Council for the above purpose and LB Lewisham would need to use CPO powers to acquire the property. Network Rail will pursue maximum value in any disposal process.</p> <ul style="list-style-type: none"> • The property is currently included in a wider disposal package which is currently undergoing a lengthy and complex disposal process. LB Lewisham will potentially need to deal with a new land owner. • The property is currently leased to a tenant and compensation would be due to the tenant if the lease was terminated. • The question of using part of the property as a Gypsy / Traveller site was raised; Network Rail is unenthusiastic due to the adverse impact this would have on the value of the remainder of the property. • The second potential site, 'New Cross Social Club and adjoining land', is owned by the LB Lewisham which we believe makes it a more appropriate site. <p>2) Network Rail would be keen to work with LB Lewisham in order to bring forward the Network Rail owned land at Pool Court and adjacent LB Lewisham owned vacant land for residential development. As you are aware, this site extends to approx. 0.3ha and could accommodate a significant number of residential units, with potential for affordable housing provision as part of any development.</p> <p>3) Unfortunately, due to the stage Network Rail is at with the aforementioned disposal process, we need to make a decision on whether to pull the property out of the disposal package in the very near future. The only justification to remove the property from the disposal package would be its</p>	

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Consultee	Site Suitability	Summary of representation	Officer Response
		potential as a development site - in terms of assisting Network Rail in meeting our housing provision targets and the higher value of the property as development land.	
New Cross Gate Trust	Object to the site suitability on conservation grounds.	<ul style="list-style-type: none"> Unfamiliar with site. But it has a conservation order on it and therefore should not be considered suitable either 	There is no 'conservation order' in place. See response to Natural England above.
NHS Lewisham Clinical Commissioning Group	No objection stated.	<ul style="list-style-type: none"> Lewisham CCG feel that the impact on health services in the area would be minimal. 	Noted.
Outreach service for Gypsy and Roma Travellers, Lewisham Irish Community Centre	No objection to the site stated, however issues including ownership, flood risk and access were identified.	<ul style="list-style-type: none"> Both proposed site locations appear to be of a suitable size to accommodate the 6 pitches needed. There are advantages and disadvantages to each of the proposed site locations. Very few of the travellers currently living in Lewisham are living in and around New Cross, which is a very built up, and is close to an area of regeneration area in the adjoining borough. This regeneration programme is liable to increase population density, making the area less suitable for a traveller site. There are also two existing Traveller sites run by Southwark Council very close to Lewisham's proposed New Cross site. Most traveling families connected to Lewisham are living in and around the south of the borough, close to the Bromley border, and tend to return to this part of the borough between periods of travelling. 	<p>Noted.</p> <p>Access See response to London & Gypsy Traveller Unit above.</p> <p>Flood Risk See response to the Environment Agency above.</p> <p>Ownership See response to London Gypsy & Traveller Unit above.</p> <p>Negotiated Stopping Place The Gypsy and Traveller Accommodation Assessment Update (August 2016) notes that there is the possibility that changes to the definition of 'gypsy and traveller' that took place</p>

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> • The south of the borough has lower rise buildings and accommodation which create a more suitable environment for the community. • In the south of the Borough there are facilities, shops and services where the community is known and accepted and schools which have accrued experience in working with young people from the Traveller communities. Family ties and networks are stronger in the south of the borough than they are in New Cross. • To accommodate only 6 tenants/licenseses from the community at New Cross while the rest of the community remains south of the borough is likely to fragment the community cause isolation for families as extended families would be split. • Access in and out of the site is a concern, given its irregular shape. Some homes might need to be located along the long 'arm' of the site, which could be dangerous for pedestrians & children. • A secondary access point through Pool Court would resolve this problem, obviate the need for a turning circle in the triangular part of the site and allow excellent access for emergency vehicles such as fire engines and ambulances. • There is a possible flood risk, including that from potential 'run-off' from the railway embankment. • Importantly, the council needs to ensure that the part of 	<p>in 2015 could result in increased levels of travelling but it is not recommended that there is a need for the Council to consider any transit provision at this time.</p> <p>The Council and the Metropolitan Police have developed a joint policy and protocol for unauthorised encampments and officers do not consider that there is the need for a transit site or a negotiated stopping place.</p> <p>IIA See response to Gypsy & Traveller Unit above.</p>

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<p>the site currently under Network Rail ownership can be acquired or leased at an affordable rate over in the long term, as the site accommodation provided will be permanent.</p> <ul style="list-style-type: none"> • There should be a clear agreement on any repairs and maintenance required to the railway embankment (which would remain in Network Rail ownership), including who will be responsible for these and how any repairs would cause minimal disruption to site and existing residents. • As there has been an increase in the number of unauthorised encampments in the borough in the last two years, it would be wise for the council to consider the possibility of using one of the identified locations for permanent accommodation and the other one as a negotiated stopping place. This would allow the CRT or police to direct any Gypsies and Travellers who stop on unauthorised encampments in the borough to a legal and safe temporary stopping place. • Should acknowledge the positive impacts the two proposed site allocations would have in addressing some of the inequalities facing the Gypsy and Traveller community, particularly in terms of health. 	
Phoenix Community Housing Association	Phoenix does not consider that this site is suitable for 6 pitches and has a number of other concerns.	<ul style="list-style-type: none"> • Phoenix does not consider that this site is suitable for 6 pitches and has a number of other concerns. • The ownership of the land could hamper development of the site. The land at Pool Court is partly owned by the Council and partly owned by Network Rail. There is also a 	<p>Ownership See response to Network Rail above.</p> <p>Safety, public space & play space: Officers consider that a safe and attractive traveller site could be provided here – including</p>

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Consultee	Site Suitability	Summary of representation	Officer Response
		<p>scaffolding yard operating a business on the land owned by Network Rail and an area designated as a Site of Importance for Nature Conservation.</p> <ul style="list-style-type: none"> We are concerned that building a community, which is likely to include children, and placing it on a narrow strip of land in a potentially unsafe, flood area between a river and a railway line presents risks that are not easily mitigated. The location of the site and physical constraints mean there is limited access to public space. The size combined with the shape of the site could limit turning and mobility within in the site both for the actual pitches as well as other vehicles. The shape of the site and single point of access at Fordmill Road further limits safe vehicular access for the community, visitors and emergency vehicles, which could be disruptive to both the new community and residents in the local area. The size of the pitch could also limit the provision of amenity space on the site such as landscaping, play area and or communal space. In addition, the shape and location of the site, (a narrow strip adjacent to a river and railway line), seems to provide little opportunity for physical integration with the local community. 	<p>areas of open space and shared space suitable for play. See response to Environment Agency above in relation to flooding.</p> <p>Access The Highway and Access Feasibility Report (October 2016) tested vehicular access and 'swept path analysis' (vehicle turning space requirements) for an 18.5m lorry (which is bigger than a fire engine) for three scenarios: (1) In and out via scaffolding yard, (2) In and out via Pool Court and (3) In from Scaffolding yard and out from Pool Court.</p> <p>All scenarios allow for a lorry to enter and leave in forward gear but take up different amounts of the site. The Potential Sites Consultation Report incorporates Scenario 1, on the basis that an in and out single access from Fordmill Road is preferable to traveller site traffic using Pool Court to exit a site. Officers consider that likely levels of traffic mean that family-sized pitches would be acceptable. Such an approach should not be unduly disruptive for people living on a site and should cause inconvenience for users of Fordmill Road or existing local residents.</p> <p>Nature Conservation See response to Natural England above.</p> <p>Environment Agency Appraisal See response to Environment Agency above.</p>

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> • Presence of other communities in the vicinity at Beatrice House (that consists of 73 flats in blocks offering sheltered housing for elderly residents) and McMillan House which offers safe accommodation for women. • We are concerned that if this site is selected there will be an even higher density of people with specific needs and different needs located in one area. • The proposed site is a Site of Importance for Nature Conservation. We are concerned that any re-designation of the site could have a negative impact on the biodiversity value of neighbouring sites which support protected or priority habitats of species. • Recommend that the Environmental Agency sustainability appraisal (with respect to flood risk) is completed before a decision is made on the site. • Would like to know the response rate from the local community and local service providers. Our experience is many hard to reach groups respond best to door knocking and one to one contact rather than public meetings. • Unclear from the supporting documents what provision would be for utilities and waste management at the proposed site. 	<p>Any planning application for a traveller site here would need to be supported by a detailed Flood Risk Assessment.</p> <p>Response Rate See summary in the body of this Statement.</p> <p>Utilities & Waste Management Issue would be addressed as part of any detailed design.</p>
RHS Site Services Ltd.	Does not support the site due to loss of an operational business.	<ul style="list-style-type: none"> • Small local firm been in the yard at Fordmill Road London SE6 3JL since 2007. • Have serviced all the local builders and residents with all 	Core Strategy Policy 5 and DM Policy 11 seek to protect the scattering of employment locations throughout the borough outside of designated employment locations. However,

Table A7i: Summary of representations received from specific and general bodies (Pool Court)			
Consultee	Site Suitability	Summary of representation	Officer Response
		<p>their scaffolding and small building needs and have trained many young people that live in Lewisham. If this was taken away from Lewisham this would be a big loss especially to the Bellingham estate.</p> <ul style="list-style-type: none"> • I would like to have the opportunity to meet with you at The Yard at Fordmill Road SE6 3JL to explain why the yard needs to stay as it is. 	<p>officers consider that facilitating the provision of a traveller site could represent special circumstances that justify this loss. If this site went forward, officers would consider what re-location assistance the Council would be able to offer.</p>
Southern Gas Network	No objection stated.	<ul style="list-style-type: none"> • Presence of various large diameter gas mains within the access area to both of the planned sites. The large diameter gas mains are located in the public highway. • These mains are 630mm / 48" in diameter and access to our plant would be needed 24/7m. Any impingement to our plant could cause us severe operational issues to our gas distribution network. • From safety point of view any bonfires, near our plant would be of concern. 	<p>Noted – these issues could be included in site-specific Development Guidelines if this potential site was taken forward.</p>
The Wheelshunters Club	No objection to this site stated.	<ul style="list-style-type: none"> • Feel that this site would be better and its selection would enable the Wheelshunters Club to continue to serve the community. 	<p>Noted.</p>
Thames Water	No objection stated.	<ul style="list-style-type: none"> • For Thames Water to comment on the sewerage requirements of the sites being considered and the impact on existing systems an indication of the location and number of pitches proposed, would be necessary. However, in very general terms for the small number of new units proposed Thames Water don't expect any major concerns. 	<p>Noted – these issues could be included in site-specific Development Guidelines if this potential site was taken forward.</p>

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Consultee	Site Suitability	Summary of representation	Officer Response
		<ul style="list-style-type: none"> In the absence of sewers within the vicinity, the developer of the accommodation will be required to make provision for wastewater services either, after consultation with Thames Water, lay a sewer (at his/her own expense) from the site to an appropriate and agreed connection point on the public sewerage network and offer this for adoption or make some form of onsite provision to the disposal of wastewater, septic tank for example. 	
Transport for London (TFL)	No objection stated.	<ul style="list-style-type: none"> This site does not raise any strategic transport issues 	Noted.

Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Site size/capacity	<ul style="list-style-type: none"> The site is not suitable for the development of 6 pitches. The average pitch size suggested (400m) is the smallest end of the recommended density rating according to the London Gypsy and Traveller Unit. The site is too small to accommodate roads, turning etc. Does the site allow for hard standing for a static caravan, touring caravan and a parking space, plus single storey amenity, some landscaping / open space and a play area? The site should be used to house homeless people and at a higher density to accommodate more people. The Council is proposing six pitches, but traveler communities are known to illegally enlarge. 	<p>The Masterplan Capacity Study demonstrates that the site could satisfactorily accommodate at least 6 pitches in accordance with the draft development guidelines in the Potential Sites Report (including a single in-out vehicular access from Fordmill Road and pitches set back 8m from the River) and also taking account of subsequent advice from the Environment Agency to pull pitches away from the western boundary.</p> <p>Officers have begun investigating the possibility of further rationalising the potential site so include part of the existing hammer head vehicular-turning area at the northern end of Pool Court.</p>

Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Location	<ul style="list-style-type: none"> The potential site is unsuitable because it is currently a Conservation Area (Culverley Green) A traveler site in this location is not the way forward for the regeneration of Catford which the Council have been discussing for a long time. Overcrowding is already an issue in Catford. 	Officers do not consider that a traveller site would have any significant adverse effects on the Culverley Green Conservation Area (which lies to the east of the railway embankment).
Suitability for residential use	<ul style="list-style-type: none"> Land is more suited to a scaffolding yard than housing. The environment is not safe for residential use due to proximity to river, the railway line and flood based risks. It would be better used as allotments or a community garden The loss of designated open space would be negative for the local community The site is designated Site of Importance for Nature Conservation (SINC). Pool River Walk is valued by local residents and shouldn't be built on. 	<p>The potential site has been identified as 'Good' for four of the relevant Site Selection Criteria, 'Average' for four and 'Excellent' for one and officers consider that it is suitable. The draft Masterplan Capacity study demonstrates that the potential site could accommodate at least six traveler pitches.</p> <p>Whilst existing and potential alternative use is relevant, there is pressing need to provide a traveller site.</p>
Highways, access and accessibility	<ul style="list-style-type: none"> The site does not appear to meet approved criteria for safe vehicular access or be capable of safe vehicular access for 15m long caravans and turning The site does not appear to be capable of safe access for emergency vehicles The site has poor public transport connections The site will worsen levels of existing traffic congestion on the south circular and Fordmill Road where traffic associated with nearby school converges / The Canadian Avenue/Bromley Road/Fordmill Road area already suffers from excess traffic and regular queues - additional traffic to and from this site would only exacerbate that. The main entrance will be in Fordmill road which is a very busy road with big lorries going to the warehouse with goods all day 15 m x 3m caravans would have an impact on highway safety for 	<p>The Highway and Access Feasibility Report (October 2016) tested vehicular access and 'swept path analysis' (vehicle turning space requirements) for an 18.5m lorry (which is bigger than a fire engine) for three scenarios: (1) In and out via scaffolding yard, (2) In and out via Pool Court and (3) In from Scaffolding yard and out from Pool Court.</p> <p>All scenarios allow for a lorry to enter and leave in forward gear but take up different amounts of the site. The Potential Sites Consultation Report incorporates Scenario 1, on the basis that an in and out single access from Fordmill Road is preferable to traveller site traffic using Pool Court to exit a site. Officers consider that likely levels of traffic mean that family-sized pitches would be acceptable. Such an approach should not be unduly</p>

Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<p>children walking to school and cause delays for bus routes on Fordmill Road and buildup of other traffic</p> <ul style="list-style-type: none"> • The position of the exit to the site on Fordmill Road would necessitate further parking restrictions to improve sightlines from the site entrance. This would worsen existing on street parking issues for local residents • Large vehicles including emergency vehicles can't travel along the road because of people parking on the unrestricted side of the road. Concern there would be overspill from the proposed site that would increase the problem. • There is only one access/exit route whilst the New Cross site has two. • The positioning of the exit to the camp would require further restriction to parking in this area and make parking for residents even more difficult. 	<p>disruptive for people living on a site and should cause inconvenience for users of Fordmill Road or existing local residents.</p>
Ownership & Delivery	<ul style="list-style-type: none"> • Delivery of the site is constrained by landownership as the site is part owned by network rail and part owned by the Council. • Land is not available right now due to landownership constraints and the Council stipulated that the proposed land be Council owned. • Network Rail land should only be purchased if it will benefit the whole community. • It is uncertain Council will be able to purchase Network Rail Land • The negative impact of costs associated with purchasing land from Network Rail, undertaking further Environmental Impact Assessment work loss and /or relocation of existing operational business • The cost of delivering a site for a small number in light of wider cuts 	<p>See response to Network Rail in Table A7ii.</p> <p>Concerns about affordability noted.</p>
Loss of operational business	<ul style="list-style-type: none"> • The re-development of the site for gypsy and traveller accommodation would result in the loss of an operational business, the scaffolding yard and the Council supports successful businesses. • There would be fewer local employment opportunities • Potential disruption to nearby businesses 	<p>See responses to RHS Site Services Ltd in Table A7ii. Officers do not consider that a residential traveler site would disrupt nearby businesses.</p>

Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Biodiversity	<ul style="list-style-type: none"> • The site is a Site of Importance for Nature Conservation (SINC). Environment Agency good practice states the gypsy and traveller sites should not have a negative impact on biodiversity value. • Would result in a negative effect on landscape as mature trees and undergrowth provide a tranquil vista to residents • Proposals will result in loss of habitat as the site is part of a wildlife corridor and surrounding wildlife must be protected. • The proposal is inconsistent with the aims of the Lewisham's River Corridor Improvement Plan that the biodiversity and landscape of the Linear Park should be protected and enhanced. • There will be a risk of predation to existing wildlife from dogs kept on site • The site would increase the risk of chemical and light pollution impacting on nearby animals and plants. • Loss of SINC and wilderness space, precious in inner city borough and help to reduce pollution, heavy in Catford because of south circular and frequent slow-moving traffic entering area nearby, on approach to Catford Centre. • Needs more robust measures to ensure the development and subsequent occupation of the site maintains the environmental importance of the area • As the site is not accessible to the public it has remained a sanctuary to wildlife and provides a habitat to newts, toads, squirrels and foxes. There are a number of larger bird species including woodpeckers, warblers, greenfinches, chaffinches, magpies and parrots that nest in the trees 	See responses to the Environment Agency and Natural England in Table A7ii.

Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
Flood Risk, Water Management & River Pool Management	<ul style="list-style-type: none"> • There is a flood risk associated with this site • The site is liable to flooding • Think the council is underestimating the flood risk-maybe not that the site will fill out flood, but that it is waterlogged in winter • Updated flood modelling for the area needs to take place. It should offer allowances for any potential impacts of climate change which indicate future flood impact. • The existing undeveloped site provides a pervious surface for water to drain away. Increasing paved surfaces will increase surface water run-off. • Unsuitable due to the fact that the area is currently designated as part of the river pool linear park and is protected. • The allocation would create a risk of pollution and waste overspill into the river and surrounding areas / Risk of contamination (river) from dumping rubbish and human waste. • At present the undeveloped land acts as a soak away from rainwater. Further hardscaping of land will move the risk of localised flooding to neighbouring properties. Work to reduce the risk of flooding to the site would only push flood water to other areas nearby, whilst potentially damaging the River Pool Park • The river pathway between Catford and Bell Green is already lonely and I would not walk along there if I knew I was near a travellers' camp 	See response to the Environment Agency in Table 13.
Physical and social integration	<ul style="list-style-type: none"> • Due to the site being bounded by the river and railway line as well as the shape, the site does not allow for physical integration with the local community. • The site has limited access to local amenities including a doctor's surgery and shops • The adjacent residential uses at Beatrice House and McMillian House offer residential accommodation for elderly residents and safe housing for women. Introducing another vulnerable group, gypsies and 	<p>The site would be self-contained, but not hidden from the surrounding settled community.</p> <p>If this site were chosen, the Council and its partners would need to strengthen their efforts to increase the capacity and resilience of local communities. In addition, officers recommend that the Outreach Worker facilitates meetings between local residents and members of the Lewisham traveller community to build</p>

Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<p>travellers, raises concerns.</p> <ul style="list-style-type: none"> • Have the Council assessed any potential impact on Pool Court residents as a vulnerable group? • The allocation is going to detract people from moving into the area, including families. • If crime and antisocial behaviour increases in the area, that would be bad for the whole local community • I would like to know how the travelling community plan to integrate into the community in terms of contributing to community welfare and resources. 	<p>understanding and community cohesion during the detailed design, planning stages and beyond.</p>
Impact on area of deprivation	<ul style="list-style-type: none"> • Best practice suggests traveller sites should not be built in socially deprived areas to allow for better integration. Bellingham ward has some of the highest levels of social deprivation in the borough. • The proposal will not improve the area and will bring more poverty to Bellingham • Buying land from Network Rail for a small handful of people would be a complete waste of money for Lewisham residents, and would raise serious questions about the council's ability to provide services for all, with monies raised from residents. • Too close to vulnerable old people • Why bring more poverty into our area? Maybe a more affluent area would cope better. 	<p>The English Indices of Deprivation 2015 measures multiple deprivation at the small area level across the country based on a number of issues including income, education, health, barriers to housing and services. Bellingham (which includes the potential Pool Court site) is the third most deprived Ward in Lewisham and is within the 20% most deprived neighbourhoods (Lower Layer Super Output Areas) in the country.</p> <p>See response above in relation to integration.</p>
Service and infrastructure constraints	<ul style="list-style-type: none"> • Health, education, access to employment and other services in this location are already operating under under pressure. Will there be consultation with healthcare providers and schools in this area as part of the process? • Natural Environment Research Council (NERC) specifies that Gypsy and Traveller Site should be located in locations with good access to open space. This location does not comply. • The site is isolated and residents would have to go to Bellingham for the supermarket or more likely all the way to Catford. 	<p>The traveller community does have particular needs around education and health and faces particular challenges in accessing health, education and other services. Officers have engaged with the Council's School Places Manager and NHS Lewisham Clinical Commissioning Group (CCG) at all stages of the process. The CCG has responded to the latest consultation stating that it considers that the impact on health services would be minimal for either site.</p>

Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
		Officers do not envisage that the population generated by the provision of a site (circa 20-25 people) would add undue pressure on local infrastructure or services. However, it is recommended that liaison takes place with local schools and GP surgeries once a preferred site is known to enable them to make any adjustments to service provision that may be necessary in advance of a site being first occupied.
Safety	<ul style="list-style-type: none"> • Fear of intimidation and discomfort walking past this site and living in close proximity to the site • It is a safe place for the elderly and if there was a Gypsy and Travellers site very near, old and vulnerable residents would be very frightened • Fear of theft and risk of antisocial behaviour • Danger to life and fear for safety of children linked to the proximity to the adjoining railway land and river • Provision of a single emergency access point is required. • Feeling on existing safety is low and people are already afraid to walk around. Existing issues could be made worse. • There are negative perceptions of the gypsy and traveller community 	<p>Access to adjoining railways would be secured and officers consider that detailed design should ensure a safe environment for children living on a site.</p> <p>The Potential Sites Consultation Report identifies the need for a Site Management Plan and this could satisfactorily manage the way the site is used.</p> <p>See response above in relation to Access & Accessibility.</p> <p>Officers have met with the London Fire Brigade to discuss issues of safety and emergency access and the need for an emergency pedestrian exit from the potential Pool Court site. At this stage, the Fire Brigade considered that that there would be no need for a secondary vehicular access a pedestrian-only exit on to Pool Court was desirable, but not essential. Officers would continue to liaise with the Fire Brigade if this site went forward to ensure that detailed design met the all relevant guidance and best practice.</p>
Amenity & Environmental Quality	<ul style="list-style-type: none"> • New users of the site would create noise and disturbance • The noise absorption from the railway afforded by trees and bushes will be lost and will impact on residents both in Pool Court and Fordmill Road • Noise from the trains isn't going to be pleasant for the residents especially as Southern have said they are finally going to increase the 	<p>Officers consider that the site could provide a high-quality environment for the traveler community.</p> <p>The Council's Environmental Protection Team has highlighted the need to consider noise from neighbouring railway lines, but raised no objection in principle to residential use of the site. Caravans</p>

Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<p>trains on the Catford loop.</p> <ul style="list-style-type: none"> • Poor sunlight, daylight and artificial lighting • Potential subsidence • Concerned about the dumping of rubbish by the gypsy group • Fly tipping is an existing problem and this problem may increase if people could feel they could blame the gypsy and traveller community. Will there be strict rules to guide waste disposal? Strangers come and dump their rubbish and the Housing Association cleared them. As a result, residents are affected by the rent increase • By bringing the traveller community to this area I believe it will make the area more unsightly. • There is already considerable light pollution. On-site external lighting should not cause disturbance to nearby residents or harm the biodiversity value of the site or adjoining land • An area dedicated to parking large caravans, smaller caravans and cars with the purpose of people residing in the area will have an ugly appearance as a visual amenity to the local area 	<p>are generally not well insulated against noise and the layout, orientation and design of pitches and associated structures would need to take account of this. If this site was chosen, it is recommended that the site-specific guidance is amended to reflect this and to refer to the need for a solid fence of appropriate mass/sound reduction qualities to be installed along the western boundary.</p>
Other	<ul style="list-style-type: none"> • We have so many more important problems that are being ignored. • The Council should not be diverting resources to this when there are so many cuts going on • More information on the plan for residents would be beneficial for example, how do you plan to advertise to travellers? Will the site be open to the residence in the local area which are currently facing a housing shortage? Will there be permanent buildings on the site? There is a good example of how one should work at South Bermondsey Station. • More could have been done to inform residents about this process by writing to the houses in Fordmill Road next to, opposite the site and within Pool Court. I would also like assurance that the Council will keep residents well informed about the outcome of the review of the two proposed sites and about the next steps in what is a complex and lengthy process. 	<ul style="list-style-type: none"> • Noted. • Noted. • Officers have started to prepare a Pitch Allocation Scheme to establish a fair, transparent and equitable system for the allocation of pitches, with eligibility being based on the ability to demonstrate a 'local connection' with Lewisham. The intention is to consult on a draft Scheme once a preferred site has been identified. • The Potential Sites Consultation Report requires the submission of a Site Management Plan to accompany a planning application. An approved Plan for a site will be an important tool to ensuring a well-run site, establishing a flood evacuation plan and managing potential anti-social behaviour (such as burning off material). • Consultation can always be better. However, officers consider

Table A7ii Summary of matters raised by individuals as to why the Pool Court site is <u>not</u> a suitable site and other matters		
Planning Matter	Summary of representation: site suitability and comments of development guidelines	Officer Response
	<ul style="list-style-type: none"> • The draft plans appear to be fine on paper, but in reality, how will monitor this to ensure travellers adhere to these? • Many companies such as 'Park Home Living' provide the lifestyle to live in a permanent mobile home for those that choose to do so. • Adjacent sites will lose value. 	<p>that high quality consultation took place in accordance with the relevant regulations and Council's Statement of Community Involvement.</p> <ul style="list-style-type: none"> • Property values are not a material planning consideration.

Table A7iii Summary of matters raised by individuals as to why the Pool Court site <u>is</u> not a suitable site and other matters		
Planning Matter	Summary	Officer Response
Size & Capacity	<ul style="list-style-type: none"> • There is more room around this site / it is a good size • The site is larger and the pitches will be larger • It can accommodate more travelers / pitches • The site could potentially fit more pitches on the site • Traveller families also have larger families than average so need large sites wherever possible (Pool Ct: 500sqm vs New Cross 400sqm) 	Noted.
Location	<ul style="list-style-type: none"> • Traveller families who should not be forced to live in a very limited geographical area. It makes it more difficult to house families separately for example if there was a domestic violence or intimidation issue. This is in contrast to other social housing tenants who could request to be moved to a different area. • Future development of the Catford site will be restricted by its nature reserve type setting, and its use therefore for single storey light-touch traveller accommodation is appropriate • If pitches are not provided, Gypsies will end up unlawfully occupying land around the borough which has not been identified or authorised for residential use from the Council. • The location of the traveller site at Pool Court will have far less of an impact on the lives of residents within the borough 	Noted.

Highways, Access and Accessibility	<ul style="list-style-type: none"> No new road entry points will be needed to be constructed, so there should be minimal impact on existing residents on Fordmill road. 	Noted.
Ownership & Delivery	No relevant comments.	n/a
Suitability for residential use	<ul style="list-style-type: none"> Not much of the land is in use The scaffolding yard could easily relocate and this will be cheaper than replacing community facilities. The site has less housing potential than the New Cross site. 	Noted. See response to RHS Site Services in Table A7ii.
Loss of operational business	<ul style="list-style-type: none"> A new location for the scaffolding business is important as it brings jobs to the area. Supporting a business to relocate is also a significantly simpler and cheaper undertaking for a council than providing replacement community facilities. 	See response to RHS Site Services Ltd. In Table A7ii.
Biodiversity	<ul style="list-style-type: none"> The biodiversity can be managed well 	Noted – see response to Natural England in Table A7ii.
Flood Risk & Water Management	<ul style="list-style-type: none"> The flood risk can be managed well Enhancement of the river area will be critical to the success of the scheme as well as the management and maintenance of this area while the site is in occupation. 	Noted – see response to the Environment Agency in Table A7ii.
Physical and social integration	<ul style="list-style-type: none"> The development of the site would affect fewer people This land is not used by the community and this solution that would not harm the community in the way that the Social Club solution would. The site is closer to family [of known gypsies and travellers] who live Downham and Catford. We need to stay close together to support each other. Familiar with the surrounding area including shops and doctors. The site would provide a more welcoming environment for potential travelers, in a more welcoming area. 	Noted.
Impact on area of Deprivation	<ul style="list-style-type: none"> More sunlight / daylight Greater privacy. It is not located close to other flats. More space 	Noted.

Service & Infrastructure Constraints	<ul style="list-style-type: none"> • In close proximity to local amenities including green space. • Links to the community and facilities, especially next to green space of Bellingham Park Play for the children. • More open space nearby for recreation including for any travellers with horses. • Suitable as not infringing on existing community services and provision. 	Noted.
Safety	<ul style="list-style-type: none"> • The site is a safer environment • It is important that all local authorities provide a safe suitable space for families to live with dignity 	Noted.
Amenity & Environmental Quality	<ul style="list-style-type: none"> • Pool Court has a lower population density in the surrounding areas which means adjacent buildings are 2 storey (vs 4 storey at Hornshay) so the sites won't be overlooked. • What measures are going to be put in place to ensure contamination of this land and environmental resource does not take place? • Sounds well planned and I think it would improve the area. 	<ul style="list-style-type: none"> • Noted. • Contamination issues would be addressed at detailed design stage if this site went forward. • Noted.
Other	<ul style="list-style-type: none"> • It is important for the council to make provision for our travelling community • It would be good to have more information on the plan for residents. For example: Will the site be open to the residence in the local area which are currently facing a housing shortage 	<ul style="list-style-type: none"> • Noted. • Officers have started to prepare a Pitch Allocation Scheme to establish a fair, transparent and equitable system for the allocation of pitches, with eligibility being based on the ability to demonstrate a 'local connection' with Lewisham. The intention is to consult on a draft Scheme once a preferred site has been identified. • The Potential Sites Consultation Report requires the submission of a Site Management Plan to accompany a planning application. An approved Plan for a site will be an important tool to ensuring a well-run site, establishing a flood evacuation plan and managing potential anti-social behaviour (such as burning off material).

Appendix 8: Shontelle Williams Report

Appendix 9: Petitions

(1) Lovelinch Close (opposing New Cross site)

Petition signed by 315 people was submitted at the Council meeting on 23 November 2016.

The petition states:

“The planned site will adversely affect our local infrastructure and our community will struggle even further to supply the needs of residents, particularly our younger residents, with safe areas to play, socialise and channel their energies positively. The proposed plan is to demolish the multi-use games area and social hall/bar – both of which play an integral part for our residents and will greatly affect the future wellbeing of our community. In a climate where murder, crime and a lack of opportunities are already soaring at an alarming rate within our community, we believe that the proposal of a Traveller Site is disproportionately weighted against Lovelinch Close and our neighbours.”

Summary of main issues raised:

- Adverse effect on local infrastructure and the community will struggle even further to supply the needs of residents, particular younger residents with safe areas to play, socialise and channel their energies positively.
- The multi-use games area and social hall/bar – both play an integral part for residents and their demolition will greatly affect the future wellbeing of the community.
- Murder, crime and a lack of opportunities are already soaring at an alarming rate within the community, and the proposal for a Traveller site is disproportionately weighted.

The petition is accompanied by comments from individual people that raised the following issues (numbers in brackets = frequency of issue being raised)

- Effect on facilities for young people (51)
- Effect on community facilities, including the loss of the social club (18)
- Perceptions of travelling community (12)
- Impact on a community already experiencing high levels of crime and other problems (10)
- Investment is needed for the existing local community / the proposal will not benefit the estate (9)
- Site alternatives (4)
- Views on accommodation needs for travelling community (3)
- The number of existing traveller sites in the area (2)
- Number of people in the area already (2)
- Potential impact on property value (1)
- Use of taxpayers' money (1)

(2) Wheelshunters Club (opposing New Cross site)

The petition signed by 61 people states:

“We the undersigned as members and supporters of the Wheelshunters Club SE15 1HB. We have read the attached statement and agree with it wholeheartedly”

Summary of main issues raised:

- Loss of a family-friendly meeting space and services for the local community, including (social club members, faith groups, travelling community, older people and young people)
- Loss of jobs and housing for existing employees and caretaker.
- The number of existing traveller sites in the area
- The Catford site would be better so that the club can continue to service its community

(3) Pool Court Petition (opposing Pool Court site)

Petition signed by 57 people.

“Dear Neighbours/friends - Last month, you may have seen an advert posted on the lamppost from the Local Authority – Lewisham Gypsy and Traveller – stated that Pool Court is a potential location for at least six permanent pitches. They want to buy the scaffolding under the bridge to access the land at the back. By adding your name below, you are expressing your support and to confirm that you will be adversely affected by this plan”

Summary of main issues raised:

The petition itself simply states that residents will be adversely affected (no specific issues identified). However, it is attached to letter from a resident at Sybil Phoenix House, indicating that it is written on behalf of residents in Pool Court. The letter raises the following issues:

- Residents of Pool Court will be impacted by the proposed change.
- Using the green belt of land between the river and Pool Court as housing. The riverbank is invaluable in improving their lifestyles and only local recreation land near their location.
- The land currently serves as a buffer to reduce the occurrence of flooding for properties 7 through 24.
- The proposal doesn't meet components of the Government's Good Practice Guide: Designing Gypsy and Traveller Sites (2008) and the Government's Planning Policy for Traveller Sites (2012).
 - Site location/selection: perceptions of the traveller community, noise and disturbance
 - Site layout, access and orientation: flood risk, green belt designations, visual and acoustic privacy, social integration, potential road safety risks, access for emergency vehicles, security including vandalism, fly-tipping and unauthorised caravans.
 - Site services and facilities: management of pets including dangerous dogs.
 - Consultation with gypsies and travellers and consideration of proximity to a network of local family support.
 - Consultation with the settled community

- Potential service charge increases at Pool Court.
- Potential increase in insurance premiums.
- Potential effect on walking in the street at night.

Appendix 10 – Representations received from Councillors

Respondent's name	Comment	Officer Response
Councillor Brenda Dacres	<p>Neither areas are suitable. The area in New Cross particularly so. This area of the borough which already feels forgotten and lacking in facilities. There are innate issues with the area and this will compound those views by removing what little facilities they have.</p> <p>The New Cross site</p> <ul style="list-style-type: none"> • It is very unsuitable. It is a loss of amenities. There is play court area for young people who do not have many facilities. Scotney Hall is closed. This is something that teenagers use. There is only a play area for small kids. • The social club is used by older people and there isn't anything for them to do. • It is unsuitable because it beside a densely-populated area with very little facilities. Where crime is high – need more facilities (not less). • The area has a problem with parked cars and abandoned cars. • The land is not sufficient for what is proposed (including it being in a flood plain). 	Noted. See responses to the New Cross Gate Trust and the Environment Agency.
Councillor Allan Hall on behalf of all Bellingham Councillors	<ul style="list-style-type: none"> • Size and shape of site –appears inadequately small and tokenistic (particularly when Bromley and Southwark have better facilities) • The approved search parameters include that that the proposed land for the site be Council-owned and available now. Land at Poole Court is neither • Loss of business at a time when councils will become reliant on business rates. Land more suited to a scaffolding yard. • The proposal suggests building a community, which will inevitably include children, and placing it on a slim strip of land in a potentially unsafe, flood-prone environment sandwiched between a river and a railway line. • The Natural Environment Research Council (NERC) specifies that Gypsy and Traveller sites should be provided at locations with good 	<p>The Masterplan and Capacity study demonstrates that the potential site could provide at least six traveler pitches.</p> <p>The Mayor and Cabinet report (January 2016) and Potential Sites Report make clear that private land adjoining Council owned land may be considered suitable if it were considered necessary to develop a Council asset. The National Planning Policy for Traveller Sites' notes that to be considered deliverable sites should be available 'now',</p>

Respondent's name	Comment	Officer Response
	<p>access to open space. This location does not comply</p> <ul style="list-style-type: none"> • The average pitch size suggested (400 sqm) is the smallest end of the recommended density rating (London Gypsy & Traveller Unit), concern that this is too small to accommodate roads, turning etc. • Site is a thin, arrow-shaped space with one single point of access at Fordmill Road – does not appear to meet approved criteria for safe vehicular access, or the capability of creating safe vehicular access, for 15m long caravans for parking and turning, including allowing access to emergency services. This could mean disruption/moving around of vehicles to allow deliveries etc. • Question whether the site could include what is needed - a hard standing area for a static caravan, touring caravan and a parking space, plus some capacity to build a single storey amenity, some landscaping/open space and additionally a play area. • The shape and location does not offer much in the way of scope for physical integration with the local community – Concern at proposal to house a third community of under-represented people in this locality of already vulnerable residents. • Bellingham has some of the highest levels of social deprivation throughout the entire borough. Best practice suggests that to allow for better integration and interaction between communities, traveller sites should not be built in socially deprived areas - increased risk of the possibility of local tensions. • Additional stress placed on services which are already operating under pressure, such as health, education and access to employment opportunities. Will there be any consultation with healthcare providers and schools in this area of Bellingham as part of this process? • What provision will there be for electricity and water and how will the Council take care of waste management at the proposed site? • Loss of site of nature conservation value • Concern about flood risk. 	<p>offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within five years. This definition was adopted as Site Selection Criteria 10. Part of the Pool Court site is currently owned by Network Rail, with the possible small addition of current public highway owned by London & Quadrant. Not all the potential site is available 'now', although officers consider that the site is deliverable in that it could be provided within 5 years. In addition, it may be possible to develop the site in phases (with at least 3 pitches on the Council-owned land delivered up to 2021 and at least three further pitches being developed on land currently owned by Network Rail between 2021 and 2031.</p> <p>See response to RHS Site Services Ltd in relation to loss of business space.</p> <p>Officers consider that, subject to detailed design, the site could provide a high-quality and safe environment for the traveler community.</p> <p>See comments on Deprivation and Physical & Social Integration in Appendix 7.</p> <p>See comments on Access and accessibility in Appendix 7.</p>

Respondent's name	Comment	Officer Response
		<p>See comments on Service and infrastructure constraints in Table 14 Appendix 7.</p> <p>See responses to Natural England Environment Agency in relation to flooding/ nature conservation (Table 13 Appendix 7).</p>

Appendix 11: Focus Group Meeting Notes (10-11-16 & 23-11-16)

Focus group discussion - Resident's Lounge, 37 - 61 Pool Court, Catford Thursday 10th November 2016

Participants 10 residents
Estella Kelly Oscar Property Manager, L&Q
Claire Gray Planning Service, LB Lewisham
Belinda Boerkamp Planning Service, LB Lewisham
Megan Mellor Crime Enforcement and Regulation Officer, LB Lewisham

SUMMARY OF ISSUES RAISED:

1. Perceptions of the Traveller Community

- It was raised that there are both positive and negative perceptions of traveller communities in information on the internet. Some residential sites appear to be well managed and others aren't. Some appear to have a family leader who manage community relationships while others don't.
- Many in the group stated that they are not against the travelling community. As a vulnerable group, including older people and some with a disability, their principle concern is personal safety. Because of either personal experience with unauthorised encampments or reports about travellers on the internet and media, the fear is that pitches would be allocated to traveller families where there are issues of anti-social behaviour. There was concern that a residential site wouldn't be properly managed, there would be anti-social behaviour and any tenancy agreement wouldn't be enforced. It was asked whether the Council had assessed any potential impact on Pool Court residents as a vulnerable group.
- It was also a concern that because of the nature of gypsy & traveller culture where extended families support and look after one another, that the travellers or their visitors might encroach into Pool Court. There was a concern that tenancy agreements and road restrictions wouldn't be enforced.

Potential actions:

- Many of the residents have never met members of the travelling community. Some expressed that they would be interested in meeting the Lewisham Traveller outreach officer and some travellers from the different Gypsy & Traveller communities in Lewisham.
- It was discussed that there would be an opportunity for community discussions/feedback on a draft Pitch Allocation Scheme.

2. Existing Issues

Security and feelings of safety - People said they are already afraid to walk around and to have their windows open. There is also an issue with security when entering the property. The concern is that their existing issues with security and feelings of safety would be made worse.

Fly-tipping – Fly-tipping in Pool Court is an existing problem. It was raised that some general members of the community may fly-tip more often thinking that the traveller community would be blamed.

Pool Court parking restrictions – double yellow lines have been installed on one side of Pool Court. Residents said they had originally requested the Council put them on both sides of the street but they were only put on one side. It was raised that larger vehicles including 2 emergency vehicles can't travel along the road, because of people parking on the unrestricted side of the road. They indicated it was used to park by people visiting a nearby Funeral parlour. It was raised that residents would be concerned about any overspill of vehicles from the property next door and worsen the existing issue.

3. Monitoring / Site Management

How often would the Council monitor what's going on the site? This includes the following issues:

- Encroachment of any activities onto Pool Court, e.g. vehicles or caravans of travellers or their visitors.
- Waste management
- The number of people living on the site. It was a concern that permitted numbers would be exceeded without permission.

Noise – how would the Council deal with noise? This includes:

Music (outdoor/indoor). How would this be dealt with in the site management arrangements? It was asked whether residents would be able to talk to the travellers and ask them to turn music down like they sometime ask the scaffolding site to stop banging noises. There is an existing a sense of neighbourliness with the business next door.

Unsupervised children – It was raised that their perception is that children within the traveller community are supervised less by adults. It was a concern that unsupervised children might run around unsupervised by parents.

Focus group discussion - Resident's Lounge, Lewis Silken House, 10 Lovelinch Close, Winslade Estate Wednesday 23rd November 2016

Participants 19 residents
Valda Trowers Independent Living Officer, Lewisham Homes
Belinda Boerkamp Planning Service, LB Lewisham
Michael Westbrook Housing, LB Lewisham
Megan Mellor Crime Enforcement and Regulation Officer, LB Lewisham

SUMMARY OF ISSUES RAISED:

Impact on Community Amenities in the Area

- It was expressed that kids in the area need somewhere to play. Before the football pen was built, kids played football outside Lewis Silken House against the shutters disturbing residents. If the football pen was removed, would it be relocated on the estate?
- It was raised that there is a need for somewhere for people to meet. The Wheelshunters Club has been used for some community occasions and its replacement would be a loss of amenities for the area.

The Number of Traveller Sites in the Area

- It was raised by one resident that there are several other traveller sites nearby and that there are enough in this area.

Perceptions of the Traveller Community

- Many of the group hadn't previously met members of the travelling community and had questions about gypsy and traveller culture. Because of unauthorised encampments that have been in the area, there were concerns about anti-social behaviour and questions about the difference between unauthorised encampments and a managed permanent traveller site.
- Residents asked what a permanent site would look like and whether travellers would be keen to be a part of the community on the estate.

Meeting Housing Needs for All

- It was questioned by one resident whether the Council is giving preferential treatment to members of the travelling community compared to other residents and asked whether travellers are able to choose where they live unlike other residents.
- Another resident expressed that as long as there is a roof over someone's head then they would be happy.

Site Management

How would the residential site be managed? This includes:

- The number of people living on the site. It was a concern that permitted numbers would be exceeded without permission.
- Anti-social behaviour. It was asked if there are any issues on the site how would this be dealt with.

Existing Issues

- **CCTV and feelings of safety** – people said there were issues of existing anti-social behaviour on the estate. Four CCTV cameras have been put in.
- Parking issues - this is an existing issue for residents. Lewisham Homes is responding to this.

Appendix 12: Lewisham Traveller Forum Meeting Notes (11-10-16)

Lewisham Traveller Forum

Date: 11 October 2016 (12:00)
Venue: Wesley Halls

Attendance

Margaret Mongan	Rep
Basil Desousier	Rep
Brenda Downes	GRTU
Claire Gray	LBL
Graham Harrington	LBL
Megan Mellor	LBL
Jon Biddle	Met Police
Susan Hailes	Met Police
Lucy Burrows	Met Police
Ilinca Diaconescu	LGTU

Apologies

Lisa Spall	LBL
Frances McAughly	GRTU

Planning consultation on sites

Claire (LBL) – Explained consultation dates and arrangements, including drop in information sessions.

Ilinca (LGTU) – Asked if there were any lessons learnt from past consultations. Brenda mentioned the last public meeting where the meeting was dominated by a few vocal people.

Claire and Graham (LBL) – The format is different this time, with drop in sessions, rather than public meetings. The drop-in session format doesn't provide individuals with a platform for dominating discussions, and does provide the format for sharing information and more meaningful discussions of the issues and traveller culture.

Margaret (Rep) – Could set up a meeting for travellers to meet the settled community.

Brenda (GRTO) – If Cllrs want meetings or to learn more about travellers Brenda can facilitate meetings, depending on traveller availability.

Jon (Met Police) – Ward Cllr briefings will be important and they may want to attend the drop-in sessions.

Brenda (GRTO) – People will want to talk about illegal encampments, especially near the New Cross site where they have been in high profile locations. Officers need to be prepared for this in discussions.

Claire (LBL) – Lisa Spall (LBL) will attend and Jon Biddle (Met Police) would like to attend.

Ilinca (LGTU) – LGTU may be able to attend too. Health and Education could attend too. Ilinca suggests it shows support from a range of areas across the Council.

Graham (LBL) – Reminder of site selection criteria and process so far: council assets; site size; anywhere in the borough. There has already been one round of consultation on these issues.

Discussion around each of the six sites shortlisted. Hither Green site is privately owned – they could still put in their own planning application.

Discussion on the detail of the Pool Court site:

Ilinca (LGTU) – Access. Does it have to be through the site? Is it wide enough? It seems an awkward shape. Concerned about noise from the railway lines. Noted that part of the site is owned by Network Rail.

Brenda (GRTO) – concerns over emergency vehicle access.

Graham (LBL) – Outlined the design guidance in the Local Plan document. Consultation asks for comment on these including flooding issues and the loss of the scaffolding yard and SINC site.

Discussion on the detail of the New Cross site:

Graham (LBL) – Discussion of the existing uses – social club, MUGA. Council owns the whole site.

Brenda (GRTO) – At the last meeting the poor relations between Southwark and Lewisham travellers was discussed. The threat to Southwark sites is development along Old Kent Road. The Ilderton Road site has a high rail embankment adjoining and now Southwark Council are saying it is no longer safe, and the traveller families may need to move. This may make the New Cross site more favourable again. It is too early to dismiss one site, especially given the uncertainty about the future of the surrounding area.

Ilinca (LGTU) – Will there be replacement facilities at New Cross for the loss of the MUGA and social club? Brenda – any replacement facilities should be opened before the existing facilities are lost.

ALL- Discussion around the waiting list and allocation policy – expect LBL Housing officer to come to a Forum meeting in 2017 – Jan meeting?

Brenda (GRTO) - Why is there a delay in the timetable from April to August? Claire – because of the examination process.

Hate Crimes

Megan (LBL) – LBL are supporting Hate Crime awareness week. Encourage reporting all Hate Crimes, can also be reported via an app. Don't have to go to the Police Station and can report anonymously but wouldn't get any feedback. Brenda and the Irish Centre will be a 3rd party for reporting and anonymous incidents could be reported through them.

Speed limit

Jon (Met Police) – Speed limit down to 20mph and signs on all roads where it applies.

Next meetings:

Wednesday 9 November, 10.30am, Wesley Halls