

Lewisham Local Plan

Regulation 22 Consultation Statement

Appendix 3 Regulation 22 Draft Local Plan Consultation Written Representations Table

November 2023



Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
CON001	REP001		Alan	Hall	0	General	I have raised the matters below in the Regulation 18 consultation and I cannot see that they have been addressed in full. Hence, I am submitting these detailed comments as part of the Regulation 19 consultation:	<p>The Council notes the suggestion that previous representations submitted under the earlier Regulation 18 consultation were not consider nor used to inform the content of the new Lewisham Local Plan. For clarity, where appropriate the Council has identified (see below) how those original representations were considered and how they informed the latest version of the Plan.</p> <p>The Council does not consider this comment to raise any legal issues relevant to the new Plan.</p>	No further actions required in relation to the new Local Plan.
CON001	REP002 a, b and c		Alan	Hall	3	LSA SA 02 LSA SA 09 LSA SA 21	<p>The Integrated Impact Assessment on the Local Plan published November 2020 states:</p> <p>“There will also be a need to consider in-combination issues and opportunities associated with redevelopment at both Bell Green Retail Park, as the southern extent of the Pool River Linear Park, and two sites at the northern extent, namely Wickes and Halfords, Catford Road and Pool Court (proposed as a gypsy and traveller site; currently comprises a Site of Importance for Nature Conservation, SINC).</p> <p>There could feasibly be an opportunity to extend the Linear Park into one or both of the larger development sites, and it is recommended that this option is explored, with a view to an overall biodiversity net gain, as measured/calculated at an appropriate functional scale. Extending the Linear Park would also be in line with open space objectives, noting the key finding of the Lewisham Open Spaces Assessment (2019), which is that a significant amount of additional provision will be required to maintain standards (of access to open space) over the long-term. However, it is recognised that there is a need to balance wide ranging objectives when considering how best to redevelop these sites.</p> <p>I support the expansion of the Linear Park.</p> <p>Site specific policy currently states:</p> <ul style="list-style-type: none"> Bell Green Retail Park – “Development proposals must protect and seek to enhance green infrastructure, including SINC, green corridor, Metropolitan Open Land and the Pool River.” 	<p>The Council notes the references to the Integrated Impact Assessment (2020) and welcomes the stated support for the expansion of the Pool River Linear Park, which is designated in the new Local Plan as a mix of Metropolitan Open Land and Strategic Open Space.</p> <p>The Council believes that the new Local Plan site allocations provide sound guidance to development partners to enable the preparation and submission of development proposals. It is entirely correct that the detail components of such proposals be brought and assessed through the development management process. This approach provides sufficient flexibility to consider matters that are beyond the reasonable scope of the new Local Plan to assess. It would be unreasonable and impractical for the new Local Plan to attempt to set specific and potentially highly prescriptive commitments. Such an approach would also be unjustifiable in terms of supporting evidence.</p> <p>In respect of the desired community-led masterplan, the Council does not consider this a matter of soundness. The new Local Plan Site is clear in stating that future supplementary planning documents and/or masterplans for the area will complement site allocations. For the</p>	No further actions required in relation to the new Local Plan.

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							<ul style="list-style-type: none"> Wickes and Halfords, Catford Road – “Development should maximise opportunities to enhance the ecological quality and amenity provided by the River Ravensbourne, including by revealing the river through deculverting, repairing gaps in Waterlink Way and improving public access to it.” This site specific policy is broadly in accordance with the Site Specific Design and Development Guidelines set for Wickes and Halfords, Catford Road within the adopted River Corridor Improvement Plan SPD (2015). Figure 9.1 shows one of the figures from the SPD, showing the location of the Pool River Linear Park between BGLS and Catford, also highlighting proximity of Beckenham Palace Park. Pool Court – the site specific policy does not reference biodiversity constraints or opportunities; however, it explains: “Applicants should consult with Network Rail and Transport for London on design and development options.” <p>I would like to see the biodiversity and green space commitments explicitly included in this Local Plan and at the sites mentioned above.</p> <p>In Bell Green, a community masterplanning approach should be undertaken and the proposals as they stand are unacceptable.</p> <p>The heritage assets of the Livesey Hall, War Memorial and Grounds needs to be fully recognised in any plan for Bell Green.</p>	<p>purposes of clarity such future documents will be subservient to their parent policies contained within the new Local Plan and provide relevant additional detail as to how the allocation will be delivered. The Council will work closely with development industry partners to ensure that such exercises fully engage with local communities.</p> <p>Designated heritage assets, such as those mentioned in this representation, will be given an appropriate and proportionate level of consideration by future proposals in the Bell Green area.</p>	
CON001	REP003 a and b		Alan	Hall	3	LSA SA 07 LSA SA 08	<p>On the proposed Gypsy and Travellers Site the document makes the specific comments:</p> <p>“9.7.5 Finally, there is a need to consider the proposed strategy in respect of meeting gypsy and traveller accommodation needs.</p> <p>The background is as follows: The Lewisham Gypsy and Traveller Accommodation Assessment (2015 and amended 2016) identifies a minimum need for six pitches within the plan period, arising from people currently living in bricks and mortar homes, teenage children and household formation. Having regard to this assessment, the Council commenced preparation of a Gypsy and Traveller Site Local Plan. This set out the approach to meeting identified local need for this group, including through site allocation policies.</p>	<p>The content of this representation was considered by the Council during the earlier Regulation 18 consultation.</p> <p>The Council considers the proposed approach sound. Evidence demonstrates that the number of pitches required to meet local needs can be delivered at the Pool Court site.</p> <p>It is acknowledged that there are site development constraints, including the SINC, but that these do not prevent the deliverability and developability of the site. The Council considers that there is a reasonable expectation these can be addressed at the design and planning</p>	No further actions required in relation to the new Local Plan.

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							<p>A Preferred Site Consultation was then over six weeks in 2018. Consultation responses have been considered and negotiations with landowners are progressing. This is particularly to ensure that any future proposed site is deliverable for the intended use, and that feedback from the wider public is appropriately addressed.</p> <p>9.7.6 In light of the above, the Draft Local Plan proposes an allocation at Pool Court, which is a 0.3 ha site located to just to the southwest of the Catford Masterplan area; specifically, to the south of the large proposed allocation at Wickes and Halfords, Catford Road. The site comprises a 'left over' triangle of land at the point where the two railways south of Catford cross-over one another. The River Ravensbourne borders the site, and the confluence of the rivers Ravensbourne and Pool is near adjacent to the west of the site (separated by the railway); however, the site is shown intersect flood zone 2 (as opposed to flood zone 3, which constrains Wickes and Halfords, Catford Road), presumably because the river is effectively channelled or culverted at this point.</p> <p>A related constraint is the on-site local nature conservation (SINC) designation, and it is important to consider the biodiversity value of this site not only isolation, but as one element of the ecological network associated with the Ravensbourne and Pool river valleys (see discussion of the Wickes and Halfords site above, under 'Biodiversity'). Whilst it is recognised that this site has been identified following a site selection process undertaken over a number of years, given the onsite constraints, it is recommended that further detailed assessments of biodiversity and flood risk are undertaken, with additional requirements/guidance included within the site allocation, as appropriate; the council should also continue to explore other opportunities to meet the housing needs of this group."</p> <p>https://councilmeetings.lewisham.gov.uk/documents/s76177/Annex%203b%20Lewisham%20Local%20Plan%20IIA%20-%20Interim%20IIA%20Report.pdf</p> <p>I support the need for further detailed consideration of the negative impact to biodiversity and the SINC.</p> <p>Not only this, I believe that this site is insufficient to meet the needs of the Traveller community and that as a stand alone policy is insufficient to comply with the London Plan.</p>	<p>application stage, and through the Development Management process.</p> <p>Following the Regulation 18 consultation the site allocation was amended to include additional development requirements for biodiversity and flood risk management.</p>	

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CON001	REP004		Alan	Hall	2	Schedule 2 Table 21.2 Table showing designated heritage assets	On the section relating to London Squares, I have sent information that a London Square on Taymount Rise is absent from the Council's list and this should be included now.	Local Plans are snapshots in time and are prepared using data that is available during their production. Heritage assets are designated outside of the Local Plan-making process, and it is possible that more current data could become available during the Plan period. This is normal. Nevertheless, the Council will consider this comment and determination whether a designated heritage assessment has been omitted.	Determine whether the identified site is a designated heritage asset. Subject to it being a designated heritage asset consider its addition to Table 21.2 as a minor modification (omission).
CON001	REP005		Alan	Hall	2	HO 03	<p>Genuinely Affordable Housing</p> <p>If delivery of genuinely affordable housing is a clear corporate priority for Lewisham Council then The Local Plan needs to set a strategic target for 50 per cent of all new homes delivered in the Borough to be locally defined as housing at social rent levels, below the GLA's London Affordable Rent level. This would recognise the distinctive characteristics of the local housing market and the relative affordability of different types of provision to the resident population.</p> <p>All other housing products below market levels, whether for sale or rent, are defined as intermediate housing, and should not be conflated with genuinely affordable housing.</p> <p>To be clear, a target of 50% of all new homes built to be 'genuinely affordable', which is defined as housing at social rent levels (which is set on the basis of local income levels); this means that intermediate and market housing products would not be considered as genuinely affordable.</p>	<p>The content of this representation was considered by the Council during the earlier Regulation 18 consultation.</p> <p>The new Lewisham Local sets a strategic target of 50% for all new homes to be genuinely affordable, with affordability linked to local income levels. This target is informed by the Lewisham Strategic Housing Market Assessment.</p> <p>The new Local Plan clearly defines that within Lewisham genuinely affordable housing is housing at social rent levels or the GLA London Affordable Rent level (in Lewisham this is GLA London Affordable Rent minus the 1 per cent above Consumer Price Index uplift).</p>	No further actions required in relation to the new Local Plan.
CON001	REP006		Alan	Hall	2	HE 3	I support the designation of the Bellingham Estate as an Area of Special Local Character and we support further consideration to making this a Conservation Area.	The Council welcomes support for its approach to Non-Designated Heritage Assets.	No further actions required in relation to the new Local Plan.
CON001	REP007		Alan	Hall	3	LSA 1	The Industrial Estate in Bellingham is a successful employment zone. The designation needs to be reinforced.	The employment provision located at Worsley Bridge Road is protected as a Locally Significant Industrial Site under Local Plan Policy EC6. This seeks to retain the site for employment uses – specifically for Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and related Sui Generis uses. It is unclear what further levels of protection for the site are being sought, or what the justification is for such additional protection.	No further actions required in relation to the new Local Plan.

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CON001	REP008		Alan	Hall	2	G2 2	Local Green Space and Metropolitan Open Land needs to be designated at Coutra Road in Crofton Park and along the railway cuttings from Forest Hill, Honor Oak Park through to New Cross Gate.	<p>The content of this representation was considered by the Council during the earlier Regulation 18 consultation.</p> <p>Following the Regulation 18 consultation the new Local Plan was amended in accordance with the Metropolitan Open land Review Additional Sites Report. Accordingly, Buckthorne Cutting, including the Old Scouts Hut, has been designated as proposed Metropolitan Open Land, which has the same level of protection as Green Belt.</p>	No further actions required in relation to the new Local Plan.
CON001	REP009		Alan	Hall	2	TR 1	<p>I understand that the longstanding commitment for a railway station at Surrey Canal Road is in doubt. Lewisham Council paid for the enabling works along the old East London Line many years ago yet, no station has opened.</p> <p>If the tall buildings and high density are to be achieved there needs to be better public transport. The bus services currently are inadequate.</p> <p>Again, tall buildings and increases in density for residential uses require open space. The commitment to a [linear] park along the route of the old surrey canal need to be maintained and strengthened. Mature trees in the area should be mapped and retained where possible.</p>	<p>The Council assumes that the new railway station referred to within this comment is that proposed for the London Overground network, on the line from Surrey Quays to Clapham Junction. The London Overground Network, although part of the national railway network is under the concession control of Transport for London – who are an infrastructure partner delivering new investment in support of the new Local Plan. Whilst the Council welcomes and supports investment in the Borough’s sustainable travel networks, ultimately the delivery of new railway stations is beyond its immediate control. Nevertheless, the new Local Plan provides facilitating support where appropriate. Fundamentally, this is not an issue of soundness.</p> <p>The Council agrees with the comment that higher intensity developments need to be proportionately supported by investment in sustainable travel network. The new Local Plan, and it’s associated Infrastructure Delivery Plan seek to support such investment.</p> <p>The provision of new and improved green infrastructure networks, as integral components of higher intensity residential developments, including those involving tall buildings, is supported by the new Local Plan through its policies on high quality design and green infrastructure.</p>	No further actions required in relation to the new Local Plan.

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CON001	REP010		Alan	Hall	2	EC 2	The loss of employment spaces in generally and in Deptford & Bellingham including Bell Green lacks proper justification. The London Borough of Lewisham needs employment areas. There is insufficient consideration of new employment as a solution.	<p>It is unclear which specific sites or proposals that this comment seeks to reference. The Council has, through the new Local Plan's spatial strategy, site allocations and planning policies sought to protect viable employment sites from loss to non-commercial uses.</p> <p>The specific sites that the new Local Plan is seeking to reallocate from their current Strategic Industrial Location designation to a new Local Strategic Industrial Site designation will remain in mixed-use. In some cases, these sites may realise higher employment densities/ numbers under their new designation than they previously did as Strategic Industrial Locations. New replacement Strategic Industrial Location provision has been identified at the Bermondsey Dive Under site. In summary, the Council believes that the new Local Plan take a sound approach towards this matter.</p>	No further actions required in relation to the new Local Plan.
CON001	REP011		Alan	Hall	0	General - consultation	Finally, the fact that the Regulation 18 consultation was conducted during a pandemic and at a time of limited communication including during an election period needs to be acknowledged. These procedural flaws are compounded by this consultation taking place simultaneously with changes to the Statement of Community Involvement and the fact that constitutional changes to Lewisham Council's planning arrangements have been agreed by the Council whilst this consultation was underway. That is to say, the whole planning process has been in flux whilst this consultation has been undertaken. Taking all of this in account, more formal consultation is required to achieve a common understanding of all the plans and changes proposed. Therefore, this leads me to conclude that this consultation at Regulation 19 is inadequate. The plans are unsound. There is no evidence that these proposals are compliant with the London Plan nor that neighbouring local authorities have positively engaged. I trust that this letter will be forwarded to the Planning Inspectorate.	<p>The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents.</p> <p>The suggestion that the formal consultations, at the Regulation 18 and Regulation 19 stages, were in some way impeded by restrictions related to the COVID 19 restrictions and recent elections is not supported by any evidence.</p> <p>The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement. Evidence is provided through the Regulation 19 Statement of Representations Procedure and the subsequent Regulation 19 Consultation Statement.</p> <p>The Council notes the comment related to compliance with the London Plan. For clarity, this is not a legal requirement nor is it a test of soundness. Compliance with</p>	<p>Ensure that the Council's Statement on the discharge of the Duty to Co-operate is published and submitted to the examination.</p> <p>Ensure that Statements of Common Ground with neighbouring local planning authority partners are published and submitted.</p>

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								<p>London Plan remains a matter that can be discussed through the examination process.</p> <p>Throughout the plan-making process the Council has worked work positively with its neighbours to meet the requirements of the Duty to Co-operate. The Council will seek to agree and publish a Statement of Common Ground with its partners setting out the matters on which they have reached agreement and those upon which they have not. These will be supported by a formal statement on how the requirements of the Duty have been met. It is noted that the Duty is not a prerequisite for universal agreement on all matters.</p>	
CON002	REP012		Alexander	Taylor	3	LSA 03	<p>I wish to express my objection to the current Lewisham Local Plan with specific reference to Bell Green.</p> <p>There is various reference to the Bell Green Masterplan, with recommendations that developers should be led by this proposal. However this Masterplan appears brief at best and wholly inadequate to provide objective guidance and reference to developers. Moreover, consultation with local residents has been nonexistent. As a local resident, I have spoken to many neighbours and they are equally perplexed by a Masterplan which we have not been consulted on in anyway. Therefore, how Lewisham can make any claim that it will serve local residents, without consulting any such residents is at best incompetent.</p>	<p>The Council does not consider this a matter of soundness. The new Local Plan Site Allocation Policy LSA3 Bell Green and Lower Sydenham is clear in stating that future supplementary planning documents and/ or masterplans for the area will complement the allocation. For the purposes of clarity such future documents will be subservient to this, and other parent policies contained within the new Local Plan and provide relevant additional detail as to how the allocation will be delivered.</p> <p>It is unclear as to which published document the respondent is referring. It is possible that the reference is in relation to the <u>Lower Sydenham and Bell Green Vision Study (2021)</u> . For clarity, this is neither intended as a masterplan nor supplementary planning document (in relation to this policy).</p>	No further actions required in relation to the new Local Plan.
CON002	REP013		Alexander	Taylor	2	QD 04	<p>A similar view I take with regards to the Tall Building addendum report. It is clear that Lewisham has given no consideration to the general area in a wider context. The areas designated are located incredibly close to and will be overbearing to the traditional terrace housing which is extensively found to all sides of the site, particularly the north and west. The only other areas where buildings of this height can be found are in central Bromley and Lewisham. How</p>	<p>The Council believes that the new Local Plan has been informed by a comprehensive evidence base. This includes a thorough assessment of the possible impacts of the planned-for scale and intensity of growth across the Borough. This is particularly in respect of assessment of potential impacts on the</p>	No further actions required in relation to the new Local Plan.

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							similar building heights can be deemed appropriate for the Bell Green area given the wider context of housing, is inexplicable and completely unjustified.	design, character and setting of existing places across the Borough. This evidence has been considered within the wider context of possible impacts upon designated heritage assets – including conservation areas and listed buildings. The Council considers new Local Plan Policy QD4 to be justified.	
CON002	REP014		Alexander	Taylor	3	General - consultation	<p>The local residents have lost such trust with Lewisham and this is yet another example of Bell Green residents being faced with a constant onslaught of excessive proposals with no reasonable or well communicated community engagement, which results in a damning verdict on the manner in which Lewisham run local council and care for their community.</p> <p>I look forward and would welcome further proposals for engagement with local residents before making any further proposals with regards to Bell Green.</p>	<p>The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents. The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement. Evidence is provided through the Regulation 19 Statement of Representations Procedure and the subsequent Regulation 19 Consultation Statement.</p> <p>The Council notes the concerns expressed. Both plan-making and decision-taking processes provide residents, communities, and any other party with an interest with opportunities to engage and inform the delivery of growth. The Council seeks to optimise these opportunities and has been reviewing its statement of community involvement to achieve that objective.</p>	No further actions required in relation to the new Local Plan.
CON003	REP015		Anna	Stern	3	LSA 01	<p>Response to Policy LSA1: South Area place principle.</p> <p>This policy is not sound in relation to policy LSA1a, which cites the Open Lewisham strategic objective (OL1), in the absence of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve.</p> <p>The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to start this as soon as possible. We are told that the neighbourhood will be ‘focused around a new local centre’, but without a masterplan, we don’t know where the focal point will be. Deciding on the eventual position of the new station and bus interchange would allow the central area to be planned around it.</p>	<p>The Council does not consider this a matter of soundness. It is entirely correct that the site allocations contained within the new Local Plan set out requirements, where necessary and appropriate, that masterplans or further supplementary planning documents, be prepared following adoption or as part of the delivery and development management processes.</p> <p>For the purposes of clarity, it is highlighted that masterplans and supplementary planning documents must have parent policies, located within an up-to-date local plan. Sequentially, the relevant local plan parent policies must be adopted in advance of any subservient supplementary</p>	No further actions required in relation to the new Local Plan.

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							<p>Good growth opportunities for Bell Green are blocked by waiting for the Bakerloo Line. For decades, this has delayed any decision on relocating the current station which is isolated, connecting with only one bus, from Bell Green to Bromley. The Bakerloo extension 2 is unlikely to happen within the lifespan of this Local Plan, and alternative strategies exist to enable positive development. If the current station was moved, it would immediately improve PTAL rating, even if it weren't possible to convert the line for underground or overground services.</p> <p>None of the active travel connectivity can be delivered in the absence of a Bell Green Masterplan, as developers cannot deliver any such connectivity on a single plot. Once the desired routes are set out in the Masterplan, developers have something to work on. (Policy LSA I)</p> <p>Sydenham Green Health Centre (SA5) is already grossly overstretched due to new housing developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. This is classed as urgent, but has not been actioned, and there is no evidence of any plans in place. Any new developments will overwhelm the Health Centre's capacity, so this vital infrastructure needs expanding whether the N4 hub project is confirmed or not. This should be included in the Bell Green Masterplan.</p>	<p>document or masterplan. For that reason, the Council considers the approach set out under new Local Plan to be sound.</p> <p>Following the adoption of the new Lewisham Local Plan, the Council will be better placed to consider the preparation and production of necessary supplementary planning documents. The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents. The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement.</p> <p>The Council acknowledges that residents and communities can become frustrated by the development lead-in times required for major strategic infrastructure improvements – such as the proposed Bakerloo Line extension and potential railway station relocations. Infrastructure improvements of this scale and nature are complex and require significant investment. The new Local Plan covers a period of fifteen years but, in accordance with national planning policy (NPPF Paragraph 22), can look further ahead to consider the likely timescale for delivery of both growth and associated infrastructure. Within this context it would be premature to consider the early implementation of an alternative strategy which may later prejudice a wider objective. Nevertheless, the Council believes that the new Local Plan and the associated Infrastructure Delivery Plan are sufficiently flexible enough to allow for the consideration of alternative solutions should the Bakerloo Line Extension prove unforthcoming.</p>	
CON003	REP016		Anna	Stern	3	LSA 02	<p>Response to Policy LSA2 South Area place principle. This policy is not sound in relation to policy LSA2b, due to the lack of a Bell Green Masterplan, robust data about the existing and projected future capacity needed in social infrastructure, and other vital supporting evidence. The lack of these guidelines makes the policy ineffective in what it sets out to</p>	<p>The Council does not consider this a matter of soundness. It is entirely correct that the site allocations contained within the new Local Plan set out requirements, where necessary and appropriate, that masterplans or further supplementary</p>	No further actions required in relation to the new Local Plan.

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							<p>achieve. The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to get started without delay.</p> <p>Significant transport accessibility improvements, active travel routes, and the transformation of the retail park into a new mixed-use neighbourhood cannot happen without a masterplan (LSA2b). Waiting for the Bakerloo campaign is delaying good growth in Bell Green. Move the station, and either the mainline service or Overground would improve connectivity and accessibility. It could be used by the Bakerloo line when that arrives. Whatever the future of the line, the new station is vital. This needs to be specified in the proposed Bell Green Masterplan.</p> <p>Bell Green is proposed as a regeneration node, in a Strategic Area for Regeneration. However, its proposed status has been downgraded from a proposed new Town Centre to a Local Centre. * The sites' indicative growth potential is shown for a town centre. The scope of brownfield development at Bell Green will create far more than a small cluster of shops for convenience retail, and a community anchor. It has far more than that already. The LLP seems conflicted about Bell Green's future, and it needs to be clarified before the GLA will consider designating it as an Opportunity Area.</p> <p>*"Commented [NE791]: Latest Retail Impact Assessment and Town Centre Trends Study indicates scope for Local Centre is appropriate – this is reflected in amended policy point C.c above."</p>	<p>planning documents, be prepared following adoption or as part of the delivery and development management processes.</p> <p>For the purposes of clarity, it is highlighted that masterplans and supplementary planning documents must have parent policies, located within an up-to-date local plan. Sequentially, the relevant local plan parent policies must be adopted in advance of any subservient supplementary document or masterplan. For that reason, the Council considers the approach set out under new Local Plan to be sound.</p> <p>Following the adoption of the new Lewisham Local Plan, the Council will be better placed to consider the preparation and production of necessary supplementary planning documents. The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents. The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement.</p> <p>The Council notes comments made in relation to Bell Green's status as a Local Centre. For clarity, its status as such is a statement of fact and not a retrograding action. The Council acknowledges that following the regeneration of the Area the extent of commercial and retail activity may increase – indeed this is a desirable outcome of sustainable growth. Should that happen, the Council will reassess its status and redesignate accordingly.</p>	
CON003	REP017		Anna	Stern	3	LSA 03	<p>Response to Policy LSA3 Bell Green and Lower Sydenham</p> <p>This policy is not sound in relation to Policy LSA3c, due to the lack of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve.</p> <p>We need a Masterplan before the GLA will even consider designating Bell Green as an Opportunity Area. (LSA3 A).</p>	<p>The Council does not consider this a matter of soundness. It is entirely correct that the site allocations contained within the new Local Plan set out requirements, where necessary and appropriate, that masterplans or further supplementary planning documents, be prepared following adoption or as part of the</p>	No further actions required in relation to the new Local Plan.

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							<p>Lewisham has not started on a Masterplan (LSA3 B), despite having rejected the designation of a community Neighbourhood Forum that wished to create one. The aspiring Bell Green Neighbourhood Forum, refused designation by Lewisham, started work in 2019, and has had an extraordinarily hostile response from Lewisham, who have refused to have any discussions with us. We have a membership of 80, and despite an overwhelmingly positive local consultation response, Lewisham rejected our Area boundary, and so our Forum. They have since also refused to recognise us as an amenity society, having changed their definition of such groups to being based on the boundary of a single conservation area. This gives us little confidence in the delivery of such consultation.</p> <p>The missing Masterplan undermines the aspirations expressed in Policy LSA3c; redevelopment of SA1, the Livesey Memorial Hall and gasworks site, is already underway in the planning process; local residents' aspirations for the Masterplan, such as a reconfiguration of the roads and pedestrian access (LSA3 Ce) are being blocked. LSA3 Cg: infrastructure.</p> <p>Currently there are extreme problems with the electricity grid at Bell Green retail park, with units powered entirely by diesel generators. There are frequent power cuts at the supermarkets, shutting off the fridges and freezers. Existing landowners and developers must cooperate to address the problem in advance of development.</p> <p>Policy LSA3 Dd urges developers to respond positively to heritage assets and their setting, including the Livesey Hall War Memorial and gardens. This should read the (grade II listed) Livesey Memorial Hall, the Livesey Hall War Memorial, the Livesey Hall's Front Wall, and sportsgrounds. NOT gardens. This aspiration is being undermined by the lack of a Masterplan, which is allowing developers to push for tall buildings in close proximity with the Hall, threatening its viability as our Asset of Community Value. It is also undermining the Agent of Change protection of this important community hall, whose existing use of music, live performance and events for the local community is to be undermined by intensive residential development in close proximity. This will lead to conflict between the existing use and the new residents' quality of life.</p>	<p>delivery and development management processes.</p> <p>For the purposes of clarity, it is highlighted that masterplans and supplementary planning documents must have parent policies, located within an up-to-date local plan. Sequentially, the relevant local plan parent policies must be adopted in advance of any subservient supplementary document or masterplan. For that reason, the Council considers the approach set out under new Local Plan Policy LSA 3 to be sound.</p> <p>Following the adoption of the new Lewisham Local Plan, the Council will be better placed to consider the preparation and production of necessary supplementary planning documents. The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents. The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement.</p> <p>In respect of neighbourhood planning, the Council continues to work positively with all bodies across the Borough seeking to establish themselves as Neighbourhood Forums. The processes of identifying a new neighbourhood area and establishing a forum are carried in accordance with The Neighbourhood Planning (General) Regulations 2012.</p> <p>The Council considers that proposed modifications to new Local Plan Policy LSA 3 D d) are not matters of soundness. Whilst the additions may provide additional detail for the reader, they do not necessary in themselves to make it sound. The new Local Plan must be considered in its entirety. As such, new Local Plan Policy HE2 provides an appropriate framework to consider</p>	

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								proposals relation to designated heritage assets.	
CON003	REP018		Anna	Stern	3	LSA SA 01	<p>SA1: Former Bell Green Gas Holders and Livesey Memorial Hall SA1's boundary is problematic; two interlocking sites with separate landowners, both currently in the planning system (Apex and Barratt London), plus a third landowner (SGN), currently withholding its land from development. This site allocation policy is not sound, as the omission of the gas pressure station prevents the creation of a coherent street pattern.</p> <p>The southeast corner is designated as an Appropriate Location For Tall Buildings, despite its proximity to the listed structures of the Livesey Memorial Hall, the most sensitive and heritage-rich section of Bell Green. This proposed designation derives from the site-ownership-based boundaries shown at r18. The poor-quality mapping provided for the Tall Buildings zones, shown in opaque orange, obscured this block's isolation from the rest of the Tall Building zone by the Spine Road, which is a public highway, and a major access road. The relevant section of public highway is included in the r19 site boundary, though it cannot be developed. This isolated block has been overlooked by all but the most intense scrutiny.</p> <p>SGN provided Lewisham with a plan, offering their gas pressure station area for development, yet their current public stance is that this area cannot be developed for safety reasons. This causes huge difficulties for the adjoining developments, as cooperation between developers to create a coherent streetscape is non-existent. This piecemeal approach won't build a positive community.</p> <p>The Apex (Livesey Memorial Hall) site includes a strip of land adjoining the 'British Gas Exclusion Zone' SINC extension, which was assessed as being identical habitat to the SINC and designated in the Parks and Open Spaces strategy 2020-2025 (2020) as natural greenspace (not publicly accessible). Allowing Apex to redevelop this precious natural habitat within a toxic, barren landscape seems inexplicable. The site gradients make the proposed green pathway impossible. The SINC sites were assessed in 2016 and have not been reviewed since. Even in 2016, no site visit was made, and it may have been classified by satellite photography. The report states: "Access to privately-owned sites was not always possible. This was due to a number of reasons includingDense vegetation next to waterbodies at River Ravensbourne and Pool River Linear Park; combination of field survey, aerial photography and professional judgement was used to determine what habitats</p>	<p>The Council notes the comments made in relation to the fragmented landownership and the possible constraints that this poses to comprehensive redevelopment of the site allocation.</p> <p>The new Local Plan Policy LSA SA 01 seeks to secure a comprehensive redevelopment of this site allocation. The policy wording responds to this by clearly stating that the landowners across the site must work together in partnership and in accordance with a master plan for the wider Bell Green and Lower Sydenham area and including a site masterplan, to ensure appropriate co-location, phasing, and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). It is not unusual for previously developed sites located in urban areas to be in multiple landownerships. This is never in itself a constraint to comprehensive development. The development process remains the appropriate platform for this matter to be resolved in detail. The policy, in conjunction with the new Local Plan Policy DM3, provides effective mechanism to do so.</p> <p>In respect of the possible impact of tall new buildings upon the setting of heritage assets and/ or the visual character and appearance of the wider townscape – the Council considers that this matter is also appropriately addressed through the development management process. The requirement for site specific masterplan provides an ideal opportunity for development partners and residents to consider how tall new buildings can be incorporated into this site, and the wider townscape. The policies set out in the new Local Plan under Chapter 5 High Quality Design provide a justified and effective</p>	No further actions required in relation to the new Local Plan.

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							<p>are likely to be present in areas not accessible by foot. However, in most cases surveying was possible from publicly accessible vantage points (such as from bridges or adjacent roads or open space.” (p.38). Given that best practice is that environmental surveys should be renewed after c. 2 years, the status of the SINC extension, or at least the natural greenspace within the Apex site should be reviewed.</p> <p>Provision of sports facilities is of huge concern, given the closure of the Bridge Leisure Centre, and the imminent threat to the sports grounds at the Livesey Memorial Hall (SA1). Sport England, in their r18 response, stress the absence of a robust database. They say that this should include a revised Playing Pitch Strategy, and the Physical Activity and Healthy Lifestyles Strategy. Neither of these documents are published, and the current documents state that the Bridge as a functioning sports hall with swimming pools. We cannot assess Bell Green’s sports provision need for new developments without a robust database; this information should have been included for the consultation process. An officer’s report made in April 2023 says that ‘3.1. We are in the process of arranging a steering group meeting to ensure the PPS is still fit for purpose/relevant. This is in relation to changes in the way sport and physical activity are viewed post pandemic.’ The Local Plan has been progressed before the necessary documents have been gathered.</p> <p>Agent of Change. Policy QD7 Cd. of the LLP says that new noise-sensitive development is situated away from existing noise-generating uses and activities, or, where this is not possible, providing adequate separation and acoustic design measures. The Livesey is a community hall whose existing uses include live performance, music, and events, which generates a great deal of noise. This is not a problem currently, and the arrival of housing close by will create a great deal of ongoing friction. The site boundary doesn’t include the necessary no-build zone to protect the existing use of the Livesey. Agent of Change Policy QD7 Cf. says that development must not prejudice the use of playing fields. The Bowls Green of the Livesey Memorial Hall is currently used as an exercise area for the boxing club, including the youth provision of Knives Down, Gloves Up sessions. It has also been used by Brent Knoll school, a nearby special school with very little outside space, none of which is green. Both these schemes, along with other activities for children and young people, will be threatened by child protection concerns with overlooking from housing blocks.</p>	<p>mechanism for considering and determining this matter.</p> <p>In addition, the new Local Plan Policy LSA SA 01 sets out how the redevelopment of this site will secure and deliver site intensification, along with the introduction of a range of uses, will bring the land back into active use and support local area regeneration. This will include public open space, good quality design, infrastructure networks and the requirement to remediate land, as necessary, contaminated by historic uses. The Council considers the site-specific requirements set out in policy to be justified and effective in bringing forward the redevelopment of the site.</p>	

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							Conclusion: In order to make this site allocation sound, its Tall Buildings suitability zone needs reviewing, and robust justification given for its designation. there needs to be clarity over the SGN pressure station's future. It must be included in the design for the site layout, so a coherent street layout can be made. There needs to be a fresh assessment of the British Gas Site Buffer Zone greenspace, and of the greenspace within SA1, omitted from the SINC. The Agent of change aspects of redevelopment must be assessed thoroughly and included in the proposed Bell Green Masterplan.		
CON003	REP019		Anna	Stern	3	LSA SA 03	SA3: Sainsbury's Bell Green The proposed Bell Green Masterplan is needed to address the pedestrian safety issues of traffic bypassing the gyratory system, rat running through Sainsbury's carpark. Improvements in connectivity need to be made immediately to pedestrian access routes, which are currently being poorly served.	The Council does not consider this a matter of soundness. It is entirely correct that the site allocations contained within the new Local Plan set out requirements, where necessary and appropriate, that masterplans or further supplementary planning documents, be prepared following adoption or as part of the delivery and development management processes. It is appropriate that future masterplanning exercises consider the detailed design and provision of transport network improvements necessary to support new development. Although it remains inappropriate for new development to make good any existing deficiencies in infrastructure provision, the masterplanning process can nevertheless identify investment opportunities that the Council and its partners can seek to pursue outside of the delivery/ development management process.	No further actions required in relation to the new Local Plan.
CON003	REP020		Anna	Stern	3	LSA SA 04	SA4: Stanton Square Locally Significant Industrial Site SA4: This site allocation policy is not sound, as its boundary has not been justified robustly. It includes the local heritage asset of the Old Bathhouse, next to the Bell public house. This is a heritage asset which deserves local listing. Built as public slipper baths by Lewisham Council in the end of the 19th century, it survives with much of its interior intact. It is unthinkable that this should be redeveloped, and no justification is given for its inclusion. There is also no acknowledgement in this allocation of the extent of contamination of the Coventry Scaffolding site, and	The Council notes the comments made in relation to the new Local Plan Policy LSA SA 04. Locally listed buildings and structures are non-designated heritage assets. The new Local Plan addresses these under Policy HE3 Non-designated heritage assets. An overview of the Borough's non-designated heritage assets is included in the new Local Plan under Schedule 3 Table 21.3. <u>A full list of locally listed buildings and structures is included on the Council's website.</u> The	No further actions required in relation to the new Local Plan.

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							the wider area from the original gasworks, dating from c. 1850. The safety practices at this date were considerably worse than later, and it continued in gasworks use for many decades.	<p>schedule of locally listed buildings is periodically updated. The new Local Plan Policy HE3 takes account of this and acknowledges that this process, of local listing, may arise during and be considered through the development management process. The local listing process allows for public engagement. For this reason, the Council maintains that the policy is effective.</p> <p>The Council acknowledges that the policy wording does not make explicit reference to possible on-site contamination attributable to historic uses. It is noted that the uses were operational during the 19th Century. Nevertheless, the new Local Plan includes a range of generic development management policies which the Council can deploy to manage such eventualities. Most notably the new Local Plan Policy SD 1 Ground Conditions provides an appropriate and effective mechanism for addressing this matter should it arise.</p>	
CON003	REP021		Anna	Stern	3	LSA SA 05	<p>SA5: Sydenham Green Group Practice</p> <p>Sydenham Green Health Centre (SA5) is already grossly overstretched due to new developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. Classed as urgent, but not actioned, despite being oversubscribed, and the impending housing developments. [Infrastructure Delivery plan].</p>	<p>The Council notes the observation made within the comments about the apparent capacity of the Sydenham Green Health Centre.</p> <p>The Council is committed to securing appropriate investment in the Borough's infrastructure networks to support planned-for growth. Necessary investment is identified through the new Local Plan and the Infrastructure Delivery Plan. Funding for improvements is secured through several possible sources – through CIL, which primarily serves as top-up funding that can also be used to leaver-in other sources; and other external funds/ grants.</p> <p>The Council acknowledges that communities may aspire to securing the necessary investment early – possibly ahead of new development taking place. This is not possible through the</p>	No further actions required in relation to the new Local Plan.

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								mechanisms currently in place – equally, new development can only contribute towards the infrastructure required in support of growth; it cannot be used to make good existing shortfalls in provision. For these reasons the Council concludes that the new Local Plan is effective, positively prepared and is in accordance with national policy.	
CON003	REP022		Anna	Stern	3	LSA SA 08	SA8: Land at Pool Court Policy SA8 is unsound, as it is ineffective in what it sets out to achieve. The site is unsuitable, being unfit for human habitation due to high risk of regular flooding at the confluence of two rivers. The quality of life is further degraded by being closely bordered by two railway lines. This site allocation fails to address Lewisham’s duty to provide a travellers site; what is needed is rather a stopping site. Travellers have crossed the area for at least four hundred years, still do so several times a year, and need somewhere to stop enroute. A tiny residential site doesn’t address this need.	The Council notes the comments made in relation to the new Local Plan Policy LSA SA 08 Land at Pool Court. The Council considers that the site allocation is sound, deliverable, and developable. The site allocation has been assessed through the housing land availability and the sustainability appraisal reporting processes. For those reasons it is considered effective and justified.	No further actions required in relation to the new Local Plan.
CON003	REP023		Anna	Stern	2	EC 18	EC18 Culture, creative industries and the night-time economy The Bell Green Neighbourhood Group supports the application being made for a Bell Green Cultural Quarter. The Livesey Memorial Hall has a proud history of live performance, music, and community events, along with art exhibitions and cultural activities. Sydenham Library hosts art studios, exhibitions, and workshops. It is the base for Spontaneous Productions shows being shown in Home Park, next door. Whirled Art Studios has set up a complex of studios on Stanton Island, which were rented out immediately. My Aerial Home is a distinguished studio and school for aerial circus disciplines, based on the Trade City retail park, and Glenlyn Academy is a dance and performance school based on the Home Park Estate. Given the EC18 policy for growing the creative industries as a source of employment in Lewisham, further studios would be a positive use of the heavily contaminated land of the Coventry Scaffolding yard. Site of the earliest phase of the Bell Green gasworks, the contamination is likely to be very bad, and would be prohibitively expensive to remediate it to the level acceptable for residential use.	The Council notes and welcomes the broad support offered by the representation in relation to the new Local Plan Policy EC 18 Culture, creative industries, and the night-time economy. The Council notes the comments made in relation to the new Local Plan Policy LSA SA 01, which seeks the redevelopment of the former Bell Green Gas Holders and Livesey Memorial Hall. The Council considers the policy approach to the redevelopment of this site to be sound. The new Local Plan Policy LSA SA 01 makes provision for the site to be redeveloped for a mix of uses, which could allow for the types of use identified within the representation.	No further actions required in relation to the new Local Plan.
CON003	REP024		Anna	Stern	4	Schedule 1	Schedule 1. Table 21.1 Livesey Memorial Hall should be added to the list of Local Landmarks.	Local landmarks are a “local” designation. They include both buildings and structures that are non-statutory or designated heritage assets. Their identification is not	Determine whether the identified site has been identified as a local landmark.

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								<p>dependent upon the plan-making process. They can come forward through the conservation area appraisal process or potentially through area masterplanning. The omission of a potential future candidate for local landmark status does not raise an issue of soundness for the new Local Plan.</p> <p>For clarity, it is noted that the Livesey Memorial Hall is a designated heritage asset. As such it's visual character, appearance and wider setting is a consideration for decision-takings and is supported through national policy and new Local Plan Policy HE2.</p>	<p>Subject to this being the case consider its addition to Table 21.1 as a minor modification (omission).</p> <p>Otherwise – no further action required.</p>
CON003	REP025		Anna	Stern	4	Schedule 2	<p>Schedule 2.</p> <p>Table 21.2 Missing from Conservation Area list - The Thorpes Conservation Area.</p> <p>Table 21.2 London Squares – Taymount Rise is missing from the list.</p> <p>Fambridge close is NOT the substitute for the designated Stanton Square. Stanton Square was redeveloped without substitution, and restitution attempts are in process.</p>	<p>The Council acknowledges that the new Local Plan Table 21.2 has omitted the Sydenham Thorpes Conservation Area. The omission shall be address through a minor modification.</p> <p>Local Plans are snapshots in time and are prepared using data that is available during their production. Heritage assets are designated outside of the Local Plan-making process, and it is possible that more current data could become available during the Plan period. This is normal. Nevertheless, the Council will consider this comment and determination whether a designated heritage assessment has been omitted.</p>	<p>Introduce an amendment to Table 21.1 to include Sydenham Thorpes Conservation Area as a minor modification.</p> <p>Determine whether the identified sites are designated heritage assets.</p> <p>Subject to these being a designated heritage asset consider their addition to Table 21.2 as a minor modification (omission).</p>
CON003	REP026		Anna	Stern	4	Schedule 5	<p>Schedule 5</p> <p>Table 21.5 No mention of any retail existing at Bell Green, or on Perry Hill/Catford Hill.</p>	<p>Schedule 5 Table 21.5 is not intended to be a definitive list of all retail provision available across the Borough. It does identify the district and major shopping areas, and the extent of their primary retail areas.</p> <p>The new Local Plan sets out the Borough's town centre and retail hierarchy under Policy EC 12. Figure 8.2 identifies the location of the Borough's town centres and retail offer on a map. In addition, Table 8.4 provides a list of the network's constituent parts and an explanation of their respective roles and functions.</p>	<p>No further actions required in relation to the new Local Plan.</p>

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CON003	REP027		Anna	Stern	4	Schedule 6	Schedule 6 Table 21.6 Cultural Quarters. Please add Bell Green.	<p>The new Local Plan identifies Cultural Quarters through Policy EC18, with the specific objectives of encouraging complementary cultural, community and commercial activities. The new Local Plan Policy EC18 does not currently identify Bell Green as a cultural quarter within this decision-taking context.</p> <p>The new Local Plan Policy EC18 has been informed by supporting evidence and is considered justified. The representation has not provided the examination with any evidence that Bell Green also be considered within the context of new Local Plan Policy EC18.</p>	No further actions required in relation to the new Local Plan.
CON003	REP028		Anna	Stern	4	Schedule 11	Schedule 11 Table 21.11 Growth corridor - Perry Hill- Catford Hill not listed but shown on Policies Map.	<p>The Council notes this comment and possible omission to Table 21.11.</p> <p>The purpose of Table 21.11 is to identify the Regeneration Nodes, Growth Nodes and Growth Corridors across the Borough. It is not intended for this Table to provide a complete list of all places located within the Nodes and Corridors. It is unclear to which map the representation is referring. The new Local Plan identifies the Regeneration Nodes, Growth Nodes and Growth Corridors across the Borough at Figure 3.2 and Figure 3.3, the latter in relation to the Spatial Strategy. The Council concludes that the new Local Plan existing mapping clearly identifies the extent of the Nodes and Corridors, and no further amendments are necessary.</p>	No further actions required in relation to the new Local Plan.
CON003	REP029		Anna	Stern	0	General	<p>Conclusions on the LLP consultations for the attention of the Planning Inspector:</p> <p>Consultation on the Lewisham Local Plan has been deeply flawed. Regulation 18 was conducted during the pandemic, with limited communication available. Anyone with difficulty accessing online material was excluded from involvement in the consultation. Regulation 19 consultation has taken place simultaneously with one on the Statement of Community Involvement, and constitutional changes to Lewisham Council's planning arrangements have already been approved by the full council, in advance of the SCI consultation's conclusions. Taking all of this into account, further formal consultation is needed to achieve a common understanding of</p>	<p>The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents.</p> <p>The suggestion that the formal consultations, at the Regulation 18 and Regulation 19 stages, were in some way impeded by restrictions related to the COVID 19 restrictions and recent elections is not supported by any evidence.</p>	<p>Ensure that the Council's Statement on the discharge of the Duty to Co-operate is published and submitted to the examination.</p> <p>Ensure that Statements of Common Ground with neighbouring local planning authority partners are published and submitted.</p>

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							all the plans and changes proposed. Therefore, the Bell Green Neighbourhood Group concludes that this consultation is not sound, as the draft Lewisham Local Plan is neither robustly justified nor evidence led. The lack of supporting evidence (including the Bell Green Masterplan, the Playing Pitch Strategy and the Physical Activity and Healthy Lifestyles Strategy) means that it cannot be effective in what it sets out to achieve.	The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement. Evidence is provided through the Regulation 19 Statement of Representations Procedure and the subsequent Regulation 19 Consultation Statement.	
CON004	REP030		Barbara	Gray	0	General	<p>As a local resident and In the context that Lewisham has the largest Black population and 3rd largest Caribbean population in the UK, what targetted I would like the consultation to include them in a proportionate and equitable way and for the Plan to represent them and their needs in the future.</p> <p>Could you please say:</p> <ul style="list-style-type: none"> • What has been the representation of Lewisham population by ethnic group of the people who have engaged with the Lewisham Local Plan. • What targetted action has been taken to ensure a representative proportion has a voice in shaping the Local Plan to ensure it provides for the existing population and enables them to thrive. • Whether or not there is a budget for targetted engagement and if not what action will be taken to enable targetted engagement is resourced to enable equitable voice in the placemaking of Lewisham. • Whether there is a commitment and willingness to commission Lewisham based organisations to undertake work to extend this engagement and enable the Lewisham Local Plan to include and be shaped by the voices of Lewisham's Black residents, including the young people, in an equitable way • What the process is for Lewisham Black organisations to secure opportunities to do the work to extend the current Lewisham Local Plan - Regularion 19 consultation <p>It is great to see plans are being revised to reflect changes over time and keen to see it using the unique opportunity Lewisham has</p>	<p>The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents. The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement. Evidence is provided through the Regulation 19 Statement of Representations Procedure and the subsequent Regulation 19 Consultation Statement.</p> <p>In respect of determining and meeting the needs of the Borough's current and future residents and communities, the Council considers that the new Local Plan is supported by a proportionate and robust evidence base. For that reason, the Plan is considered sound.</p>	No further actions required in relation to the new Local Plan.
CON005	REP031		Barnaby	Johnston	2	QD 04	<p>Response on Policy QD4 Building Heights</p> <p>This policy is not sound in relation to the designation of the Building Heights identified for Bell Green and Lower Sydenham in QD4 Part C, and the designation of these areas as a 'Tall Building Suitability Zone', as identified in Figure 5.2 noted in QD4 Part D. This is due to a lack of sound justification and evidence for these designations.</p> <p>Reasons for this response:</p>	The Council believes that the new Local Plan has been informed by a comprehensive evidence base. This includes a thorough assessment of the possible impacts of the planned-for scale and intensity of growth across the Borough. This is particularly in respect of assessment of potential impacts on the	No further actions required in relation to the new Local Plan.

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							<ul style="list-style-type: none"> -The policy QD4, in relation to Bell Green and Lower Sydenham, is based on incorrect assumptions and judgements set out in the justifications referred to, namely the Lewisham Tall Building Study Addendum 2022, the subsequent Tall Buildings Review 2023 and policies regarding the designation of this area as an Opportunity Area (referred to in Policy TR1). These have been used as justification for the designation of a 'Tall Building Suitability Zone' for these areas, which is not appropriate or justified, at the present time. -The Lewisham Tall Building Study Addendum 2022, identifies Bell Green and Lower Sydenham as having good suitability for tall buildings, making an assessment based on assumptions including that the Bakerloo Line will be extended to the Bell Green area within the lifetime of this Local Plan; that there will be a new station at Bell Green; and that this will be part of a 'comprehensive development' implying a development framework being in place. The study states that the site would be suitable for designation given "...the area would be directly served by a new London Underground station with the extended Bakerloo Line. This would underpin the creation of a new town centre..." Given that both the Bakerloo Line Extension and a new station are not identified in the London Plan as being delivered in the lifetime of this Local Plan, then the 'underpinning' of this designation is not justified. -The Lewisham Tall Building Study Addendum 2022, with regards to the sensitivity of the site, also identifies that "...with the exception of the impact of some individual heritage buildings, the Bell Green area is generally identified as less sensitive." The 'some' individual heritage buildings include three nationally Listed structures and the impact of tall building in the setting of these Listed Structures has not been adequately considered by the study. This is contrary to the provisions of Policy QD4 Part D which requires tall buildings "preserve and enhance the significance of heritage assets and their setting". Given that the study does not adequately address this for the Bell Green area it should not be considered 'low sensitivity' and it should not be used as justification for the area becoming a Tall Building Suitability Zone. -The Lewisham Tall Building Study Addendum 2022 has defined what constitutes 'tall' within the Bell Green/Lower Sydenham Area and what can be considered 'maximum heights'. This has been used 	design, character and setting of existing places across the Borough. This evidence has been considered within the wider context of possible impacts upon designated heritage assets – including conservation areas and listed buildings. The Council considers new Local Plan Policy QD4 to be justified.	

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							<p>directly in Policy QD4 Part C. However, in Para.2.9.3 of the study it states “the threshold of what constitutes ‘tall’ within the area is dependent on the improvements to public transport and a comprehensive masterplanning approach being carried out”. In Para. 2.9.5 of the study it states that “Given the scale of change anticipated in this location and the scale of investment in public transport, maximum height of approximately 20 storeys are considered potentially appropriate [for the Bell Green area]”. This potentiality has not occurred and is unlikely to, with no large scale investment in public transport for this area planned or projected in the London Plan. As neither the public transport improvements or the masterplan planning framework are in place, there is no justification for the Policy QD4 to rely on the Lewisham Tall Building Study in terms of setting heights for this area.</p> <ul style="list-style-type: none"> • -The Tall Buildings Review 2023 is unclear in it’s recommendations for the Bell Green/Lower Sydenham area. It states in Para 4.3 that “The maximum heights proposed as suitable within the [Lewisham Tall Building Study] Addendum for Forest Hill Town Centre and Lower Sydenham / Bell Green were both below 10 storeys and therefore these areas would not be considered suitable locations for tall buildings under the definition outlined above.” However it goes on to analyse Bell Green in more granular detail and comes to different conclusions, based only on “local planning knowledge and finer-grain urban analysis” but without a proper impact study. • -The Tall Buildings Review 2023 further considers Bell Green on pages 47-51. It recognises as noted above that without confirmation of the improved public transport infrastructure, there is not the justification for tall buildings as set out in the Lewisham Tall Building Study. However, without any further justification, it concludes that all buildings are still justified on the basis of suitability and sensitivity. While there may be justification for the comprehensive development of the Bell Green area, medium to high density development could be achieved within the context of a planning framework, without the need for tall buildings. The review provides no justification for retaining some of Bell Green as a ‘Tall Building Suitability Zone’ or ‘site that may be suitable for tall buildings’. It is also unclear how the Local Plan Policy QA4 will be revised in light of 		

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							<p>this. With the justification given in the Lewisham Tall Building Study removed, the review should conclude that Bell Green's does not justify any designation for tall buildings and certainly not up to 16 storeys.</p> <ul style="list-style-type: none"> -The Tall Buildings Review 2023 acknowledges the Listed Livesey Memorial Hall has to be considered in terms of impact, however it goes on to suggest that up to 16 storeys may be appropriate in the site in close proximity to the Listed Building (defined as site BG1). This is not justified by any impact study or examination of the setting of the Listed Building. There should be a proper study of the impact of height on the Listed Building before potential heights are suggested. The Local Plan will have to be revised to take account of the Review but it would be more justified to remove all reference to tall buildings with regard to Bell Green until a planning framework can deal with the issue properly. -It should also be noted that Bell Green/Lower Sydenham is not an Opportunity Area in the London Plan. Policy LSA4 states "Bell Green and Lower Sydenham are poised to become one of London's next Opportunity Areas and the Council will support this designation in a future review of the London Plan". However there is no current reason why this is justified as there is no funding for the transport infrastructure to make this viable and it may be decades before this becomes a reality. There is also no Planning Framework for the BellGreen / Lower Sydenham area, a prerequisite for a Opportunity Area. The Council urgently require to progress a detailed framework for the area as they have stated will be done "...to ensure coordination between landowners in the delivery of a new high quality, residential led, mixed-use neighbourhood, which will be informed by consultation with local communities and other key stakeholders". Until this has happened the area should not be considered an Opportunity Area because the extent of the opportunity has not been defined. Policies and studies that rely on this area being an Opportunity Area as a justification for higher building heights are therefore flawed. Applications made on the basis that this is an Opportunity Area are equally flawed as there is no Policy in place which designates this. <p>Conclusion</p>		

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							Given the above considerations, there is not sufficient justification for the Bell Green and Lower Sydenham area to be included as a 'Tall Building Suitability Zone' and all references, including reference in Figure 15.2, should be removed from the prospective Local Plan and the Local Plan Proposed Policies Map. Given this, no heights/maximum heights should be given for this area in the Local Plan and appropriate heights should be determined, as part of the development of a Planning Framework for the area, brought forward by the Council and consulted with the local communities.		
CON006	REP032	Bell Green Neighbourhood Group			3	LSA 01	<p><u>Response to Policy LSA1: South Area place principle.</u></p> <p>This policy is not sound in relation to policy LSA1a, which cites the Open Lewisham strategic objective (OL1), in the absence of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve.</p> <p>The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to start this as soon as possible. We are told that the neighbourhood will be 'focused around a new local centre', but without a masterplan, we don't know where the focal point will be. Deciding on the eventual position of the new station and bus interchange would allow the central area to be planned around it.</p> <p>Good growth opportunities for Bell Green are blocked by waiting for the Bakerloo Line. For decades, this has delayed any decision on relocating the current station which is isolated, connecting with only one bus, from Bell Green to Bromley. The Bakerloo extension 2 is unlikely to happen within the lifespan of this Local Plan, and alternative strategies exist to enable positive development. If the current station was moved, it would immediately improve PTAL rating, even if it weren't possible to convert the line for underground or overground services.</p> <p>None of the active travel connectivity can be delivered in the absence of a Bell Green Masterplan, as developers cannot deliver any such connectivity on a single plot. Once the desired routes are set out in the Masterplan, developers have something to work on. (Policy LSA I)</p>	<p>The Council does not consider this a matter of soundness. It is entirely correct that the site allocations contained within the new Local Plan set out requirements, where necessary and appropriate, that masterplans or further supplementary planning documents, be prepared following adoption or as part of the delivery and development management processes.</p> <p>For the purposes of clarity, it is highlighted that masterplans and supplementary planning documents must have parent policies, located within an up-to-date local plan. Sequentially, the relevant local plan parent policies must be adopted in advance of any subservient supplementary document or masterplan. For that reason, the Council considers the approach set out under new Local Plan to be sound.</p> <p>Following the adoption of the new Lewisham Local Plan, the Council will be better placed to consider the preparation and production of necessary supplementary planning documents. Subject to the implementation of possible changes to the national planning system this could encompass other forms of supplementary document.</p> <p>The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents. The Council can demonstrate that it has met and</p>	No further actions required in relation to the new Local Plan.

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							<p>Sydenham Green Health Centre (SA5) is already grossly overstretched due to new housing developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. This is classed as urgent, but has not been actioned, and there is no evidence of any plans in place. Any new developments will overwhelm the Health Centre's capacity, so this vital infrastructure needs expanding whether the N4 hub project is confirmed or not. This should be included in the Bell Green Masterplan.</p> <p>Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.</p>	<p>exceeded the legal requirements relating to public consultation and engagement.</p> <p>The Council acknowledges that residents and communities can become frustrated by the development lead-in times required for major strategic infrastructure improvements – such as the proposed Bakerloo Line extension and potential railway station relocations. Infrastructure improvements of this scale and nature are complex and require significant investment. The new Local Plan covers period of fifteen years but, in accordance with national planning policy (NPPF Paragraph 22), can look further ahead to consider the likely timescale for delivery of both growth and associated infrastructure. Within this context it would be premature to consider the early implementation of an alternative strategy which may later prejudice a wider objective. Nevertheless, the Council believes that the new Local Plan and the associated Infrastructure Delivery Plan are sufficiently flexible enough to allow for the consideration of alternative solutions should the Bakerloo Line Extension prove unforthcoming.</p>	
CON006	REP033	Bell Green Neighbourhood Group			3	LSA 02	<p>Response to Policy LSA2 South Area place principle. This policy is not sound in relation to policy LSA2b, due to the lack of a Bell Green Masterplan, robust data about the existing and projected future capacity needed in social infrastructure, and other vital supporting evidence. The lack of these guidelines makes the policy ineffective in what it sets out to achieve. The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to get started without delay.</p> <p>Significant transport accessibility improvements, active travel routes, and the transformation of the retail park into a new mixed-use neighbourhood cannot happen without a masterplan (LSA2b). Waiting for the Bakerloo campaign is delaying good growth in Bell Green. Move the station, and either the mainline service or Overground would improve</p>	<p>The Council does not consider this a matter of soundness. It is entirely correct that the site allocations contained within the new Local Plan set out requirements, where necessary and appropriate, that masterplans or further supplementary planning documents, be prepared following adoption or as part of the delivery and development management processes.</p> <p>For the purposes of clarity, it is highlighted that masterplans and supplementary planning documents must have parent policies, located within an up-to-date local plan. Sequentially, the relevant local plan parent policies must be adopted in advance of any subservient supplementary document or masterplan. For that reason,</p>	No further actions required in relation to the new Local Plan.

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							<p>connectivity and accessibility. It could be used by the Bakerloo line when that arrives. Whatever the future of the line, the new station is vital. This needs to be specified in the proposed Bell Green Masterplan.</p> <p>Bell Green is proposed as a regeneration node, in a Strategic Area for Regeneration. However, its proposed status has been downgraded from a proposed new Town Centre to a Local Centre. * The sites' indicative growth potential is shown for a town centre. The scope of brownfield development at Bell Green will create far more than a small cluster of shops for convenience retail, and a community anchor. It has far more than that already. The LLP seems conflicted about Bell Green's future, and it needs to be clarified before the GLA will consider designating it as an Opportunity Area.</p> <p>*"Commented [NE791]: Latest Retail Impact Assessment and Town Centre Trends Study indicates scope for Local Centre is appropriate – this is reflected in amended policy point C.c above."</p> <p>Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.</p>	<p>the Council considers the approach set out under new Local Plan to be sound.</p> <p>Following the adoption of the new Lewisham Local Plan, the Council will be better placed to consider the preparation and production of necessary supplementary planning documents. The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents. The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement.</p> <p>The Council notes comments made in relation to Bell Green's status as a Local Centre. For clarity, its status as such is a statement of fact and not a retrograding action. The Council acknowledges that following the regeneration of the Area the extent of commercial and retail activity may increase – indeed this is a desirable outcome of sustainable growth. Should that happen, the Council will reassess its status and redesignate accordingly.</p>	
CON006	REP034	Bell Green Neighbourhood Group			3	LSA 03	<p><u>Response to Policy LSA3 Bell Green and Lower Sydenham</u></p> <p>This policy is not sound in relation to Policy LSA3c, due to the lack of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve.</p> <p>We need a Masterplan before the GLA will even consider designating Bell Green as an Opportunity Area. (LSA3 A). Lewisham has not started on a Masterplan (LSA3 B), despite having rejected the designation of a community Neighbourhood Forum that wished to create one. The aspiring Bell Green Neighbourhood Forum, refused designation by Lewisham, started work in 2019, and has had an extraordinarily hostile response from Lewisham, who have refused to have any discussions with us. We have a membership of 80, and despite an overwhelmingly positive local consultation response, Lewisham rejected our Area boundary, and so our Forum. They have since also refused to recognise us as an amenity society, having changed their definition of such groups to being based on the boundary of a</p>	<p>The Council does not consider this a matter of soundness. It is entirely correct that the site allocations contained within the new Local Plan set out requirements, where necessary and appropriate, that masterplans or further supplementary planning documents, be prepared following adoption or as part of the delivery and development management processes.</p> <p>For the purposes of clarity, it is highlighted that masterplans and supplementary planning documents must have parent policies, located within an up-to-date local plan. Sequentially, the relevant local plan parent policies must be adopted in advance of any subservient supplementary document or masterplan. For that reason, the Council considers the approach set out</p>	No further actions required in relation to the new Local Plan.

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							<p>single conservation area. This gives us little confidence in the delivery of such consultation.</p> <p>The missing Masterplan undermines the aspirations expressed in Policy LSA3c; redevelopment of SA1, the Livesey Memorial Hall and gasworks site, is already underway in the planning process; local residents' aspirations for the Masterplan, such as a reconfiguration of the roads and pedestrian access (LSA3 Ce) are being blocked. LSA3 Cg: infrastructure. Provision of sports facilities is of huge concern, given the closure of the Bridge Leisure Centre, and the imminent threat to the sports grounds at the Livesey Memorial Hall (SA1). Sport England, in their r18 response, stress the absence of a robust database. They say that this should include a revised Playing Pitch Strategy, and the Physical Activity and Healthy Lifestyles Strategy. Neither of these documents are published, and the current documents state that the Bridge as a functioning sports hall with swimming pools. We cannot assess Bell Green's sports provision need for new developments without a robust database; this information should have been included for the consultation process. An officer's report made in April 2023 says that '3.1. We are in the process of arranging a steering group meeting to ensure the PPS is still fit for purpose/relevant. This is in relation to changes in the way sport and physical activity are viewed post pandemic.' The Local Plan has been progressed before the necessary documents have been gathered.</p> <p>Sydenham Green Health Centre (SA5) is another piece of community infrastructure already grossly overstretched by recent residential developments. It is proposed to be upgraded for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. Classed as urgent, but has not been actioned, despite being oversubscribed, and incapable of serving the impending new housing developments.</p> <p>Currently there are extreme problems with the electricity grid at Bell Green retail park, with units powered entirely by diesel generators. There are frequent power cuts at the supermarkets, shutting off the fridges and freezers. Existing landowners and developers must cooperate to address the problem in advance of development.</p> <p>Policy LSA3 Dd urges developers to respond positively to heritage assets and their setting, including the Livesey Hall War Memorial and gardens. This should read the (grade II listed) Livesey Memorial Hall, the Livesey Hall War Memorial, the</p>	<p>under new Local Plan Policy LSA 3 to be sound.</p> <p>Following the adoption of the new Lewisham Local Plan, the Council will be better placed to consider the preparation and production of necessary supplementary planning documents. The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents. The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement.</p> <p>In respect of neighbourhood planning, the Council continues to work positively with all bodies across the Borough seeking to establish themselves as Neighbourhood Forums. The processes of identifying a new neighbourhood area and establishing a forum are carried in accordance with The Neighbourhood Planning (General) Regulations 2012.</p> <p>The Council considers that proposed modifications to new Local Plan Policy LSA 3 D d) are not matters of soundness. Whilst the additions may provide additional detail for the reader, they do not necessary in themselves to make it sound. The new Local Plan must be considered in its entirety. As such, new Local Plan Policy HE2 provides an appropriate framework to consider proposals relation to designated heritage assets.</p>	

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							Livesey Hall's Front Wall, and sportsgrounds. NOT gardens. This aspiration is being undermined by the lack of a Masterplan, which is allowing developers to push for tall buildings in close proximity with the Hall, threatening its viability as our Asset of Community Value. It is also undermining the Agent of Change protection of this important community hall, whose existing use of music, live performance and events for the local community is to be undermined by intensive residential development in close proximity. This will lead to conflict between the existing use and the new residents' quality of life. Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.		
CON006	REP035	Bell Green Neighbourhood Group			3	LSA SA 01	<p><u>SA1: Former Bell Green Gas Holders and Livesey Memorial Hall</u></p> <p>SA1's boundary is problematic; two interlocking sites with separate landowners, both currently in the planning system (Apex and Barratt London), plus a third landowner (SGN), currently withholding its land from development. This site allocation policy is not sound, as the omission of the gas pressure station prevents the creation of a coherent street pattern.</p> <p>The southeast corner is designated as an <u>Appropriate Location For Tall Buildings</u>, despite its proximity to the listed structures of the Livesey Memorial Hall, the most sensitive and heritage-rich section of Bell Green. This proposed designation derives from the site-ownership-based boundaries shown at r18. The poor-quality mapping provided for the Tall Buildings zones, shown in opaque orange, obscured this block's isolation from the rest of the Tall Building zone by the Spine Road, which is a public highway, and a major access road. The relevant section of public highway is included in the r19 site boundary, though it cannot be developed. This isolated block has been overlooked by all but the most intense scrutiny.</p> <p>SGN provided Lewisham with a plan, offering their gas pressure station area for development, yet their current public stance is that this area cannot be developed for safety reasons. This causes huge difficulties for the adjoining developments, as cooperation between developers to create a coherent streetscape is non-existent. This piecemeal approach won't build a positive community.</p> <p>The Apex (Livesey Memorial Hall) site includes a strip of land adjoining the 'British Gas Exclusion Zone' SINC extension, which was assessed as being identical habitat to the SINC and</p>	<p>The Council notes the comments made in relation to the fragmented landownership and the possible constraints that this poses to comprehensive redevelopment of the site allocation.</p> <p>The new Local Plan Policy LSA SA 01 seeks to secure a comprehensive redevelopment of this site allocation. The policy wording responds to this by clearly stating that the landowners across the site must work together in partnership and in accordance with a master plan for the wider Bell Green and Lower Sydenham area and including a site masterplan, to ensure appropriate co-location, phasing, and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). It is not unusual for previously developed sites located in urban areas to be in multiple landownerships. This is never in itself a constraint to comprehensive development. The development process remains the appropriate platform for this matter to be resolved in detail. The policy, in conjunction with the new Local Plan Policy DM3, provides effective mechanism to do so.</p> <p>In respect of the possible impact of tall new buildings upon the setting of heritage assets and/ or the visual character and appearance of the wider townscape – the</p>	No further actions required in relation to the new Local Plan.

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							<p>designated in the Parks and Open Spaces strategy 2020-2025 (2020) as natural greenspace (not publicly accessible). Allowing Apex to redevelop this precious natural habitat within a toxic, barren landscape seems inexplicable. The site gradients make the proposed green pathway impossible. The SINC sites were assessed in 2016 and have not been reviewed since. Even in 2016, no site visit was made, and it may have been classified by satellite photography. The report states: "Access to privately-owned sites was not always possible. This was due to a number of reasons includingDense vegetation next to waterbodies at River Ravensbourne and Pool River Linear Park; combination of field survey, aerial photography and professional judgement was used to determine what habitats are likely to be present in areas not accessible by foot. However, in most cases surveying was possible from publicly accessible vantage points (such as from bridges or adjacent roads or open space." (p.38). Given that best practice is that environmental surveys should be renewed after c. 2 years, the status of the SINC extension, or at least the natural greenspace within the Apex site should be reviewed.</p> <p><u>Agent of Change</u>. Policy QD7 Cd. of the LLP says that new noise-sensitive development is situated away from existing noise-generating uses and activities, or, where this is not possible, providing adequate separation and acoustic design measures. The Livesey is a community hall whose existing uses include live performance, music, and events, which generates a great deal of noise. This is not a problem currently, and the arrival of housing close by will create a great deal of ongoing friction. The site boundary doesn't include the necessary no-build zone to protect the existing use of the Livesey. <u>Agent of Change</u> Policy QD7 Cf. says that development must not prejudice the use of playing fields. The Bowls Green of the Livesey Memorial Hall is currently used as an exercise area for the boxing club, including the youth provision of Knives Down, Gloves Up sessions. It has also been used by Brent Knoll school, a nearby special school with very little outside space, none of which is green. Both these schemes, along with other activities for children and young people, will be threatened by child protection concerns with overlooking from housing blocks.</p> <p><u>Conclusion:</u> In order to make this site allocation sound, its Tall Buildings suitability zone needs reviewing, and robust justification given for its designation. there needs to be clarity over the SGN pressure station's future. It must be included in the design for the site layout, so a coherent street layout can be made. There</p>	<p>Council considers that this matter is also appropriately addressed through the development management process. The requirement for site specific masterplan provides an ideal opportunity for development partners and residents to consider how tall new buildings can be incorporated into this site, and the wider townscape. The policies set out in the new Local Plan under Chapter 5 High Quality Design provide a justified and effective mechanism for considering and determining this matter.</p> <p>In addition, the new Local Plan Policy LSA SA 01 sets out how the redevelopment of this site will secure and deliver site intensification, along with the introduction of a range of uses, will bring the land back into active use and support local area regeneration. This will include public open space, good quality design, infrastructure networks and the requirement to remediate land, as necessary, contaminated by historic uses. The Council considers the site-specific requirements set out in policy to be justified and effective in bringing forward the redevelopment of the site.</p>	

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							needs to be a fresh assessment of the British Gas Site Buffer Zone greenspace, and of the greenspace within SA1, omitted from the SINC. The Agent of change aspects of redevelopment must be assessed thoroughly and included in the proposed Bell Green Masterplan. The Bell Green Neighbourhood Group wishes to participate in examination hearing sessions, as site allocation issues have not been addressed by Lewisham, and they continue to refuse to engage with our community group.		
CON006	REP036	Bell Green Neighbourhood Group			3	LSA SA 03	<u>SA3: Sainsbury's Bell Green</u> The proposed Bell Green Masterplan is needed to address the pedestrian safety issues of traffic bypassing the gyratory system, rat running through Sainsbury's carpark. Improvements in connectivity need to be made immediately to pedestrian access routes, which are currently being poorly served.	The Council does not consider this a matter of soundness. It is entirely correct that the site allocations contained within the new Local Plan set out requirements, where necessary and appropriate, that masterplans or further supplementary planning documents, be prepared following adoption or as part of the delivery and development management processes. It is appropriate that future masterplanning exercises consider the detailed design and provision of transport network improvements necessary to support new development. Although it remains inappropriate for new development to make good any existing deficiencies in infrastructure provision, the masterplanning process can nevertheless identify investment opportunities that the Council and its partners can seek to pursue outside of the delivery/ development management process.	No further actions required in relation to the new Local Plan.
CON006	REP037	Bell Green Neighbourhood Group			3	LSA SA 04	<u>SA4: Stanton Square Locally Significant Industrial Site</u> SA4: This site allocation policy is not sound, as its boundary has not been justified robustly. It includes the local heritage asset of the Old Bathhouse, next to the Bell public house. This is a heritage asset which deserves local listing. Built as public slipper baths by Lewisham Council in the end of the 19 th century, it survives with much of its interior intact. It is unthinkable that this should be redeveloped, and no justification is given for its inclusion. There is also no acknowledgement in this allocation of the extent of contamination of the Coventry Scaffolding site, and the wider area from the original gasworks, dating from c. 1850. The	The Council notes the comments made in relation to the new Local Plan Policy LSA SA 04. Locally listed buildings and structures are non-designated heritage assets. The new Local Plan addresses these under Policy HE3 Non-designated heritage assets. An overview of the Borough's non-designated heritage assets is included in the new Local Plan under Schedule 3 Table 21.3. <u>A full list of locally listed buildings and structures is included on the Council's website.</u> The schedule of locally listed buildings is	No further actions required in relation to the new Local Plan.

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							safety practices at this date were considerably worse than later, and it continued in gasworks use for many decades.	<p>periodically updated. The new Local Plan Policy HE3 takes account of this and acknowledges that this process, of local listing, may arise during and be considered through the development management process. The local listing process allows for public engagement. For this reason, the Council maintains that the policy is effective.</p> <p>The Council acknowledges that the policy wording does not make explicit reference to possible on-site contamination attributable to historic uses. It is noted that the uses were operational during the 19th Century. Nevertheless, the new Local Plan includes a range of generic development management policies which the Council can deploy to manage such eventualities. Most notably the new Local Plan Policy SD 1 Ground Conditions provides an appropriate and effective mechanism for addressing this matter should it arise.</p>	
CON006	REP038	Bell Green Neighbourhood Group			3	LSA SA 05	<p><u>SA5: Sydenham Green Group Practice</u></p> <p>Sydenham Green Health Centre (SA5) is already grossly overstretched due to new developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. Classed as urgent, but not actioned, despite being oversubscribed, and the impending housing developments. [Infrastructure Delivery plan].</p>	<p>The Council notes the comments about the apparent capacity of the Sydenham Green Health Centre.</p> <p>The Council is committed to securing appropriate investment in the Borough's infrastructure networks to support planned-for growth. Necessary investment is identified through the new Local Plan and the Infrastructure Delivery Plan. Funding for improvements is secured through several possible sources – through CIL, which primarily serves as top-up funding that can also be used to leaver-in other sources; and other external funds/ grants.</p> <p>The Council acknowledges that communities may aspire to securing the necessary investment early – possibly ahead of new development taking place. This is not possible through the mechanisms currently in place – equally, new development can only contribute</p>	No further actions required in relation to the new Local Plan.

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								towards the infrastructure required in support of growth; it cannot be used to make good existing shortfalls in provision. For these reasons the Council concludes that the new Local Plan is effective, positively prepared and is in accordance with national policy.	
CON006	REP039	Bell Green Neighbourhood Group			3	LSA SA 08	<u>SA8: Land at Pool Court</u> Policy SA8 is unsound, as it is ineffective in what it sets out to achieve. The site is unsuitable, being unfit for human habitation due to high risk of regular flooding at the confluence of two rivers. The quality of life is further degraded by being closely bordered by two railway lines. This site allocation fails to address Lewisham's duty to provide a travellers site; what is needed is rather a stopping site. Travellers have crossed the area for at least four hundred years, still do so several times a year, and need somewhere to stop enroute. A tiny residential site doesn't address this need.	The Council notes the comments made in relation to the new Local Plan Policy LSA SA 08 Land at Pool Court. The Council considers that the site allocation is sound, deliverable, and developable. The site allocation has been assessed through the housing land availability and the sustainability appraisal reporting processes. For those reasons it is considered effective and justified.	No further actions required in relation to the new Local Plan.
CON006	REP040	Bell Green Neighbourhood Group			2	EC 18	<u>EC18 Culture, creative industries and the night-time economy</u> The Bell Green Neighbourhood Group supports the application being made for a Bell Green Cultural Quarter. The Livesey Memorial Hall has a proud history of live performance, music, and community events, along with art exhibitions and cultural activities. Sydenham Library hosts art studios, exhibitions, and workshops. It is the base for Spontaneous Productions shows being shown in Home Park, next door. Whirled Art Studios has set up a complex of studios on Stanton Island, which were rented out immediately. My Aerial Home is a distinguished studio and school for aerial circus disciplines, based on the Trade City retail park, and Glenlyn Academy is a dance and performance school based on the Home Park Estate. Given the EC18 policy for growing the creative industries as a source of employment in Lewisham, further studios would be a positive use of the heavily contaminated land of the Coventry Scaffolding yard. Site of the earliest phase of the Bell Green gasworks, the contamination is likely to be very bad, and would be prohibitively expensive to remediate it to the level acceptable for residential use. The Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions on this matter, as it is vital to the development of employment opportunities in Bell Green.	The Council notes and welcomes the broad support offered by the representation in relation to the new Local Plan Policy EC 18 Culture, creative industries, and the night-time economy. The Council notes the comments made in relation to the new Local Plan Policy LSA SA 01, which seeks the redevelopment of the former Bell Green Gas Holders and Livesey Memorial Hall. The Council considers the policy approach to the redevelopment of this site to be sound. The new Local Plan Policy LSA SA 01 makes provision for the site to be redeveloped for a mix of uses, which could allow for the types of use identified within the representation.	No further actions required in relation to the new Local Plan.
CON006	REP041	Bell Green Neighbourhood Group			4	Schedule 1	Schedule 1. Table 21.1 Livesey Memorial Hall should be added to the list of Local Landmarks.	Local landmarks are a "local" designation. They include both buildings and structures that are non-statutory or designated heritage assets. Their identification is not	Determine whether the identified site has been identified as a local landmark.

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								<p>dependent upon the plan-making process. They can come forward through the conservation area appraisal process or potentially through area masterplanning. The omission of a potential future candidate for local landmark status does not raise an issue of soundness for the new Local Plan.</p> <p>For clarity, it is noted that the Livesey Memorial Hall is a designated heritage asset. As such it's visual character, appearance and wider setting is a consideration for decision-takings and is supported through national policy and new Local Plan Policy HE2.</p>	<p>Subject to this being the case consider its addition to Table 21.1 as a minor modification (omission).</p> <p>Otherwise – no further action required</p>
CON006	REP042	Bell Green Neighbourhood Group			4	Schedule 2	<p>Schedule 2.</p> <p>Table 21.2 Missing from Conservation Area list - The Thorpes Conservation Area.</p> <p>Table 21.2 London Squares – Taymount Rise is missing from the list. Fambridge close is NOT the substitute for the designated Stanton Square. Stanton Square was redeveloped without substitution, and restitution attempts are in process.</p>	<p>The Council acknowledges that the new Local Plan Table 21.2 has omitted the Sydenham Thorpes Conservation Area. The omission shall be address through a minor modification.</p> <p>Local Plans are snapshots in time and are prepared using data that is available during their production. Heritage assets are designated outside of the Local Plan-making process, and it is possible that more current data could become available during the Plan period. This is normal. Nevertheless, the Council will consider this comment and determination whether a designated heritage assessment has been omitted.</p>	<p>Introduce an amendment to Table 21.1 to include Sydenham Thorpes Conservation Area as a minor modification.</p> <p>Determine whether the identified sites are designated heritage assets.</p> <p>Subject to these being a designated heritage asset consider their addition to Table 21.2 as a minor modification (omission).</p>
CON006	REP043	Bell Green Neighbourhood Group			4	Schedule 5	<p>Schedule 5</p> <p>Table 21.5 No mention of any retail existing at Bell Green, or on Perry Hill/Catford Hill.</p>	<p>Schedule 5 Table 21.5 is not intended to be a definitive list of all retail provision available across the Borough. It does identify the district and major shopping areas, and the extent of their primary retail areas.</p> <p>The new Local Plan sets out the Borough's town centre and retail hierarchy under Policy EC 12. Figure 8.2 identifies the location of the Borough's town centres and retail offer on a map. In addition, Table 8.4 provides a list of the network's constituent parts and an explanation of their respective roles and functions.</p>	<p>No further actions required in relation to the new Local Plan.</p>

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CON006	REP044	Bell Green Neighbourh ood Group			4	Schedule 6	Schedule 6 Table 21.6 Cultural Quarters. Please add Bell Green.	<p>The new Local Plan identifies Cultural Quarters through Policy EC18, with the specific objectives of encouraging complementary cultural, community and commercial activities. The new Local Plan Policy EC18 does not currently identify Bell Green as a cultural quarter within this decision-taking context.</p> <p>The new Local Plan Policy EC18 has been informed by supporting evidence and is considered justified. The representation has not provided the examination with any evidence that Bell Green also be considered within the context of new Local Plan Policy EC18.</p>	No further actions required in relation to the new Local Plan.
CON006	REP045	Bell Green Neighbourh ood Group			4	Schedule 11	Schedule 11 Table 21.11 Growth corridor - Perry Hill- Catford Hill not listed but shown on Policies Map.	<p>The Council notes this comment and possible omission to Table 21.11.</p> <p>The purpose of Table 21.11 is to identify the Regeneration Nodes, Growth Nodes and Growth Corridors across the Borough. It is not intended for this Table to provide a complete list of all places located within the Nodes and Corridors. It is unclear to which map the representation is referring. The new Local Plan identifies the Regeneration Nodes, Growth Nodes and Growth Corridors across the Borough at Figure 3.2 and Figure 3.3, the latter in relation to the Spatial Strategy. The Council concludes that the new Local Plan existing mapping clearly identifies the extent of the Nodes and Corridors and no further amendments are necessary.</p>	No further actions required in relation to the new Local Plan.
CON006	REP046	Bell Green Neighbourh ood Group			0	General	<p><u>Conclusions on the LLP consultations for the attention of the Planning Inspector:</u></p> <p>Consultation on the Lewisham Local Plan has been deeply flawed. Regulation 18 was conducted during the pandemic, with limited communication available. Anyone with difficulty accessing online material was excluded from involvement in the consultation. Regulation 19 consultation has taken place simultaneously with one on the Statement of Community Involvement, and constitutional changes to Lewisham Council's planning arrangements have already been approved by the full council, in advance of the SCI consultation's conclusions. Taking all of this into account, further formal</p>	<p>The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents.</p> <p>The suggestion that the formal consultations, at the Regulation 18 and Regulation 19 stages, were in some way impeded by restrictions related to the COVID 19 restrictions and recent elections is not supported by any evidence.</p>	<p>Ensure that the Council's Statement on the discharge of the Duty to Co-operate is published and submitted to the examination.</p> <p>Ensure that Statements of Common Ground with neighbouring local planning authority partners are published and submitted.</p>

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							<p>consultation is needed to achieve a common understanding of all the plans and changes proposed. Therefore, the Bell Green Neighbourhood Group concludes that this consultation is not sound, as the draft Lewisham Local Plan is neither robustly justified nor evidence led. The lack of supporting evidence (including the Bell Green Masterplan, the Playing Pitch Strategy and the Physical Activity and Healthy Lifestyles Strategy) means that it cannot be effective in what it sets out to achieve.</p> <p>In light of these facts, it is clear that the Lewisham Local Plan needs substantial modifications, and the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.</p>	The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement. Evidence is provided through the Regulation 19 Statement of Representations Procedure and the subsequent Regulation 19 Consultation Statement.	
CON007	REP047	Blackheath Society			0	General	<p>Broadly, the Local Plan consultation process was well run, though rather slowly, partly because of covid. Public objections/comments at the reg 18 stage were all tabulated and addressed, though we were disappointed that so many of our comments were not acted on and were marked “No change” (59 times) in the ‘Action’ column of the consolidated responses.</p>	<p>The Council welcomes the broadly positive comments made by the Blackheath Society in relation to the Local Plan-making process.</p> <p>The Council notes the comment that it’s responses to the Regulation 18 representation suggest that it was not acting positively. A key purpose of these response documents is to identify actions required to make the new Local Plan legally compliant and sound. In this respect is possible that no matters of legal compliance or soundness were raised and that consequently no actions were required.</p> <p>The Council remains committed to positive engagement with residents and communities as a key component of the plan-making process.</p>	<p>No further actions required in relation to the new Local Plan.</p> <p>Consider how the Council responds to representations from residents and communities. Where appropriate consider the use of positive messaging that emphasises their contribution to the process.</p>
CON007	REP048	Blackheath Society			0	General	<p>We were also disappointed that none of the suggestions in our comprehensive “Vision for Blackheath” were incorporated into the Local Plan. Instead, we were advised to create our own Neighbourhood Plan, a long, complex process with no assurance of ultimate success. We consider this a missed opportunity to use the Local Plan and its character areas to provide the unique area of Blackheath with a more complete and coherent vision and much-needed additional protections.</p>	<p>The new Local Plan is a Borough-wide planning policy document. The Council considers it to be thorough and comprehensive within the scope of what it needs to achieve to meet the legal requirements and the test of soundness.</p> <p>Neighbourhood plans provide communities with a positive plan-making platform through which they can complement local plan-making and subsequently inform decision-taking. They are intended to</p>	No further actions required in relation to the new Local Plan.

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								<p>facilitate growth and good quality place-shaping. The Council believes that the Society's Vision document could provide a sound basis for the preparation and production of a new neighbourhood plan. Although the process can be long and complex, the Council, as part of its wider plan-making function, is committed to supporting local communities in preparing these plans.</p> <p>As a foot note it is noted that Blackheath has a designated conservation area and associated conservation area appraisal. It is further protected through served Article 4 Directions, which cover specific parts of the conservation areas. As such it is unclear what additional levels of protection could be afforded through either the new Local Plan or a neighbourhood plan.</p>	
CON007	REP049	Blackheath Society			2	QD 04	<p>Height</p> <p>The Council consulted separately and additionally on its Regulation 18 draft policy on tall buildings by issuing a Tall Buildings Study Addendum, so that maximum building heights could be tied more closely to specific area/districts in the borough. We (and other amenity societies) responded with detailed comments, both general and relating to our specific local areas, indicating that we thought the study and proposed requirements were insufficiently detailed, clear, and robust to ensure that tall and large buildings would not have an unacceptably harmful impact on their surroundings and residents.</p> <p>Comments on this consultation were not published or responded to individually, as comments on the full draft Local Plan had been. On the contrary, the first version of the draft Reg 19 Plan was published with some maximum heights increased, without explanation or justification. It was only through strenuous lobbying of individual 2 councillors that this draft was withdrawn just before going forward for Cabinet approval, and then amended to reduce some of the maximum heights that had been increased back down to Reg 18 levels.</p> <p>There was never any public explanation of these changes, nor were the original public comments on the Tall Buildings Study Addendum ever made public or responded to. Whether or not this was statutorily required, we consider that it was a</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 04 Building Heights and the technical evidence used to inform its preparation.</p> <p>The Council notes that the respondent is unhappy with the process used to prepare the technical evidence used to inform policymaking; specifically, the implication that the Council determined not to publish responses to the engagement process that informed the production of the evidence.</p> <p>For clarity, the engagement referred to formed part of the evidence preparation methodology, rather than being part of the plan-making process. Typically, such engagement informs the evidence by addressing technical matters of fact. It is not consultation on the evidence itself – such engagement can take place through the statutory consultation stages. Participants were informed of this, and that the Council would not be responding to individual comments. Participants have an opportunity to comment on the conclusions from the evidence and how</p>	No further actions required in relation to the new Local Plan.

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							significant shortcoming of the process and undermined the Council's commitment to transparency and due process in an area of public interest and concern. We are concerned that some maximum heights, notably in Lewisham town centre, are still too tall, for reasons we have given.	that has informed plan-making through the Regulation 19 Consultation and the subsequent examination process. The Council considers this to be an appropriate mechanism for addressing this matter.	
CON007	REP050	Blackheath Society			2	QD 05	<p>Views</p> <p>The Council consulted amenity societies as long ago as 2018/19 on defining appropriate local character areas and identifying local views for protection. Input on local character areas was incorporated into the draft Local Plan as a result, which is helpful - so long as areas are considered flexible/porous at the borders.</p> <p>However, the views local identified in workshops, particularly of and from Blackheath, have never been discussed further, despite prompting from us, nor have any of them been discussed in the text or incorporated into the list of protected views in Schedule 1: Strategic and local views, vistas and landmarks, despite being marked on Figure 5.11.</p> <p>We have written to the Council (officers and councillors) about this. Blackheath is a major borough open space and asset. It is part of the Greenwich World Heritage Buffer Zone, which largely relies on relevant local authorities (Greenwich and Lewisham) for protection. Sadly, the skyline of the Heath has been increasingly degraded in recent years by excessively tall and/or insensitively designed towers approved and built close to it in Lewisham town centre (Lewisham) and in Kidbrooke (Greenwich).</p> <p>The only view listed in Schedule 1 as relating to Blackheath is described as "Blackheath Central Point to Central London". It is, in fact, not in Blackheath at all, despite sometimes being described as Blackheath Point: it is at the top of Point Hill in the Royal Borough of Greenwich. We have suggested that this should therefore either be removed from the Appendix or re-described and shown as being in the borough of Greenwich and outside Lewisham's control.</p> <p>Another view added at Regulation 19 stage is described as "Greenwich Park to Central London". This is the view from the Wolfe Statue next to the Royal Observatory and it too is in the Royal Borough of Greenwich, not Lewisham. While a very important view, it is not clear why it should be added to Schedule 1 of Lewisham's Local Plan. It is shown without coordinates.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 05 View Management.</p> <p>The Council notes the respondent's suggestions for the identification and designation of additional Views. The Council notes that this matter has previously been raised and responded to through the earlier Regulation 18 consultation. At that stage in the plan-making process the Council stated that it was not proposing to include additional views beyond those included in the Regulation 18 draft Local Plan, which were informed by the Lewisham Characterisation Study. At that point in time the Council highlighted that there would be opportunities to identify and designate additional views through a future review of the local plan. Alternatively this matter could be addressed through a future review of the Conservation Area and its associated appraisal and management plan; or directly by the community through the neighbourhood planning process.</p> <p>The Council considers that the new Local Plan Policy QD 05 is sound, specifically in terms of it being justified; informed by a proportionate and sound evidence base.</p>	No further actions required in relation to the new Local Plan.

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							<p>Both these views, which each overlook several landmarks in central London as well as in Canary Wharf, Greenwich, and Deptford, are already protected by the London View Management Framework as London Panoramas. They were first designated as long ago as 1938. They overlook a very small part of Lewisham borough along its short riverside at Deptford.</p> <p>No other view of or from the Blackheath (Heath or Village) is identified in the Appendix or main Local Plan text as protected, despite several being marked as local views on Figure 15.11 on page 98. Indeed, there are no local views identified anywhere in Blackheath ward, despite it containing one of the borough's major open spaces, with its highly recognizable landmark of All Saints' Church and a unique perimeter skyline which until recently was untouched by tall buildings other than seven nineteenth century church spires.</p> <p>We have sent suggestions for views to be protected, with co-ordinates and photos, to Lewisham Planning. Initially, in May 2021, it said that this would be reviewed as part of the next stages of the Local Plan process. More recently, we were told that there have been insufficient resources available to review and add protected views in the Plan.</p> <p>We consider this a material omission and failure of process, given the length of time since the previous plan and list of views was approved (over 10 years) and the length of time that has elapsed since the Council commissioned ideas for protected views from local amenity societies (over 4 years). We believe that these failures leave a grave risk that the valued skyline of the Heath will be severely and irretrievably damaged over the next few years as the wave of new insensitive very tall buildings (over 75m) approval in Lewisham and Greenwich over the last 5 years is added to, because existing view protection is too weak.</p>		
CON008	REP051		Corina	Poore	0	General	<p>I have to admit that getting any information about the Local Plan has been like getting blood from a stone, but I gather from local gossip that there are plans afoot once again, to destroy our community life by introducing a CPZ. I have heard through gossip that there are holding trails in some areas. What does this mean?</p> <p>Lewisham really needs to really analyse what it wants to become.</p> <p>If it wants to eliminate residential communities and families living here, then it is clear that these local plans will be very</p>	<p>The new Local Plan sets out a clear vision and spatial strategy for the Borough under Policy OL1 Delivering an Open Lewisham. This identifies how good growth will be delivered across the Borough – meeting the needs of existing and future residents and communities. The Council considers the spatial strategy to be sound.</p> <p>The introduction of new controlled parking zones (CPZs) is a legitimate operational intervention. The Council considers that</p>	<p>No further actions required in relation to the new Local Plan.</p> <p>Ensure that colleagues responsible for new CPZ proposals are kept informed of comments.</p>

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							successful. CPZ destroys communities and family life becomes unviable.	CPZs can positively influence car usage, travel patterns and can as part of a package of wider interventions support sustainable growth. The identification and designation of CPZs is a detailed operational matter that the Council pursues as a part of its function as the transport authority. It is not an issue of soundness.	
CON008	REP052		Corina	Poore	2	TR 04	<p>We, on Telegraph Hill., strongly object to and oppose the plans to have CPZ on Telegraph Hill. There are many reasons. I enclose 158 signatures acquired in only 2 days!</p> <p>1. If the council's objective is to get rid of the local families and communities and create a short-term, transient population, dormitory area then your local plan is ideal. People with families cannot manage without having TRADESMEN & WOMEN, without HEALTH WORKERS, CARE WORKERS, DELIVERY PERSONS, AND ABOVE ALL WITHOUT BUSES AND PUBLIC TRANSPORT.</p> <p>2. The local New Cross Bus Garage would not be viable without the free parking on Telegraph Hill. James Clitheroe of the union UNITE at the Bus Garage, who presides over a membership of about 700 workers, has said that the viability of the BUS GARAGE would be at stake. The number of parking spaces on site are far too few to cope with their needs. Their drivers need to arrive at 3 and 4 am to be ready for the first buses. Other than the few who are lucky to be on a night bus route There is no public transport for these drivers and workers to get to work. We all like to have our crack of dawn bus arrive on time. I reiterate, they have NO PUBLIC TRANSPORT to take them to work. They need the free parking on Telegraph Hill. If the Mayor wants the residents of the area to use public transport and leave their cars at home, then we need these buses!</p> <p>3. Families have grandparents and children to care for, vulnerable friends and relatives who they have to visit if they are not to be totally isolated. We need to park for these things.</p> <p>4. Shopping. I, for one, have a large family. Without my car I could not do the weekly shopping. I normally have about 6 large Sainsbury bags to take home. I once tried to take the bus with my supermarket shopping and was told to get off because I was taking up too much space. So shopping and public transport do not go together. Online shopping is expensive and</p>	<p>The new Local Plan sets out a clear vision and spatial strategy for the Borough under Policy OL1 Delivering an Open Lewisham. This identifies how good growth will be delivered across the Borough – meeting the needs of existing and future residents and communities. The Council considers the spatial strategy to be sound.</p> <p>The introduction of new controlled parking zones (CPZs) is a legitimate operational intervention. The Council considers that CPZs can positively influence car usage, travel patterns and can as part of a package of wider interventions support sustainable growth. The identification and designation of CPZs is a detailed operational matter that the Council pursues as a part of its function as the transport authority. It is not an issue of soundness.</p> <p>The introduction of new CPZs is subject to processes that sit outside of plan-making and development management decision-taking. That process provides residents and communities with opportunities to engage and comment upon CPZ proposals. Those proposals are considered on their merits; in that respect residents and communities have opportunities to present evidence that can either justify their position – whether support or objection.</p>	<p>No further actions required in relation to the new Local Plan.</p> <p>Ensure that colleagues responsible for new CPZ proposals are kept informed of comments.</p>

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							<p>they inevitably include substitutes you do not want. It is not viable or practical.</p> <p>5. Shopping parades are dying all over the country ONLY when parking is removed. Our little shopping parade in New Cross Gate, by the New Cross Bus Garage was a huge success. We had two butchers, we had two grocers, two bakers, a small supermarket, a bank (Barclays) and a good Post office. The arrival of the red route coupled with the elimination of the short-term parking on the north end of Pepys Road (for NO good reason) meant people were unable to stay long enough in the bank to take out a mortgage or insurance and the same for the Post Office, making both companies lose money and close down. We also lost two pharmacies as local passing trade was eliminated.</p> <p>6. We want to live in a community-minded borough, where families are prioritized. We want to be able to visit our family without getting a ticket. We want to be able to get a sofa or boiler delivered without being refused because they do not want to carry it for miles from the 'free unloading point' or get a fine. Life cannot be normal or residential with CPZ. It is for childless couples and people who are only there for short periods, often have no need for a car as a result, have no wish or need to know their neighbours or the old lady down the road who needs assistance to get to the shops, all that is irrelevant to these younger residents with no families.</p> <p>7. If that is what Lewisham ASPIRES TO, then I will sell up and leave the area, as, I expect a large number of families I have spoken to. Maybe that is your objective?</p>		
CON009	REP054	Cllr	Liam	Curran	3	LSA 01	<p>I am writing to endorse and support the attached submission by the Bell Green Neighbourhood Forum to the Lewisham Local Plan consultation. I am a member of the Bell Green Neighbourhood Forum.</p>	<p>The Council notes the endorsement of the Bell Green Neighbourhood Forum's representations by the respondent. The Council refers to the comments and actions made in response to the Bell Green Neighbourhood Forum representations.</p>	<p>Further actions as per those identified in response to the Bell Green Neighbourhood Forum representations.</p>

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							Please also accept this as my submission to the Local Plan. I may also wish to make representations as a ward councillor at the examination.		
CON010	REP055	Culverley Green Residents Association				General – Site nomenclature	<p>Please Note: In preparing these documents for public consultation, LBL Planners have not cross referenced the sites referred to in the latter above policy / schedule and plans with their references in the earlier site allocation policies, as needed for easy navigation and reference by the public. Each <i>“Tall Building Suitability Zone”</i> plan in the Proposed Changes to the adopted Policies Map Section 14 should be given a Plan Number, and each site within each plan a reference number which is the same as appears elsewhere in the Local Plan for site allocations. That is BASIC TOWN PLANNING CONSULTATION necessity which has been omitted.</p> <p>Accordingly, for the avoidance of doubt, the two sites in respect of which these CGRA representations are made are as follows: LLP Policies Map: “Catford” plan: within this, the site is the one referenced in the LLP Schedule 12: Tall Building Suitability Zones Table 21.12 as: <i>“Laurence House and Civic Centre with Rushey Green Telephone Exchange : 12 Storeys”</i></p> <p>This site appears in LLP Section 14 Lewisham’s Central Area Figure 14.4 Site Allocation Plan with a number but also a slightly different title as: <i>“Site 19 Laurence House and Civic Centre”</i></p> <p>LLP Policies Map: “Bellingham”: referenced in the LLP Schedule 12 Table 21.12 as: <i>“Ravensbourne Retail Park: 10 – 12 Storeys”</i></p> <p>This site appears in LLP Section 14 Lewisham’s Central Area Figure 14.4 Site Allocation Plan as: <i>“Site 22 Ravensbourne Retail Park”</i></p> <p>Can future consultation please refer to a site consistently with one reference number and name.</p>	The Council notes the comments made in relation the consistency of the site nomenclature. The Council acknowledges that consistent nomenclature can help to ensure that local plans are clear to the reader. Whilst the Council does not consider this to be a matter of soundness, it could consider modifications as part of the Submission process that secure a consistent approach to this matter.	Suggest that the Council explore the identified inconsistencies in site nomenclature and amend accordingly. These can be introduced as minor modifications.
CON010	REP056 a, b, c, d, e and f	Culverley Green Residents Association			3 2	LCA 01 LCA 04 LCA SA 19 LCA SA 22 QD 04 Schedule 12	Lewisham Local Plan (LLP) Proposed submission document – Regulation 19 stage – January 2023 & Proposed Changes to adopted Policies Map – Regulation 19 stage – January 2023 Representations by Culverley Green Residents’ Association, April 2023 Proposed Policy / Policy Map Objection	<p>The Council notes the Culverley Green Residents’ Association comments made in relation to the new Local Plan.</p> <p>The Council understand that the Residents’ Association are seeking to express their concern that the new Local Plan identifies maximum building heights for future developments on the site allocations located with the Lewisham Central Area.</p>	No further actions required in relation to the new Local Plan.

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							<p>Culverley Green Residents' Association (CGRA) is responding to the LB Lewisham consultation on the above documents with an objection to the following:</p> <p>LLP Policy LCA1 - Central Area place principles LLP Policy LCA4 – A21 Corridor LLP Site Allocation 19 - Laurence House and Civic Centre LLP Site Allocation 22 - Ravensbourne Retail Park LLP Policy QD4 – Building Heights LLP Schedule 12: Tall Building Suitability Zones – Table 21:12 LLP Proposed Changes to the adopted Policies Map: Section 14: Tall Building Suitability Zones – for Catford (page 91) & for Bellingham (page 92)</p> <p>Commentary The objection is that the plan is not sound in respect of the following proposed elements: A Group Policies LCA1 Central Area place principles & LCA4 A21 Corridor and associated LLP Site Allocation 19 Laurence House and Civic Centre and LLP Site Allocation 22 Ravensbourne Retail Park & B Group Policy QD4; associated Schedule 12 Table 21:21 and Proposed Changes to the adopted Policies Map Section 14 – Tall Building Suitability Zones (pages 91 and 92). The reasoning, which is set out below, is that:</p> <p>A Group - these proposed policies and allocations fail to give sufficient weight to the Council's legal obligations for the preservation and/or enhancement of heritage assets potentially impacted by the development being promoted, contrary to the requirement of NPPF Paragraph 190 that development plans should set out a positive strategy for the conservation and enjoyment of the historic environment;</p> <p>B Group – this policy and associated schedule and plans setting out the acceptable maximum heights shown, of 12 and 10-12 storeys respectively, are inconsistent with proposed policies HE1, HE2 and LCA 3, (and additionally with LCA1 and LCA4 as they should be worded), because they indicate heights for buildings which have not been assessed in terms of heritage impact as required by NPPF Paragraphs 194 and 195. These require the LPA to take this assessment <i>“into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.”</i></p> <p>Put bluntly, the “A Group” elements fail to adequately incorporate the assessment of the significance of the heritage</p>	<p>The Council consider that the new Local Plan is sound. The approach to growth being clearly set out and consistent through the spatial strategy, site allocations and planning policies.</p> <p>The Council consider that the approach to building heights, as set out in the new Local Plan under Policy QD 04 Building Heights and Lewisham's Neighbourhoods and Places, and site allocations is sound. The new Local Plan's approach is justified in that it is supported by a comprehensive supporting technical evidence base. This identifies tall new building suitability zones across the Borough and the maximum heights that could be considered at specific places. The approach to tall new buildings is effective in that provides opportunities for development industry partners to take master planning and design-led approaches to this matter. The approach is entirely consistent with the London Plan and was prepared in close consultation with the Greater London Authority. Consequently, the Council concludes that the new Local Plan is sound.</p> <p>The Council notes that the comments state that the plan-making process has not considered the possible impacts of tall new buildings upon heritage assets. For clarity, this is not the case. The supporting technical evidence was informed by the evidence relating to the Borough's designated and non-designated heritage assets. That assessment process contributing to the identification of the suitability zones and their capacity to accommodate tall new buildings.</p>	

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							<p>asset (in this case the Culverley Green Conservation Area (CGCA)), and the potential impact of new development in the support for development on Sites 19 and 22, (both within the CGCA and its setting), whilst the “B Group” elements fail to follow the required procedure, and thus put the cart before the horse, in specifying acceptable storey heights for both sites that are considerably greater than their respective 2 – 4 storey contexts, before any assessment of specific proposals. Both of these failures of procedure are contrary to the policies of NPPF Chapter 16 – “<i>Conserving and enhancing the historic environment</i>” This is therefore contrary to NPPF Chapter 3 – “<i>Plan Making</i>”, in particular Paragraph 32 under “<i>Preparing and reviewing plans</i>”, which requires Local Plans to be informed in their preparation by a sustainability appraisal that:</p> <p><i>“should demonstrate how the plan has addressed relevant ... environmental objectives... Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.”</i></p> <p>To be ‘sound’ the plan must, inter alia, be:</p> <p><i>“b) Justified – an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence; d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in [the NPPF] ...”</i></p> <p>Thus the CGRA contend that the absence of proper assessment of the impact of (what the plan itself defines as) “tall buildings” within the CGCA for Site 19 and in the immediate setting of the CGCA in both Sites 19 and 22, on the significance of that heritage asset, does not satisfy the procedure in NPPF Chapter 16. Accordingly, the assignment of acceptable storey heights for new development on both sites is premature and not justified by evidence, and thus the policies, schedules, plans and site allocation text relating to Sites 19 and 22 are unsound as defined in NPPF Paragraph 35 ‘b’ and ‘d’.</p> <p>The CGRA case is strengthened by the other Strategic objectives and policies and their supporting text in the Reg 19 LLP, which do indeed stress the importance of the assessment of impact on the historic environment as follows (CGRA highlighting):</p> <p>Starting with the Strategic objectives, the intention is to manage development to protect, inter alia, existing townscape and heritage:</p>		

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							<p>3.6. Lewisham Local Plan – Strategic objectives F Celebrating our local identity 13 Retain, reinforce and help shape the distinctive character and identity of Lewisham’s neighbourhoods and communities, including ... townscapes, by ensuring that all new development responds positively to the special attributes of its local context – including the cultural, historic, built and natural environment. - and ensure new development is designed, constructed and maintained to a high quality standard. 14 Make the optimal use of land ... and, where appropriate, facilitate the regeneration and renewal of localities within the London Plan Opportunity Areas at ... Catford, ... and through this process manage change to reinforce and build upon local character, whilst delivering transformational improvements to the environment ...</p> <p>15 Set a positive framework for conserving and enhancing the historic environment, and promoting understanding and appreciation of it,. including by working with local communities and community groups, ... to sustain the value of local heritage assets and their setting,</p> <p>The LLP makes clear that the capacity of a site must be established individually having regard to the relevant policies, as highlighted below:</p> <p>13 Lewisham’s neighbourhoods and places Delivering the spatial strategy and meeting local needs 13.7. To help to facilitate Good Growth in Lewisham the Local Plan includes site allocation policies. These are detailed policies for strategic development sites that are critical to the delivery of the spatial strategy. ...</p> <p>13.8. Each site allocation includes information on the development capacity of a site for different types of land uses. The process for identifying sites and the methodology used for setting capacity figures are set out in the “Lewisham Local Plan: Site Allocations Background Paper” – this should be referred for further information. The site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies. ...</p> <p>The over-arching Strategic policy responds to the above Strategic objectives of the Local Plan:</p>		

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							<p>OL 1 Delivering an Open Lewisham (spatial strategy)</p> <p><i>A. The Council will work positively and alongside local communities, and community groups, and other public and private sector stakeholders, to realise the Vision for Lewisham , and to address the strategic objective for ‘An Open Lewisham as part of an Open London’. Good Growth will be delivered in the Borough by:</i></p> <p><i>a. Directing new development to ... Lewisham’s Opportunity Areas of ... Catford ... and carefully managing growth in these locations in response to local character.</i></p> <p><i>d. Directing new development along the A21 Corridor and other strategic Growth Corridors to support growth, along with using the Healthy Streets Approach to enhance the quality of places ...</i></p> <p><i>g. Ensuring all new development proposals follow the design-led approach to make the optimal use of land, respond positively to local distinctiveness (including the historic, cultural, natural and built environment), ...</i></p> <p>In the supporting Explanation, under ‘Growth Corridors’, a caveat has been added with the explanation “<i>Commented [NE40]: Respond to consultation – reflect on the need to carefully manage growth where heritage assets concerned</i>” to read as follows:</p> <p><i>It is acknowledged that some Growth Corridors include Conservation Areas and other heritage assets, or fall within their setting, and therefore growth will need to be carefully managed in a way that responds positively to local historic character.</i></p> <p>The CGRA is pleased to see that its previous response on the A21 Corridor Framework consultation has been acknowledged and taken into consideration in this Reg 19 version of the LLP. The CGRA also supports the approach to site assessment advocated in the Explanation for this over-arching policy, as clearly explained as follows:</p> <p><i>5.3.24. The Local Plan requires all new development to be delivered through a design-led approach. This means that new development must be based on an understanding of the site context and respond positively to the Borough’s local distinctiveness. The use of the design-led approach will help to ensure that the unique and valued features of our neighbourhoods remain at the heart of the spatial strategy, and are fully considered in planning decisions.</i></p>		

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							<p>The CGRA also highlights further LLP strategic policy support of its contention that neither a site-specific allocation nor a policy on building heights should identify acceptable heights on sites within or adjoining conservation areas (including Sites 19 and 22), since in doing so, they cannot take account of the implications of the proposed scale of development on the heritage assets and their settings thereby failing to fulfilling the requirements of the following policies:</p> <p>Part 2: 5: High Quality Design Policy QD1 Delivering high quality design in Lewisham Using the design-led approach</p> <p><i>A. Development proposals must follow a design-led approach to contribute to delivering high quality, inclusive, safe, healthy, liveable and sustainable neighbourhoods in Lewisham. This requires the consideration of design options at the early stage of the development process informed by an understanding of the site and its local context, including through effective engagement with the local community. These design options should then be used to determine the most appropriate form of development that responds positively to the local context, along with the optimal use of land to support the delivery of the spatial strategy for the Borough.</i></p> <p>Distinctive and valued places <i>B. Development proposals must demonstrate an understanding of the site context and respond positively to Lewisham's local distinctiveness by providing for buildings, spaces and places that reinforce and enhance local character. This includes the special and distinctive visual, historical, environmental, social and functional qualities of places that contribute to local character, identity, sense of community and belonging</i></p> <p>.</p> <p><i>C. To successfully respond to local distinctiveness development proposals must be designed to address:</i></p> <p><i>a. Natural features including trees, landscape, topography, open spaces and waterways;</i> <i>b. The prevailing or emerging form of development (including urban grain, building typology, morphology and the hierarchy of streets, routes and other spaces);</i> <i>c. The proportion of development (including height, scale, mass and bulk) within the site, its immediate vicinity and the surrounding area;</i> <i>d. Building lines along with the orientation of and spacing between buildings;</i></p>		

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							<p><i>e. Strategic and local views, vistas and landmarks;</i> <i>f. Townscape features;</i> <i>g. The significance of heritage assets and their setting; and</i> <i>h. Architectural styles, detailing and materials that contribute to local character; and</i> <i>i. Cultural assets.</i></p> <p>Part 2: 6: Heritage Policy HE1 Lewisham’s historic environment <i>The Council will seek to preserve or enhance the value and significance of Lewisham’s historic environment and its setting by:</i> <i>d. Requiring that heritage meaningfully informs the design of development proposals and only supporting development that preserves or enhances the significance of heritage assets and their setting;</i> <i>f. Requiring development proposals to demonstrate that all reasonable measures have been investigated to avoid harm to heritage assets;</i></p> <p>Policy HE2 Designated heritage assets Conservation Areas <i>B. Within Conservation Areas, development proposals will only be supported where they:</i></p> <p><i>a. Preserve or enhance the special character and appearance of the CA having particular regard to:</i> <i>i. Townscape, buildings, roof lines and the relationships between buildings;</i> <i>ii. Scale, form, ...</i></p> <p><i>G. Development proposals on sites adjacent to a CA must not have a negative impact on the setting or significance of the CA;</i></p> <p>Part 3: 14: Lewisham’s Central Area Policy LCA3 – Catford major centre and surrounds <i>D Development must be designed to provide for an appropriate transition in scale, bulk, mass, height and character from residential neighbourhoods around the centre, ...</i> <i>F Development proposals must respond positively to the historic and cultural character of the town centre and its surrounds whilst preserving or enhancing the significance of heritage assets, including by:</i> <i>b. Addressing the relationship of new development with the Culverley Green Conservation Area to the south.</i></p> <p>The CGRA contends that all the above quoted strategic policies demonstrate that identification of acceptable storey</p>		



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							<p>heights for Sites 19 and 22 via policies / schedules / plans / site allocations in the LLP is simply not appropriate prior to a detailed assessment of the impact of a specific scheme on sites 19 or 22, in terms of, inter alia, the significance of the CGCA and its setting. This strengthens the CGRA's claim that the elements to which the objection relates fail to accord with the other proposed strategic policies and national policy as set out in the NPPF.</p> <p>CGRA contends that the Strategic objectives and policies quoted above that require schemes to demonstrate that they have been designed to preserve or enhance the significance of the CGCA and its setting do appropriately fully reflect the requirements of NPPF Chapter 16. Thus they justify the CGRA's claim of unsoundness of the above quoted policies / schedules / plans / site allocations to which objection is made, covering new developments on Sites 19 and 22, given their inadequate acknowledgement of appraising the impact of 10 – 12 storey development on the significance of the CGCA heritage asset.</p> <p>Comments on the elements of the LLP the subject of this objection In summary, specific comments by CGRA on the policies and other instruments pertaining to Sites 19 and 22 are as follows</p> <p>LLP Policy LCA1 – Central Area place principals Part D - ..."sensitively designed and high quality development on small sites will be supported where this responds positively to the area's local and historic character." CGRA note that the policy is unsound since there is no equivalent section covering large sites, which is certainly relevant to Site 22, if not Site 19 also. Furthermore, CGRA consider this single reference to historic character in the entire policy to be inadequate to highlight the importance of the LPA's requirement to at least protect the CGCA's character via, inter alia, undertaking a development height and massing assessment, and to reflect the requirements of the other policies quoted above which require proper consideration of heritage assets.</p> <p>LLP Policy LCA4 - A21 corridor CGRA consider that the policy is unsound in that it makes no reference to the need for proposed development to ensure the protection or enhancement of the CGCA, nor any cross-reference to the requirements of Policy LCA 3. Policy QD 4 Building heights CGRA consider the following part of this policy to be unsound:</p>		


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							<p>C. Within those locations identified as appropriate for tall buildings, the maximum height of buildings shall not normally be more than:</p> <p>c. 39.2 meters (12 storeys) to 64.8 meters (20 storeys) in Catford f. 32.8 meters (10 storeys) to 39.2 meters (12 storeys) in Bellingham and Lee Green</p> <p>The contention that it is unsound is not only explained above, as being contrary to the requirements of other policies, but is reinforced by its incompatibility with the requirement of the following part of Policy QD4:</p> <p>D. Development proposals for tall buildings will only be permitted where they are in a Tall Building Suitability Zone, align with the appropriate height ranges set out above and it is demonstrated that the development:</p> <p>g. Will preserve or enhance the significance of heritage assets and their setting;</p> <p>As already explained, the reason why CGRA believe QD4 Part C is unsound is that the process of establishing the appropriate maximum height for development on a site that impacts on the setting of a conservation area must be through a design-led assessment informed by a heritage assessment. There is a fundamental difference between the impact of a tall building on the other considerations of QD4 D, such as ‘a’ – <i>will contribute to the delivery of the spatial strategy for the Borough</i>, versus this matter of heritage impact, for which the NPPF para 198 sets out a specific requirement. In short, whereas for some sites identified in the local plan for regeneration at a high density, it may be appropriate to indicate a maximum height, based on townscape, views and other issues, such an approach is inappropriate for sites within or adjacent to conservation areas. For this reason, the policy is unsound, being inadequately justified, not effective,(as issues could arise in delivery of schemes in compliance with this policy), and inconsistent with national policy.</p> <p>For the reasons relevant to QD4, the associated schedules and plans are also unsound in respect of Sites 19 and 22.</p> <p>CGRA URGES LB LEWISHAM TO REMOVE ALL REFERENCE TO ACCEPTABLE STOREY HEIGHTS EVEN IF INDICATIVE IN RESPECT OF THE SITES WITHIN THE CULVERLEY GREEN CONSERVATION AREA AND ITS SETTING.</p> <p>Peter Luder BA MUP MRTPI Culverley Green Residents’ Association</p>		

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CON010	REP057	Culverley Green Residents Association				Policy QD 04 Building Heights	<p><u>Policy QD 4 Building heights</u> CGRA consider the following part of this policy to be unsound: Within those locations identified as appropriate for tall buildings, the maximum height of buildings shall not normally be more than: c. 39.2 meters (12 storeys) to 64.8 meters (20 storeys) in Catford f. 32.8 meters (10 storeys) to 39.2 meters (12 storeys) in Bellingham and Lee Green</p> <p>The contention that it is unsound is not only explained above, as being contrary to the requirements of other policies, but is reinforced by its incompatibility with the requirement of the following part of Policy QD4:</p> <p>D. Development proposals for tall buildings will only be permitted where they are in a Tall Building Suitability Zone, align with the appropriate height ranges set out above and it is demonstrated that the development: g. Will preserve or enhance the significance of heritage assets and their setting;</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 04 Building Heights.</p> <p>The Council consider that the approach to building heights, as set out in the new Local Plan under Policy QD 04 Building Heights and Lewisham's Neighbourhoods and Places, and site allocations is sound. The new Local Plan's approach is justified in that it is supported by a comprehensive supporting technical evidence base. This identifies tall new building suitability zones across the Borough and the maximum heights that could be considered at specific places. The approach to tall new buildings is effective in that provides opportunities for development industry partners to take master planning and design-led approaches to this matter. The approach is entirely consistent with the London Plan and was prepared in close consultation with the Greater London Authority. Consequently, the Council concludes that the new Local Plan is sound.</p>	No further actions required in relation to the new Local Plan.
CON010	REP058	Culverley Green Residents Association			3	LCA 01 Central Area Place Principals	<p><u>LLP Policy LCA1 – Central Area place principals</u> Part D - ..."sensitively designed and high quality development on small sites will be supported where this responds positively to the area's local and historic character."</p> <p>CGRA note that the policy is unsound since there is no equivalent section covering large sites, which is certainly relevant to Site 22, if not Site 19 also. Furthermore, CGRA consider this single reference to historic character in the entire policy to be inadequate to highlight the importance of the LPA's requirement to at least protect the CGCA's character via, inter alia, undertaking a development height and massing assessment, and to reflect the requirements of the other policies quoted above which require proper consideration of heritage assets.</p> <p><u>LLP Policy LCA1 – Central Area place principals</u> Part D - ..."sensitively designed and high quality development on small sites will be supported where this responds positively to the area's local and historic character." CGRA note that the policy is unsound since there is no equivalent section covering large sites, which is certainly relevant to Site 22, if not Site 19 also. Furthermore, CGRA</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA 01 Central Area Place Principals.</p> <p>The Council notes that the respondent considers Policy LCA 01 to be unsound as it does not include a section covering large sites. It is assumed that this relates to the effectiveness of the policy. The Council advises that the new Local Plan must be read and considered in its entirety. Within this respect the wider new Local Plan sets out the general-purpose planning policies under which new development proposals for large sites can be considered. For that reason, the Council considers the new Local Plan to be effective and sound.</p>	No further actions required in relation to the new Local Plan.




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							consider this single reference to historic character in the entire policy to be inadequate to highlight the importance of the LPA's requirement to at least protect the CGCA's character via, inter alia, undertaking a development height and massing assessment, and to reflect the requirements of the other policies quoted above which require proper consideration of heritage assets.		
CON010	REP059	Culverley Green Residents Association			3	LCA 04 A21 corridor	<p>LLP Policy LCA4 - A21 corridor CGRA consider that the policy is unsound in that it makes no reference to the need for proposed development to ensure the protection or enhancement of the CGCA, nor any cross-reference to the requirements of Policy LCA 3.</p> <p>LLP Policy LCA4 - A21 corridor CGRA consider that the policy is unsound in that it makes no reference to the need for proposed development to ensure the protection or enhancement of the CGCA, nor any cross-reference to the requirements of Policy LCA 3.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA 04 A21 Corridor.</p> <p>The Council notes that the respondent considers Policy LCA 04 to be unsound as it does not make specific reference to the protection and enhancement of heritage assets – specifically the Culverley Green Conservation Area. The Council advises that the new Local Plan must be read and considered in its entirety. Within this respect the wider new Local Plan sets out the planning policies that consider the impact of new development on designated and non-designated heritage assets. For that reason, the Council considers the new Local Plan to be effective and sound.</p>	No further actions required in relation to the new Local Plan.
CON011	REP060		Dionne	Costley	3	LSA 03	<ul style="list-style-type: none"> There is no proposed Air Quality Focus Area proposed for the Bell Green area although it sits along a corridor of Air Quality Management (Ribbon) - see SD6 There is no mention of a proposed Bell Green station (whether it be part of national rail or London Underground / TfL) - see TR1. There is no mention of the removal of the Bell Green Gyratory - See TR1. There is no explicit mention of the above points with regards to LSA3 nor the re-wilding of the Pool River in Southend Park. 	<p>The Council notes the comments made in relation to the new Local Plan Policy LSA 03 Bell Green and Lower Sydenham.</p> <p>The Council suggests that the new Local Plan be read and considered as a whole. The matters raised by this representation addressed through general Borough-wide planning policies.</p> <p>Policy SD 06 Improving Air Quality sets out the Borough-wide approach to this matter. Figure 11.2 Air Quality Management Areas (AQMA) and Air Quality Focus Areas (AQFAs) identifies the places and areas that the policy focuses upon. This includes the AQMA (Ribbon) that follows the alignment of A205 (South Circular)), the A21 and the A212. The Council does not consider the current absence of an AQFA to be a matter of soundness. The designation of new AQFAs can occur outside of the plan-making process and</p>	No further actions required in relation to the new Local Plan.

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								<p>they will be identified elsewhere (in addition to the new Local Plan) for the benefit of decision-taking.</p> <p>The comments made in relation to two specific transport network improvements are noted. These are not scheme identified in the new Local Plan. As set out above, the identification of infrastructure investment can take place outside of the plan-making process – as part of the Infrastructure Delivery Plan. Consequently, should these schemes be justified, they can still come forward.</p> <p>Equally, green infrastructure/ biodiversity improvements can also come forward outside of the plan-making process. For these reasons, the Council concludes that the Plan is sound.</p>	
CON012	REP061		Dianna	Cashin	3	LSA SA 03	<ol style="list-style-type: none"> 1. It is currently a well used retail park offering a wide variety of choice and local employment. To take this recognised success away from residents is a retrograde step. A few small shops as indicated will not be able to provide the same choice and convenience currently enjoyed at a time when all the impetus should be to achieve a '15 minute city'. 2. Were the development to go ahead the proposed height of the residential blocks is too high. A height of 4-6 storeys is the maximum to maintain a residential sky line. 	<p>The Council notes the comments that appear to be refer to the new Local Plan Policy LSA SA 03 Sainsbury's Bell Green.</p> <p>For clarity, the new Local Plan Policy LSA SA 03 seeks to secure the comprehensive redevelopment of this site allocation for a mix of uses comprised of compatible residential, commercial, main town centre and community uses. The Policy anticipates that the redevelopment of the site will secure between 500 – 1300 new homes, over 2500 sqm of employment floorspace and over 11000sqm of town centre use floorspace.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has</p>	No further actions required in relation to the new Local Plan.

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								<p>informed the plan-making process. This is reflected by the new Local Plan's spatial strategy, site allocations and planning policies.</p> <p>The new Local Plan's approach to tall new buildings is considered sound – being based on a comprehensive evidence base, providing an effective decision-taking platform and being consistent with the London Plan.</p>	
CON013	REP062	Downham Dividend Society Community Land Trust Ltd			3	LSA 01	<p>This submission arises out of the partnership work between Downham Dividend Society CLT Ltd and 7 Fields PCN. Dr. Helen Tattersfield, the 7 Fields PCN clinical director has dedicated over 3 decades of her professional life to the health and well being of the Downham community. The PCN funded the following action research projects</p> <p>This submission arises from numerous public engagement activities developed in partnership between the Downham Dividend Socieity and 7 fields Primary care network.</p> <p>Examples of the work include:</p> <p> Downham final report 28-9-2022.pdf</p> <p>T</p> <p> FULL Downham Land Use Report.pdf</p> <p>https://youtu.be/qguxujq1Kw4</p> <p>https://vimeo.com/732795269/a6fcc9eeb4</p> <p>https://www.facebook.com/greenwomanoasisproject/?view_public_for=294304178135955</p> <p>which contributed to this submission:</p> <p>This submission argues that the Lewisham Local Plan is unsound' in its failure to:</p> <ul style="list-style-type: none"> recognise the unique characteristics of the Downham communities. Downham has a diverse population, but community relations have been complicated over the years <p>https://www.theguardian.com/cities/2019/sep/09/we-had-to-fight-the-nf-but-can-londons-first-black-housing-co-op-survive-latest-threat . There is anecdotal evidence of increasing racial anti social behaviour with individual residents being told that '</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LSA 01 South Area place principles.</p> <p>The Council notes the specific comments made in relation to the new Local Plan's recognition of the Downham communities; the opportunities for developing a strategic asset-based approach towards public health, community wealth building and climate change mitigation; and the opportunities for enhancing green and blue infrastructure. The comments on these matters suggest that the new Local Plan is unsound as it fails to consider them within the Lewisham South Area context. The Council challenges this suggestion and considers that the new Local Plan does address these matters and consequently is sound.</p> <p>The Council considers that the new Local Plan is justified as its preparation has been informed by a comprehensive technical evidence base and through engagement with residents and communities. This includes data on the demographic composition of the places and areas across the Borough. The Council considers that the scale and scope of the technical evidence and engagement is proportionate with that necessary for the new Local Plan.</p> <p>In respect of maintaining and enhancing public health infrastructure networks, the new Local Plan functions alongside the Borough-wide Infrastructure Delivery Plan.</p>	No further actions required in relation to the new Local Plan.

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							<p>are getting all the housing' and a area.</p> <p>More research is needed to identify how widespread these incidences are.</p> <ul style="list-style-type: none"> take a strategic asset based approach to maximise the potentially significant public health, community wealth building and climate change contribution of its outstanding green and blue spaces. give due consideration to how a strategic approach to the Downham green spaces can significantly tackle the race health inequalities identified within the BLACHIR report which suggest with the increasing number of BAME members in Downham as set out in the Lewisham Laboratory incorporating the recent census figures the concentrations of health inequalities are likely to be increasing. to develop an asset based strategy to maximise the public health, community wealth building and climate change contributions of the Green and Blue spaces that impact 7 fields PCN as set out in <p> FULL Downham Land Use Report.pdf https://vimeo.com/732795269/a6fcc9eeb4</p> <ul style="list-style-type: none"> Align with national policy framework on sustainable development through developing a health focused supplementary planning document to consider: a trauma informed approach to the regeneration of Downham's underinvested Green and Blue spaces. the best investment vehicle for the Green and blue spaces in and around Downham maximise the opportunities to strengthen the social capital of the area Be ambitious in its Parks and Open Spaces strategy Parks and Open space strategy 220 - 2025 sets out relatively modest interventions. Downham forms part of the Southern sub-area (see pp 52-54). The following extract of the Improvement Strategies recommended for existing and future projects lacks a focus on considering the investment opportunities that e.g. a health focused Parks Trust could attract as set in the Downham Green space land use report: <ul style="list-style-type: none"> <i>The parks of a 'fair' quality, named above, should be prioritised for improvement.</i> <i>To improve play provision for residents within the area of deficiency in access to Playspace, a 'pocket park' should be considered for inclusion within the area of deficiency. In addition,</i> 	<p>This seeks to identify and prioritise investment in infrastructure networks. The Council continues to work closely with its infrastructure partners, both internal and external, to ensure that investment complements and supports planned-for growth – and meets the needs of the Borough's existing and future residents. The Council considers this a sound approach.</p> <p>The Council acknowledges the valuable contribution that green infrastructure and open spaces networks can make towards health and well-being. The new Local Plan's spatial strategy sets out how these networks (and other infrastructure) will contribute, function, and evolve through the plan period. The area-specific spatial approaches (for the Borough's neighbourhoods and places), their associated site allocations, and the new Local Plan's planning policy (specifically Policies GR1 – GR7) provide a framework for delivery. The Council concludes that this is a sound approach.</p> <p>The Council recognises the importance of these matters to Downham's residents and communities. The Council considers that the new Local Plan through its spatial strategy (Policy OL 01); the approach to Local South Area (Policies LSA 01 – LSA 04); and its associated site allocations (Policies LSA SA 01 – LSA SA 14) as a justified and effective mechanism for securing new growth and infrastructure to meet demand. The new Local Plan identifies the South Area, which includes Downham, as a Strategic Area for Regeneration. It seeks to coordinate investment and supports targeted responses by a wide range of stakeholders to address deprivation and the social, economic, and environmental barriers to opportunities experienced by communities in this area.</p>	

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							<p><i>facilities within the nearest park – Durham Hill –should be improved.</i></p> <ul style="list-style-type: none"> • <i>Improving walking and cycling access</i> • <i>Signage and other walking and cycling infrastructure are recommended for the spur of The Waterlink Way connecting The Waterlink Way to Beckenham Place Park.</i> • <i>An additional bridge across the Catford Loop Railway Line between Beckenham Place Park and Summerhouse Fields should be considered.</i> • <i>Access from the Areas of Deficiency in Access to Play in the east of the southern sub-area to the nearest play facilities at Durham Hill should be improved.</i> <p><i>A health focus SDP for the area green and blue spaces of the area is likely to increase the soundness of the Local Plan through:</i></p> <p><i>increase alignment with the Council's stated aims of the POS' strategy and Local Plan through creating a clearer focus on how to maximise the PH, CWB and CC outcomes through Downham's outstanding green and blue assets In setting out the strategy, we are stressing the importance we place on our desire to involve both partners and the whole community in shaping the future of our open space. We recognise that open space affects the lives of almost everyone that lives and works in the borough, and believe that sustainable management and community involvement of our open spaces offers considerable potential for helping to make Lewisham the best place to live, work and learn.</i></p> <p>These highlighted emphases of political ambition are very much reflected in the latest Regulation 19 draft Local Plan, and ought therefore to be seen as a clear alignment of both the Council's plan objectives with its other policy programmes; albeit at a boroughwide level, with very little focus on HWB, CWB and CC outcomes needing to be achieved in specific places.</p> <p>attract the significant funding available (e.g. https://www.ukri.org/opportunity/collaborative-community-research-to-tackle-health-inequalities/) for pilots and research projects to address the knowledge gaps identified in the BLACHIR report that impact the emerging Downham communities as well as producing a set of community indicators that can provide the evidence based for effective regeneration interventions</p>		

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							<p>develop a partnership which builds a consensus on the evidence based solutions most likely tackle the social determinants of ill health identified by Marmot maximise the climate change contribution opportunities Downham's green spaces offer for example most of Downham's housing stock is approaching 100 years of age and there is significant scope for ground source energy and battery storage solutions which are yet to be explored. This submission arises out of the partnership work between Downham Dividend Society CLT Ltd and 7 Fields PCN. Dr. Helen Tattersfield, the 7 Fields PCN clinical director has dedicated over 3 decades of her professional life to the health and well being of the Downham community. The PCN funded the following action research projects</p> <p> Downham final report_ 28-9-2022.pdf</p> <p> FULL Downham Land Use Report.pdf</p> <p>https://youtu.be/qguxujq1Kw4</p> <p>https://vimeo.com/732795269/a6fcc9eeb4</p> <p>19th Century maps of the area ascribe the name Mount Misery to Downham. When Downham was being constructed over 100 years ago the proposed new communities were opposed by both Lewisham wards of Hilly Fields and the London Borough of Bromley. The hostility and institutional blindness to the community needs is reflected in the Valeswood wall built to prevent Downham residents from walking to Bromley town centre.</p> <p> class wall downham.pdf</p> <p>The high levels of deprivation identified within the Lewisham laboratory and increasing concentration of the social determinants of ill health: https://www.instituteofhealthequity.org/resources-reports/build-back-fairer-the-covid-19-marmot-review Means that the existing community faces another wall of social exclusion through the cost of healthy leisure activities.</p> <p>Downham was built on garden city standards when the public health impact of housing was in the foremost thinking of policy makers. The national planning policy framework adopted the UN sustainability goals and the maximisation of the public health impact of the Downham's outstanding green and blue assets need to become a focus of the Lewisham Plan. The Trust's strategy of Downham health through sport leisure and nature seeks to create a healthy garden city approach to</p>		

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							<p>maximising the public health impact through a social prescription model of health and well being:</p> <p>https://youtu.be/gguxujq1Kw4</p> <p>https://www.facebook.com/downhamhealththroughsport/?page_id=1015845454545454&eav=AfZfVNPhbiFTESYyk5XJC7fx2RExtQBSR6oXa4wXQbK4_9dOH-ZG57P_4IVCg2VgNto&_r</p> <p>The Lewisham Plan current lacks a focus on the significant health and community wealth contributions the green and blue spaces can make to tackling the social determinants of ill health identified by Marmot.</p> <p>There is no recognition of how a health focused SPD and Parks Trust investment vehicle can maximise the public healthcommunity wealth building and climate change contributions of over 300 acres of publicly owned green and blue space. E.g Discussions around securing investment into the https://www.facebook.com/greenwomanoasisproject/?view_public_for=294304178135955 began with the then assistant director of education Aileen Buckton 22 years ago. In Nov 2019 the Lewisham Mayor along with senior officers met with the trust and agreed to support the Green Woman Oasis Project up to feasibility stage. It was made very clear that there was no agreement to transfer the ownership of the publicly owned assets. However institutional inertia has meant that an asset of outstanding natural beauty has remained unavailable to the Downham community and its potential as a tourist attraction is untapped, despite Heritage Lottery inviting the Trust to a seminar to encourage a bid pre-pandemic.</p> <p>A health focused SPD in combination with an investment vehicle such as a Parks Trust offers the Downham communities an evidence based approach aligned with national policy to maximise the public health, community wealth building and climate change contributions of its magnificent but underinvested green and blue spaces.</p>		
CON014	REP063		Edward	Stern	3	LSA 03	<p>I am a local resident, living just up Perry Hill from the proposed development. I strongly agree with the Bell Green Neighbourhood Group's response to r19 LLP and consider the criticism to the plans entirely valid.</p> <p>The LLP refers to developers following the Bell Green masterplan, which does not exist. It appears to be based on baseless assumptions about the Bakerloo Line expansion. It lacks the most basic data about sports facilities and public</p>	The Council does not consider this a matter of soundness. It is entirely correct that the site allocations contained within the new Local Plan set out requirements, where necessary and appropriate, that masterplans or further supplementary planning documents, be prepared following adoption or as part of the	No further actions required in relation to the new Local Plan.

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							<p>transport. Critically it lacks justification for building such high-density high-rise development in an area that is and will continue to be so poorly served by public transport, let alone building a 15 storey tower block right next to the Livesy Memorial Hall. It does not justify its case, and does not appear legally sound. I urge you to reject the plan as it stands and require the developers to do the work required of them. Frankly their proposal appears shoddy, and reflects poorly on them and on any authority which would wave through such a plan.</p> <p>I'm not at all opposed to development of the site - there's a genuine need for more housing, and a great deal of potential improvement for the area. But the plan as it stands just isn't good enough.</p>	<p>delivery and development management processes.</p> <p>For the purposes of clarity, it is highlighted that masterplans and supplementary planning documents must have parent policies, located within an up-to-date local plan. Sequentially, the relevant local plan parent policies must be adopted in advance of any subservient supplementary document or masterplan. For that reason, the Council considers the approach set out under new Local Plan Policy LSA 3 to be sound.</p> <p>Following the adoption of the new Lewisham Local Plan, the Council will be better placed to consider the preparation and production of necessary supplementary planning documents. The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents. The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement.</p> <p>In respect of neighbourhood planning, the Council continues to work positively with all bodies across the Borough seeking to establish themselves as Neighbourhood Forums. The processes of identifying a new neighbourhood area and establishing a forum are carried in accordance with The Neighbourhood Planning (General) Regulations 2012.</p> <p>The new Local Plan Policy LSA SA 01 seeks to secure a comprehensive redevelopment of this site allocation. The policy wording responds to this by clearly stating that the landowners across the site must work together in partnership and in accordance with a master plan for the wider Bell Green and Lower Sydenham area and including a site masterplan, to ensure appropriate co-</p>	

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								location, phasing, and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). The development process remains the appropriate platform for this matter to be resolved in detail. The policy, in conjunction with the new Local Plan Policy DM3, provides an effective mechanism to do so.	
CON015	REP064		Eleanor	Keech	3	LCA SA 12	<p>I wish to contribute to the consultation on Lewisham's local plan, specifically the Ladywell Playtower development.</p> <p>I wish to object to this development. The residential properties to be built at the back of the development will severely impede my rights to light and privacy. It will stop daylight from entering my flat. There has been a light study but I and other residents at St Peters believe this is flawed and request an independent light study be carried out to mark the true difference on the light for St Peters residents the development will make.</p> <p>Also my right to privacy will be compromised by having residential properties built so close to mine. The residential development will be breaking recommended levels of proximity by being built so close to our flats. Residents of the new development will be able to see right into my flat, at such close proximity.</p> <p>For these reasons I cannot agree to the building of residential properties at the back of the Ladywell Playtower development.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 12 Ladywell Play Tower.</p> <p>The new Local Plan Policy LCA SA 12 seeks the redevelopment of this site to secure a mixed-use development comprising main town centre, community, and residential uses. The redevelopment of the site will also secure the restoration and enhancement of the Grade II listed Ladywell Baths. The Council highlights that the latter building is currently on the Heritage at Risk Register. The redevelopment of the site provides a viable opportunity to restore the building and return it to an appropriate community use. The Council considers this approach to be sound.</p> <p>The Council notes the comment that redevelopment will harm the amenity enjoyed by neighbouring residents. This is an important consideration – however, it is beyond the scope of plan-making. Nevertheless, it is a matter that will be explored through the Council's decision-taking responsibilities.</p>	No further actions required in relation to the new Local Plan.
CON016	REP065		Elizabeth	Carlisle	3	LSA 03	<p>The proposed high rise development of Bell Green is poorly thought out . This area does not have the infrastructure to sustain such a development. It is well known that high rise living does, not make a community I think the planners need to look at the housing needs no profit</p>	<p>The Council notes the comments made in relation the new Local Plan Policy LSA 03. The Council maintains that the new Local Plan's spatial strategy, site allocations and planning policy provide a sound for place-shaping the delivery of new growth and supporting infrastructure networks over the plan period.</p> <p>The Council is committed to securing appropriate investment in the Borough's</p>	No further actions required in relation to the new Local Plan.

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								<p>infrastructure networks to support planned-for growth. Necessary investment is identified through the new Local Plan and the Infrastructure Delivery Plan. Funding for improvements is secured through several possible sources – through CIL, which primarily serves as top-up funding that can also be used to leaver-in other sources; and other external funds/ grants.</p> <p>The Council acknowledges that communities may aspire to securing the necessary investment early – possibly ahead of new development taking place. This is not possible through the mechanisms currently in place – equally, new development can only contribute towards the infrastructure required in support of growth; it cannot be used to make good existing shortfalls in provision.</p> <p>For these reasons the Council concludes that the new Local Plan is effective, positively prepared and is in accordance with national policy.</p>	
CON017	REP066		Ewa	Szczepania k	3	LCA SA 12	<p>Thank you for another consultation option regarding potential Ladywell Play Tower development. I strongly object to the development.</p> <p>Myself and few neighbours from St Peters Gardens, as well as other blocks and business close by met with architect as well as Councillors to discuss the matter and even invited everyone to our homes so it's apparent that there is a massive lighting issue.</p> <p>The BRE Guidelines where it states, "the guidelines given here are intended for use for rooms in adjoining dwellings where daylight is required, including living rooms, kitchens and bedrooms.", however, the guidelines continue to comment, "The guidelines may also be applied...where occupants have a reasonable expectation for light." Therefore, it can be concluded from the above statements from the BRE that the room should be assessed under the BRE Guidelines and arguably designers to have full regard for these targets. The development clearly does not respect these targets for St Peters Gardens.</p>	<p>The Council notes the comments and objection made in relation to the new Local Plan Policy LCA SA 12 Ladywell Play Tower.</p> <p>The new Local Plan Policy LCA SA 12 seeks the redevelopment of this site to secure a mixed-use development comprising main town centre, community, and residential uses. The redevelopment of the site will also secure the restoration and enhancement of the Grade II listed Ladywell Baths. The Council highlights that the latter building is currently on the Heritage at Risk Register. The redevelopment of the site provides a viable opportunity to restore the building and return it to an appropriate community use. The Council considers this approach to be sound.</p>	No further actions required in relation to the new Local Plan.

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							<p>During the visit to our houses, we have asked Mr Mark Batchelor to provide us with drawings showing how specific flats from St Peters Gardens will be seeing new development. We have been told this is possible. However, on 25th July 2022 we have received number of drawings, but not even one was from our building's perspective.</p> <p>I have emailed back asking for the drawings showing an impact on our building, from both sides of St Peters Gardens and I received a response on 5th October that there is nothing available to show the relationship with St Peters Gardens.</p> <p>I have asked a few times for the council/ developer to agree coverage of the independent surveyor. I would really like to invite someone over to do the light testing.</p> <p>My apartment is North facing one and I barely get a good sunlight now. With 3 storey building being put in front of my windows I won't be getting any.</p> <p>This is an additional point to the previously raised point that the proposed development and St Peters Gardens are below the recommended distance levels.</p> <p>I insist to get an agreement to appoint an independent surveyor of residents' choice to conduct necessary checks. I estimate costs of up to £2,500 (net).</p> <p>Another issue with the development is privacy of the residents of St Peters Gardens. We strongly believe, judging from the available drawings, that circa 50% of the residents of St Peters Gardens will lose their privacy and won't be able to have their bedrooms curtains open most of the time. We need to remember that we have number of children living in St Peters Gardens.</p> <p>We also would like to remind you, that when St Peters Gardens was being developed there was a promise that no other development will stand in front of it. This was the agreement Purelake (original developer) had with the Council. Some of us purchased the flats based on this information. I do appreciate it was a decade ago but original residents are still here and this promise should be valid.</p> <p>To end the objection, I would like to repeat that the destruction of number of mature trees is absolutely unacceptable.</p>	<p>The Council notes the comments that redevelopment will harm the amenity enjoyed by neighbouring residents. This is an important consideration – however, it is beyond the scope of plan-making. Nevertheless, it is a matter that will be explored through the Council's decision-taking responsibilities.</p>	
CON18	REP067		Jaki	Rance		LNA SA 15	I wholly reject the plan to demolish the Albany and build on its green spaces.	The Council notes the comments made in relation to the new Local Plan Policy LNA SA 15 Albany Theatre.	No further actions required in relation to the new Local Plan.

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							<p>I am concerned that the current artistic director of the Albany hopes to benefit personally from the development.</p> <p>Where will the people of Deptford be able to make a noise if every inch of land is a residential development.</p> <p>The best outcome for the creative of Lewisham is a new management at the Albany, who don't turn a deaf ear to the needs of the community.</p>	<p>The new Local Plan Policy LNA SA 15 seeks the comprehensive mixed-use redevelopment of the site. This will comprise compatible main town centre and residential uses, including retention and enhancement of the Albany Theatre. The redevelopment of the site will also secure public realm enhancements, including public open space. The Council considers this a sound approach.</p> <p>The Council notes the specific comment relating to the possible harm to surrounding residential amenity. This is a valid consideration. Nevertheless, it is highlighted that the site is already adjacent to existing residential uses. The Council acknowledges that town centre uses need to be balanced so that they complement each other. The decision-taking process provides an appropriate mechanism for introducing site and use-specific requirements that manage and maintain that balance.</p>	
CON019	REP068		Jane	Ford	2	GR 05	<p>I am writing to comment on Lewisham's local plan.</p> <p>The value of mature trees is being underestimated. The benefits to residents of all ages is substantial. With increasing heat waves, it is more difficult for younger trees to get established. Designing around existing trees would allow future generations to enjoy them.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy GR 5 Urban Greening and Trees. The Council is committed to enhancing Lewisham's status as a Green Borough. This is a clear objective that runs through the new Local Plan in respect of its spatial strategy, site allocations and planning policies. This is clearly stated across the new Local Plan Policies found across Chapter 10 Green Infrastructure.</p> <p>The Council considers that new Local Plan Policy GR 5 Urban Greening and Trees is sound and does place a high value on existing trees – including mature trees. This is clearly expressed through the text at Policy GR 5 E a) – d). The Council believes that the existing wording responds positively to the representation.</p>	No further actions required in relation to the new Local Plan.
CON019	REP069		Jane	Ford	2	GR 01	<p>The potential for net loss of green space is a concern as densification becomes the focus of development. Green spaces are needed for people's physical and mental health and they must be protected. During the pandemic, the value of these</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy GR1 Green infrastructure and Lewisham's Green Grid.</p>	No further actions required in relation to the new Local Plan.

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							spaces was very clear and it is sad to see them being eroded. Lewisham's provision of green space per person is poor and parks are especially important for those without a garden. Prioritising parks sends the right message about these essential community assets, which suffer from under-investment.	<p>The Council acknowledges that the provision of open space and green infrastructure networks is an essential component to securing sustainable growth and place-making over the plan period. This is a clear objective that runs through the new Local Plan in respect of its spatial strategy, site allocations and planning policies. This is clearly stated across the new Local Plan Policies found across Chapter 10 Green Infrastructure.</p> <p>The Council considers that new Local Plan Policy GR 1 Green infrastructure and Lewisham's Green Grid is sound and does place a high value on Lewisham's network of green and open spaces, waterways, and green features.</p> <p>Additionally, the new Local Plan Policy GR2 Open Space provides a specific focus on this matter. Policy GR2 seeks to protect and enhance existing open space provision and work with residents and communities to identify further opportunities to extend and improve the Borough's open space networks. The Council believes that these two policies respond positively to the representation.</p>	
CON019	REP070		Jane	Ford	2	QD 03	Provision for quality street level amenities is important and can be easily forgotten. The experience of pedestrians at ground level is a key part of planning and provision should be made to protect and create pleasant spaces. Some focus and thoughtful design can transform the feel of an area for pedestrians. Otherwise developers are able to create grey, desolate wind tunnels without challenge. Simply adding a retail unit at the base of a tower block is insufficient. Lewisham needs to be more aspirational about the public realm, rather than it being an after thought. There are plenty of examples where urban space has been designed well, and it is unclear what Lewisham is trying to emulate with this plan.	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 03 Public realm and connecting places.</p> <p>The new Local Plan Policy QD 03 seeks to secure an integrated public realm network that contributes towards place-shaping and serves to connect the Borough's place. It seeks to ensure that public realm is an integral design consideration – not an afterthought. The Council considers this a sound approach towards place-making.</p> <p>The Council highlights that the policy requires development “...respond positively to the movement and connective function of the public realm. They should be designed to enable and encourage</p>	No further actions required in relation to the new Local Plan.

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								movement by walking, cycling and the use of public transport, and seek to reduce vehicular dominance and speeds. Proposals must ensure that the public realm provide for coherent relationships with surrounding buildings and land-uses, and good connections within and between neighbourhoods.”	
CON020	REP071 a and b		Jonathan	Mann	2	QD 04 LSA 03	<p>I write to express concerns regarding the draft Lewisham Local Plan and specifically the Bell Green and Stanton Square areas, which are local to me.</p> <p>Section QD4 proposes a 16 storey limit around Bell Green and a 12 storey limit around Stanton Square (Figure 5.9). These heights are excessive, and the supporting evidence base is flawed, because it relies on incorrect assumptions in the evidence base. There is no confirmation that the Bakerloo Line will extend within the life of the Local Plan, and there is not yet a masterplan for this area, but the evidence base relies on both to form guidance on the height limit. The heights proposed are unsound and should be reviewed.</p> <p>With regards to building heights generally (not just the areas mentioned above, the area around Lower Sydenham and in fact all areas set out under QD4), Lewisham Council has declared a Climate Emergency (2019) and has set out ambitions to be carbon neutral by 2030. New development zones should therefore, I would argue, be set constraints that drive low carbon development; the market will tend to build out the full possible extent of a site, so it is crucial that planning steers decisions towards sustainable outcomes. A limit of say 6-10 storeys would promote raft foundations rather than piling, and limit the stiffening required in the structural frame generally, greatly reducing the quantity of embodied carbon within each building. Lowering height limits further, to 11-18m, would promote the use of timber construction, rather than concrete. Can the height limits, or the associated wording, be changed to genuinely drive sustainable urbanism?</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 04 Building Heights.</p> <p>The Council believes that the new Local Plan has been informed by a comprehensive evidence base. This includes a thorough assessment of the possible impacts of the planned-for scale and intensity of growth across the Borough. This is particularly in respect of assessment of potential impacts on the design, character and setting of existing places across the Borough. This evidence has been considered within the wider context of possible impacts upon designated heritage assets – including conservation areas and listed buildings. The Council considers new Local Plan Policy QD4 to be justified.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high levels of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan’s spatial strategy, site allocations and planning policies.</p> <p>The comments raised in relation to sustainable building design and</p>	No further actions required in relation to the new Local Plan.

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								construction techniques, and their possible impact upon climate change is noted. As set out above, the new Local Plan seeks to optimise the accessibility enjoyed by places across the Borough and at the same time make best use of the deliverable and developable sites that are genuinely available to deliver the future planned-for growth. The Council acknowledges that there are other possible approaches, which may further optimise sustainable development and limit possible adverse impacts. However, those alternatives are not demonstrably deliverable and developable. For those reasons the Council maintains that the new Local Plan is sound.	
CON021	REP072		Julia	Webb	3	LSA 01	<p><u>Response to Policy LSA1: South Area place principle.</u></p> <p>This policy is not sound in relation to policy LSA1a, which cites the Open Lewisham strategic objective (OL1), in the absence of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve.</p> <p>The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to start this as soon as possible. We are told that the neighbourhood will be ‘focused around a new local centre’, but without a masterplan, we don’t know where the focal point will be. Deciding on the eventual position of the new station and bus interchange would allow the central area to be planned around it.</p> <p>Good growth opportunities for Bell Green are blocked by waiting for the Bakerloo Line. For decades, this has delayed any decision on relocating the current station which is isolated, connecting with only one bus, from Bell Green to Bromley. The Bakerloo extension 2 is unlikely to happen within the lifespan of this Local Plan, and alternative strategies exist to enable positive development. If the current station was moved, it would immediately improve PTAL rating, even if it weren’t possible to convert the line for underground or overground services.</p>	<p>The Council does not consider this a matter of soundness. It is entirely correct that the site allocations contained within the new Local Plan set out requirements, where necessary and appropriate, that masterplans or further supplementary planning documents, be prepared following adoption or as part of the delivery and development management processes.</p> <p>For the purposes of clarity, it is highlighted that masterplans and supplementary planning documents must have parent policies, located within an up-to-date local plan. Sequentially, the relevant local plan parent policies must be adopted in advance of any subservient supplementary document or masterplan. For that reason, the Council considers the approach set out under new Local Plan to be sound.</p> <p>Following the adoption of the new Lewisham Local Plan, the Council will be better placed to consider the preparation and production of necessary supplementary planning documents. The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents. The Council can demonstrate</p>	No further actions required in relation to the new Local Plan.

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							<p>None of the active travel connectivity can be delivered in the absence of a Bell Green Masterplan, as developers cannot deliver any such connectivity on a single plot. Once the desired routes are set out in the Masterplan, developers have something to work on. (Policy LSA I)</p> <p>Sydenham Green Health Centre (SA5) is already grossly overstretched due to new housing developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. This is classed as urgent, but has not been actioned, and there is no evidence of any plans in place. Any new developments will overwhelm the Health Centre's capacity, so this vital infrastructure needs expanding whether the N4 hub project is confirmed or not. This should be included in the Bell Green Masterplan.</p> <p>Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.</p>	<p>that it has met and exceeded the legal requirements relating to public consultation and engagement.</p> <p>The Council acknowledges that residents and communities can become frustrated by the development lead-in times required for major strategic infrastructure improvements – such as the proposed Bakerloo Line extension and potential railway station relocations. Infrastructure improvements of this scale and nature are complex and require significant investment. The new Local Plan covers period of fifteen years but, in accordance with national planning policy (NPPF Paragraph 22), can look further ahead to consider the likely timescale for delivery of both growth and associated infrastructure. Within this context it would be premature to consider the early implementation of an alternative strategy which may later prejudice a wider objective. Nevertheless, the Council believes that the new Local Plan and the associated Infrastructure Delivery Plan are sufficiently flexible enough to allow for the consideration of alternative solutions should the Bakerloo Line Extension prove unforthcoming.</p>	
CON021	REP073		Julia	Webb	3	LSA 02	<p><u>Response to Policy LSA2 South Area place principle.</u></p> <p>This policy is not sound in relation to policy LSA2b, due to the lack of a Bell Green Masterplan, robust data about the existing and projected future capacity needed in social infrastructure, and other vital supporting evidence. The lack of these guidelines makes the policy ineffective in what it sets out to achieve. The LLP says that developers must follow the Bell Green masterplan, to deliver a new mixed-use neighbourhood. The proposed Bell Green Masterplan would allow development to proceed with the focal point, street alignment and areas of tall buildings agreed. The Masterplan process has not been started by Lewisham, and all parties urge them to get started without delay.</p> <p>Significant transport accessibility improvements, active travel routes, and the transformation of the retail park into a new mixed-use neighbourhood cannot happen without a masterplan (LSA2b). Waiting for the Bakerloo campaign is</p>	<p>The Council does not consider this a matter of soundness. It is entirely correct that the site allocations contained within the new Local Plan set out requirements, where necessary and appropriate, that masterplans or further supplementary planning documents, be prepared following adoption or as part of the delivery and development management processes.</p> <p>For the purposes of clarity, it is highlighted that masterplans and supplementary planning documents must have parent policies, located within an up-to-date local plan. Sequentially, the relevant local plan parent policies must be adopted in advance of any subservient supplementary document or masterplan. For that reason,</p>	No further actions required in relation to the new Local Plan.

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							<p>delaying good growth in Bell Green. Move the station, and either the mainline service or Overground would improve connectivity and accessibility. It could be used by the Bakerloo line when that arrives. Whatever the future of the line, the new station is vital. This needs to be specified in the proposed Bell Green Masterplan.</p> <p>Bell Green is proposed as a regeneration node, in a Strategic Area for Regeneration. However, its proposed status has been downgraded from a proposed new Town Centre to a Local Centre. * The sites' indicative growth potential is shown for a town centre. The scope of brownfield development at Bell Green will create far more than a small cluster of shops for convenience retail, and a community anchor. It has far more than that already. The LLP seems conflicted about Bell Green's future, and it needs to be clarified before the GLA will consider designating it as an Opportunity Area.</p> <p>*"Commented [NE791]: Latest Retail Impact Assessment and Town Centre Trends Study indicates scope for Local Centre is appropriate – this is reflected in amended policy point C.c above."</p> <p>Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.</p>	<p>the Council considers the approach set out under new Local Plan to be sound.</p> <p>Following the adoption of the new Lewisham Local Plan, the Council will be better placed to consider the preparation and production of necessary supplementary planning documents. The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents. The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement.</p> <p>The Council notes comments made in relation to Bell Green's status as a Local Centre. For clarity, its status as such is a statement of fact and not a retrograding action. The Council acknowledges that following the regeneration of the Area the extent of commercial and retail activity may increase – indeed this is a desirable outcome of sustainable growth. Should that happen, the Council will reassess its status and redesignate accordingly.</p>	
CON021	REP074		Julia	Webb	3	LSA 03	<p><u>Response to Policy LSA3 Bell Green and Lower Sydenham</u></p> <p>This policy is not sound in relation to Policy LSA3c, due to the lack of a Bell Green Masterplan, and other vital evidence. The lack of the Bell Green Masterplan makes the policy ineffective in what it sets out to achieve.</p> <p>We need a Masterplan before the GLA will even consider designating Bell Green as an Opportunity Area. (LSA3 A). Lewisham has not started on a Masterplan (LSA3 B), despite having rejected the designation of a community Neighbourhood Forum that wished to create one. The aspiring Bell Green Neighbourhood Forum, refused designation by Lewisham, started work in 2019, and has had an extraordinarily hostile response from Lewisham, who have refused to have any discussions with us. We have a membership of 80, and despite an overwhelmingly positive local consultation response, Lewisham rejected our Area boundary, and so our Forum. They have since also refused to recognise us as an amenity society, having changed their definition of such groups to being based on the boundary of a</p>	<p>The Council does not consider this a matter of soundness. It is entirely correct that the site allocations contained within the new Local Plan set out requirements, where necessary and appropriate, that masterplans or further supplementary planning documents, be prepared following adoption or as part of the delivery and development management processes.</p> <p>For the purposes of clarity, it is highlighted that masterplans and supplementary planning documents must have parent policies, located within an up-to-date local plan. Sequentially, the relevant local plan parent policies must be adopted in advance of any subservient supplementary document or masterplan. For that reason, the Council considers the approach set out</p>	No further actions required in relation to the new Local Plan.

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							<p>single conservation area. This gives us little confidence in the delivery of such consultation.</p> <p>The missing Masterplan undermines the aspirations expressed in Policy LSA3c; redevelopment of SA1, the Livesey Memorial Hall and gasworks site, is already underway in the planning process; local residents' aspirations for the Masterplan, such as a reconfiguration of the roads and pedestrian access (LSA3 Ce) are being blocked. LSA3 Cg: infrastructure. Provision of sports facilities is of huge concern, given the closure of the Bridge Leisure Centre, and the imminent threat to the sports grounds at the Livesey Memorial Hall (SA1). Sport England, in their r18 response, stress the absence of a robust database. They say that this should include a revised Playing Pitch Strategy, and the Physical Activity and Healthy Lifestyles Strategy. Neither of these documents are published, and the current documents state that the Bridge as a functioning sports hall with swimming pools. We cannot assess Bell Green's sports provision need for new developments without a robust database; this information should have been included for the consultation process. An officer's report made in April 2023 says that '3.1. We are in the process of arranging a steering group meeting to ensure the PPS is still fit for purpose/relevant. This is in relation to changes in the way sport and physical activity are viewed post pandemic.' The Local Plan has been progressed before the necessary documents have been gathered.</p> <p>Sydenham Green Health Centre (SA5) is another piece of community infrastructure already grossly overstretched by recent residential developments. It is proposed to be upgraded for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. Classed as urgent, but has not been actioned, despite being oversubscribed, and incapable of serving the impending new housing developments.</p> <p>Currently there are extreme problems with the electricity grid at Bell Green retail park, with units powered entirely by diesel generators. There are frequent power cuts at the supermarkets, shutting off the fridges and freezers. Existing landowners and developers must cooperate to address the problem in advance of development.</p> <p>Policy LSA3 Dd urges developers to respond positively to heritage assets and their setting, including the Livesey Hall War Memorial and gardens. This should read the (grade II listed) Livesey Memorial Hall, the Livesey Hall War Memorial, the Livesey Hall's Front Wall, and sportsgrounds. NOT gardens. This aspiration is being undermined by the lack of a</p>	<p>under new Local Plan Policy LSA 3 to be sound.</p> <p>Following the adoption of the new Lewisham Local Plan, the Council will be better placed to consider the preparation and production of necessary supplementary planning documents. The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents. The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement.</p> <p>In respect of neighbourhood planning, the Council continues to work positively with all bodies across the Borough seeking to establish themselves as Neighbourhood Forums. The processes of identifying a new neighbourhood area and establishing a forum are carried in accordance with The Neighbourhood Planning (General) Regulations 2012.</p> <p>The Council considers that proposed modifications to new Local Plan Policy LSA 3 D d) are not matters of soundness. Whilst the additions may provide additional detail for the reader, they are not necessary in themselves to make it sound. The new Local Plan must be considered in its entirety. As such, new Local Plan Policy HE2 provides an appropriate framework to consider proposals relation to designated heritage assets.</p>	

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							Masterplan, which is allowing developers to push for tall buildings in close proximity with the Hall, threatening its viability as our Asset of Community Value. It is also undermining the Agent of Change protection of this important community hall, whose existing use of music, live performance and events for the local community is to be undermined by intensive residential development in close proximity. This will lead to conflict between the existing use and the new residents' quality of life. Because of the importance of these issues in promoting the redevelopment of our area, the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.		
CON021	REP075		Julia	Webb	3	LSA SA 01	<p><u>Site Allocations</u></p> <p><u>SA1: Former Bell Green Gas Holders and Livesey Memorial Hall</u></p> <p>SA1's boundary is problematic; two interlocking sites with separate landowners, both currently in the planning system (Apex and Barratt London), plus a third landowner (SGN), currently withholding its land from development. This site allocation policy is not sound, as the omission of the gas pressure station prevents the creation of a coherent street pattern.</p> <p>The southeast corner is designated as an <u>Appropriate Location For Tall Buildings</u>, despite its proximity to the listed structures of the Livesey Memorial Hall, the most sensitive and heritage-rich section of Bell Green. This proposed designation derives from the site-ownership-based boundaries shown at r18. The poor-quality mapping provided for the Tall Buildings zones, shown in opaque orange, obscured this block's isolation from the rest of the Tall Building zone by the Spine Road, which is a public highway, and a major access road. The relevant section of public highway is included in the r19 site boundary, though it cannot be developed. This isolated block has been overlooked by all but the most intense scrutiny.</p> <p>SGN provided Lewisham with a plan, offering their gas pressure station area for development, yet their current public stance is that this area cannot be developed for safety reasons. This causes huge difficulties for the adjoining developments, as cooperation between developers to create a coherent streetscape is non-existent. This piecemeal approach won't build a positive community.</p> <p>The Apex (Livesey Memorial Hall) site includes a strip of land adjoining the 'British Gas Exclusion Zone' SINC extension, which was assessed as being identical habitat to the SINC and designated in the Parks and Open Spaces strategy 2020-2025</p>	<p>The Council notes the comments made in relation to the fragmented landownership and the possible constraints that this poses to comprehensive redevelopment of the site allocation.</p> <p>The new Local Plan Policy LSA SA 01 seeks to secure a comprehensive redevelopment of this site allocation. The policy wording responds to this by clearly stating that the landowners across the site must work together in partnership and in accordance with a master plan for the wider Bell Green and Lower Sydenham area and including a site masterplan, to ensure appropriate co-location, phasing, and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). It is not unusual for previously developed sites located in urban areas to be in multiple landownerships. This is never in itself a constraint to comprehensive development. The development process remains the appropriate platform for this matter to be resolved in detail. The policy, in conjunction with the new Local Plan Policy DM3, provides effective mechanism to do so.</p> <p>In respect of the possible impact of tall new buildings upon the setting of heritage assets and/ or the visual character and appearance of the wider townscape – the Council considers that this matter is also appropriately addressed through the</p>	No further actions required in relation to the new Local Plan.

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							<p>(2020) as natural greenspace (not publicly accessible). Allowing Apex to redevelop this precious natural habitat within a toxic, barren landscape seems inexplicable. The site gradients make the proposed green pathway impossible. The SINC sites were assessed in 2016 and have not been reviewed since. Even in 2016, no site visit was made, and it may have been classified by satellite photography. The report states: "Access to privately-owned sites was not always possible. This was due to a number of reasons includingDense vegetation next to waterbodies at River Ravensbourne and Pool River Linear Park; combination of field survey, aerial photography and professional judgement was used to determine what habitats are likely to be present in areas not accessible by foot. However, in most cases surveying was possible from publicly accessible vantage points (such as from bridges or adjacent roads or open space." (p.38). Given that best practice is that environmental surveys should be renewed after c. 2 years, the status of the SINC extension, or at least the natural greenspace within the Apex site should be reviewed.</p> <p><u>Agent of Change</u>. Policy QD7 Cd. of the LLP says that new noise-sensitive development is situated away from existing noise-generating uses and activities, or, where this is not possible, providing adequate separation and acoustic design measures. The Livesey is a community hall whose existing uses include live performance, music, and events, which generates a great deal of noise. This is not a problem currently, and the arrival of housing close by will create a great deal of ongoing friction. The site boundary doesn't include the necessary no-build zone to protect the existing use of the Livesey. <u>Agent of Change</u> Policy QD7 Cf. says that development must not prejudice the use of playing fields. The Bowls Green of the Livesey Memorial Hall is currently used as an exercise area for the boxing club, including the youth provision of Knives Down, Gloves Up sessions. It has also been used by Brent Knoll school, a nearby special school with very little outside space, none of which is green. Both these schemes, along with other activities for children and young people, will be threatened by child protection concerns with overlooking from housing blocks.</p> <p><u>Conclusion:</u> In order to make this site allocation sound, its Tall Buildings suitability zone needs reviewing, and robust justification given for its designation. there needs to be clarity over the SGN pressure station's future. It must be included in the design for the site layout, so a coherent street layout can be made. There needs to be a fresh assessment of the British Gas Site Buffer</p>	<p>development management process. The requirement for site specific masterplan provides an ideal opportunity for development partners and residents to consider how tall new buildings can be incorporated into this site, and the wider townscape. The policies set out in the new Local Plan under Chapter 5 High Quality Design provide a justified and effective mechanism for considering and determining this matter.</p> <p>In addition, the new Local Plan Policy LSA SA 01 sets out how the redevelopment of this site will secure and deliver site intensification, along with the introduction of a range of uses, will bring the land back into active use and support local area regeneration. This will include public open space, good quality design, infrastructure networks and the requirement to remediate land, as necessary, contaminated by historic uses. The Council considers the site-specific requirements set out in policy to be justified and effective in bringing forward the redevelopment of the site.</p>	

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							<p>Zone greenspace, and of the greenspace within SA1, omitted from the SINC. The Agent of change aspects of redevelopment must be assessed thoroughly and included in the proposed Bell Green Masterplan.</p> <p>The Bell Green Neighbourhood Group wishes to participate in examination hearing sessions, as site allocation issues have not been addressed by Lewisham, and they continue to refuse to engage with our community group.</p>		
CON021	REP076		Julia	Webb	3	LSA SA 03	<p><u>SA3: Sainsbury's Bell Green</u></p> <p>The proposed Bell Green Masterplan is needed to address the pedestrian safety issues of traffic bypassing the gyratory system, rat running through Sainsbury's carpark. Improvements in connectivity need to be made immediately to pedestrian access routes, which are currently being poorly served.</p>	<p>The Council does not consider this a matter of soundness. It is entirely correct that the site allocations contained within the new Local Plan set out requirements, where necessary and appropriate, that masterplans or further supplementary planning documents, be prepared following adoption or as part of the delivery and development management processes.</p> <p>It is appropriate that future masterplanning exercises consider the detailed design and provision of transport network improvements necessary to support new development. Although it remains inappropriate for new development to make good any existing deficiencies in infrastructure provision, the masterplanning process can nevertheless identify investment opportunities that the Council and its partners can seek to pursue outside of the delivery/ development management process.</p>	No further actions required in relation to the new Local Plan.
CON021	REP077		Julia	Webb	3	LSA SA 04	<p><u>SA4: Stanton Square Locally Significant Industrial Site</u></p> <p>SA4: This site allocation policy is not sound, as its boundary has not been justified robustly. It includes the local heritage asset of the Old Bathhouse, next to the Bell public house. This is a heritage asset which deserves local listing. Built as public slipper baths by Lewisham Council in the end of the 19th century, it survives with much of its interior intact. It is unthinkable that this should be redeveloped, and no justification is given for its inclusion. There is also no acknowledgement in this allocation of the extent of contamination of the Coventry Scaffolding site, and the wider area from the original gasworks, dating from c. 1850. The</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LSA SA 04.</p> <p>Locally listed buildings and structures are non-designated heritage assets. The new Local Plan addresses these under Policy HE3 Non-designated heritage assets. An overview of the Borough's non-designated heritage assets is included in the new Local Plan under Schedule 3 Table 21.3. <u>A full list of locally listed buildings and structures is included on the Council's website.</u> The schedule of locally listed buildings is periodically updated. The new Local Plan</p>	No further actions required in relation to the new Local Plan.

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							safety practices at this date were considerably worse than later, and it continued in gasworks use for many decades.	<p>Policy HE3 takes account of this and acknowledges that this process, of local listing, may arise during and be considered through the development management process. The local listing process allows for public engagement. For this reason, the Council maintains that the policy is effective.</p> <p>The Council acknowledges that the policy wording does not make explicit reference to possible on-site contamination attributable to historic uses. It is noted that the uses were operational during the 19th Century. Nevertheless, the new Local Plan includes a range of generic development management policies which the Council can deploy to manage such eventualities. Most notably the new Local Plan Policy SD 1 Ground Conditions provides an appropriate and effective mechanism for addressing this matter should it arise.</p>	
CON021	REP078		Julia	Webb	3	LSA SA 05	<p><u>SA5: Sydenham Green Group Practice</u></p> <p>Sydenham Green Health Centre (SA5) is already grossly overstretched due to new developments. It is proposed for designation as Neighbourhood Care Centre for Neighbourhood 4, the Southwest section of Lewisham. Classed as urgent, but not actioned, despite being oversubscribed, and the impending housing developments. [Infrastructure Delivery plan].</p>	<p>The Council notes the observation made within the comments about the apparent capacity of the Sydenham Green Health Centre.</p> <p>The Council is committed to securing appropriate investment in the Borough's infrastructure networks to support planned-for growth. Necessary investment is identified through the new Local Plan and the Infrastructure Delivery Plan. Funding for improvements is secured through several possible sources – through CIL, which primarily serves as top-up funding that can also be used to leaver-in other sources; and other external funds/ grants.</p> <p>The Council acknowledges that communities may aspire to securing the necessary investment early – possibly ahead of new development taking place. This is not possible through the mechanisms currently in place – equally, new development can only contribute</p>	No further actions required in relation to the new Local Plan.

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								towards the infrastructure required in support of growth; it cannot be used to make good existing shortfalls in provision. For these reasons the Council concludes that the new Local Plan is effective, positively prepared and is in accordance with national policy.	
CON021	REP079		Julia	Webb	3	LSA SA 08	<u>SA8: Land at Pool Court</u> Policy SA8 is unsound, as it is ineffective in what it sets out to achieve. The site is unsuitable, being unfit for human habitation due to high risk of regular flooding at the confluence of two rivers. The quality of life is further degraded by being closely bordered by two railway lines. This site allocation fails to address Lewisham’s duty to provide a travellers site; what is needed is rather a stopping site. Travellers have crossed the area for at least four hundred years, still do so several times a year, and need somewhere to stop enroute. A tiny residential site doesn’t address this need.	The Council notes the comments made in relation to the new Local Plan Policy LSA SA 08 Land at Pool Court. The Council considers that the site allocation is sound, deliverable, and developable. The site allocation has been assessed through the housing land availability and the sustainability appraisal reporting processes. For those reasons it is considered effective and justified.	No further actions required in relation to the new Local Plan.
CON021	REP080		Julia	Webb	2	EC 08	<u>EC18 Culture, creative industries and the night-time economy</u> The Bell Green Neighbourhood Group supports the application being made for a Bell Green Cultural Quarter. The Livesey Memorial Hall has a proud history of live performance, music, and community events, along with art exhibitions and cultural activities. Sydenham Library hosts art studios, exhibitions, and workshops. It is the base for Spontaneous Productions shows being shown in Home Park, next door. Whirled Art Studios has set up a complex of studios on Stanton Island, which were rented out immediately. My Aerial Home is a distinguished studio and school for aerial circus disciplines, based on the Trade City retail park, and Glenlyn Academy is a dance and performance school based on the Home Park Estate. Given the EC18 policy for growing the creative industries as a source of employment in Lewisham, further studios would be a positive use of the heavily contaminated land of the Coventry Scaffolding yard. Site of the earliest phase of the Bell Green gasworks, the contamination is likely to be very bad, and would be prohibitively expensive to remediate it to the level acceptable for residential use. The Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions on this matter, as it is vital to the development of employment opportunities in Bell Green.	The Council notes and welcomes the broad support offered by the representation in relation to the new Local Plan Policy EC 18 Culture, creative industries, and the night-time economy. The Council notes the comments made in relation to the new Local Plan Policy LSA SA 01, which seeks the redevelopment of the former Bell Green Gas Holders and Livesey Memorial Hall. The Council considers the policy approach to the redevelopment of this site to be sound. The new Local Plan Policy LSA SA 01 makes provision for the site to be redeveloped for a mix of uses, which could allow for the types of use identified within the representation.	No further actions required in relation to the new Local Plan.
CON021	REP081		Julia	Webb	4	Schedule 1	Schedule 1. Table 21.1 Livesey Memorial Hall should be added to the list of Local Landmarks.	Local landmarks are a “local” designation. They include both buildings and structures that are non-statutory or designated heritage assets. Their identification is not	Determine whether the identified site has been identified as a local landmark.

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								<p>dependent upon the plan-making process. They can come forward through the conservation area appraisal process or potentially through area masterplanning. The omission of a potential future candidate for local landmark status does not raise an issue of soundness for the new Local Plan.</p> <p>For clarity, it is noted that the Livesey Memorial Hall is a designated heritage asset. As such it's visual character, appearance and wider setting is a consideration for decision-takings and is supported through national policy and new Local Plan Policy HE2.</p>	<p>Subject to this being the case consider its addition to Table 21.1 as a minor modification (omission).</p> <p>Otherwise – no further action required.</p>
CON021	REP082		Julia	Webb	4	Schedule 2	<p>Schedule 2.</p> <p>Table 21.2 Missing from Conservation Area list - The Thorpes Conservation Area.</p> <p>Table 21.2 London Squares – Taymount Rise is missing from the list. Fambridge close is NOT the substitute for the designated Stanton Square. Stanton Square was redeveloped without substitution, and restitution attempts are in process.</p>	<p>The Council acknowledges that the new Local Plan Table 21.2 has omitted the Sydenham Thorpes Conservation Area. The omission shall be address through a minor modification.</p> <p>Local Plans are snapshots in time and are prepared using data that is available during their production. Heritage assets are designated outside of the Local Plan-making process, and it is possible that more current data could become available during the Plan period. This is normal. Nevertheless, the Council will consider this comment and determination whether a designated heritage assessment has been omitted.</p>	<p>Introduce an amendment to Table 21.1 to include Sydenham Thorpes Conservation Area as a minor modification.</p> <p>Determine whether the identified sites are designated heritage assets.</p> <p>Subject to these being a designated heritage asset consider their addition to Table 21.2 as a minor modification (omission).</p>
CON021	REP083		Julia	Webb	4	Schedule 5	<p>Schedule 5</p> <p>Table 21.5 No mention of any retail existing at Bell Green, or on Perry Hill/Catford Hill.</p>	<p>Schedule 5 Table 21.5 is not intended to be a definitive list of all retail provision available across the Borough. It does identify the district and major shopping areas, and the extent of their primary retail areas.</p> <p>The new Local Plan sets out the Borough's town centre and retail hierarchy under Policy EC 12. Figure 8.2 identifies the location of the Borough's town centres and retail offer on a map. In addition, Table 8.4 provides a list of the network's constituent parts and an explanation of their respective roles and functions.</p>	<p>No further actions required in relation to the new Local Plan.</p>

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CON021	REP084		Julia	Webb	4	Schedule 6	Schedule 6 Table 21.6 Cultural Quarters. Please add Bell Green.	<p>The new Local Plan identifies Cultural Quarters through Policy EC18, with the specific objectives of encouraging complementary cultural, community and commercial activities. The new Local Plan Policy EC18 does not currently identify Bell Green as a cultural quarter within this decision-taking context.</p> <p>The new Local Plan Policy EC18 has been informed by supporting evidence and is considered justified. The representation has not provided the examination with any evidence that Bell Green also be considered within the context of new Local Plan Policy EC18.</p>	No further actions required in relation to the new Local Plan.
CON021	REP085		Julia	Webb	4	Schedule 11	Schedule 11 Table 21.11 Growth corridor - Perry Hill- Catford Hill not listed but shown on Policies Map.	<p>The Council notes this comment and possible omission to Table 21.11.</p> <p>The purpose of Table 21.11 is to identify the Regeneration Nodes, Growth Nodes and Growth Corridors across the Borough. It is not intended for this Table to provide a complete list of all places located within the Nodes and Corridors. It is unclear to which map the representation is referring. The new Local Plan identifies the Regeneration Nodes, Growth Nodes and Growth Corridors across the Borough at Figure 3.2 and Figure 3.3, the latter in relation to the Spatial Strategy. The Council concludes that the new Local Plan existing mapping clearly identifies the extent of the Nodes and Corridors and no further amendments are necessary.</p>	No further actions required in relation to the new Local Plan.
CON021	REP086		Julia	Webb	0	General	<p><u>Conclusions on the LLP consultations for the attention of the Planning Inspector:</u></p> <p>Consultation on the Lewisham Local Plan has been deeply flawed. Regulation 18 was conducted during the pandemic, with limited communication available. Anyone with difficulty accessing online material was excluded from involvement in the consultation. Regulation 19 consultation has taken place simultaneously with one on the Statement of Community Involvement, and constitutional changes to Lewisham Council's planning arrangements have already been approved by the full council, in advance of the SCI consultation's conclusions. Taking all of this into account, further formal</p>	<p>The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents.</p> <p>The suggestion that the formal consultations, at the Regulation 18 and Regulation 19 stages, were in some way impeded by restrictions related to the COVID 19 restrictions and recent elections is not supported by any evidence.</p>	<p>Ensure that the Council's Statement on the discharge of the Duty to Co-operate is published and submitted to the examination.</p> <p>Ensure that Statements of Common Ground with neighbouring local planning authority partners are published and submitted.</p>

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							<p>consultation is needed to achieve a common understanding of all the plans and changes proposed. Therefore, the Bell Green Neighbourhood Group concludes that this consultation is not sound, as the draft Lewisham Local Plan is neither robustly justified nor evidence led. The lack of supporting evidence (including the Bell Green Masterplan, the Playing Pitch Strategy and the Physical Activity and Healthy Lifestyles Strategy) means that it cannot be effective in what it sets out to achieve.</p> <p>In light of these facts, it is clear that the Lewisham Local Plan needs substantial modifications, and the Bell Green Neighbourhood Group would like to send a representative to participate in examination hearing sessions.</p>	The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement. Evidence is provided through the Regulation 19 Statement of Representations Procedure and the subsequent Regulation 19 Consultation Statement.	
CON022	REP087		Kate	Richardson	3	LCA SA 22	<p>I am addressing my comments on the proposed development around the A21 corridor and the Ravensbourne Retail Park taken from the document</p> <p>It is good to see there is an emphasis in the Development requirements that it needs to be designed to improve the ecological quality, carbon storage, flood storage and public amenity value of the River Ravensbourne, and seek to re-naturalise the river where feasible, taking into account the River Corridor Improvement Plan SPD. There are still concerns over flood management (see later comment)</p> <p>The A21 corridor is a key route that effects residents in the CGRA of which I am a member Concern has been expressed about the height of buildings proposed along the corridor especially when it comes to the proposed development in the retail park. At present it is low rise and the retail offered there is popular and well used. This is reflected in the growing amount of usage in the retail park Something that was not seen pre pandemic</p> <p>The Proposal for the retail park is to have 367 residential units. This is very intensive and is not clear whether important social infrastructure will be part of the plan, or indeed whether the general service infrastructure will cope. The area already has a chronic shortage of doctor's surgeries and young persons' facilities (youth clubs etc) If you are building for the future, it is important that these are built in . Could the plan not firm up on this? This was previously pointed out by residents in the prior consultation. As mentioned in the document it is close to the conservation area which is Edwardian in nature and low rise. It is important that any new building development does not detract from the Conservation area at present density appears to be the overriding</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 22 Ravensbourne Retail Park.</p> <p>The Council welcomes the broad support offered in relation to the new Local Plan Policy LCA SA 22 requirements to secure improvements in ecological quality, carbon storage, flood attenuation, and increasing the amenity value of the Ravensbourne River.</p> <p>The Council notes the expressed concern in relation the spatial strategy for the A21 Corridor.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high levels of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. The A21 Corridor is such a location – providing residents, communities, and businesses with sustainable travel choices to a wide range of infrastructure networks, facilities services, jobs, and amenities. Technical evidence has informed the plan-making</p>	No further actions required in relation to the new Local Plan.

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							<p>consideration, which is a little worrying especially without firm infrastructures in place.</p> <p>In Development requirements the plan states <i>Taller buildings that help with way finding along the A21 corridor may be acceptable, with development stepping up from Bromley Road. Taller elements should be positioned towards the centre of the site to manage and mitigate impacts on amenity, including overshadowing, on the surrounding residential areas.</i></p> <p>The plan does not commit to an upper limit and there is unease as to what height these taller elements would be. Anything over 9 storeys would be unacceptable.</p> <p>The plan proposes in the Development guidelines <i>. Development should be designed so that primary vehicular access is from the A21 and Aitken Road. Opportunities should be explored to align the street network with Barmeston Road to create a contiguous layout, where this would help to improve circulation and not adversely impact on local amenity</i></p> <p>It would have been helpful to see how this is going to be achieved. At present it is quite a busy junction with the traffic police using it</p> <p>Whilst the document states that <i>Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network.</i></p> <p>However, given the amount of press coverage on sewerage discharge would it not be better for the future to ensure this is managed in a way that is future proofed and for the plan to state this? The area is prone to flooding, drains already fill up quickly and large puddles of water already occur after heavy rain</p>	<p>process. This is reflected by the new Local Plan's spatial strategy, site allocations and planning policies. The Council maintains that this is a sound approach to meeting the Borough's future needs.</p> <p>The Council believes that the new Local Plan has been informed by a comprehensive evidence base. This includes a thorough assessment of the possible impacts of the planned-for scale and intensity of growth across the Borough. This is particularly in respect of assessment of potential impacts on the design, character and setting of existing places across the Borough. This evidence has been considered within the wider context of possible impacts upon designated heritage assets – including conservation areas and listed buildings. The Council considers new Local Plan Policy QD4 to be justified.</p> <p>The Council notes the comment made in relation to the development guideline that encourages the exploration of opportunities to improve the street layout between the A21 and Barmeston Road. In the absence of a strategic scheme, it is appropriate that the new Local Plan seeks to explore possible solutions through the site allocation. The Council maintains that this is a sound approach.</p> <p>The comments made in relation to the delivery of necessary water utility infrastructure are also noted. The Council considers the proposed approach to this matter sound.</p>	
CON022	REP088		Kate	Richardson	0	General	<p>Finally on a note on the submission document itself which I gave up on the first hurdle! Hence the email submission .You do need to have a planning degree to get through that! It is dense incomprehensible and not user friendly. If you want to engage with residents this is not the way to do it</p>	<p>The Council notes the comments made in relation to the new Local Plan document.</p> <p>The Council acknowledges that some aspects of the plan and the plan-making process may appear technical and complex to some. Nevertheless, the Council has</p>	No further actions required in relation to the new Local Plan.

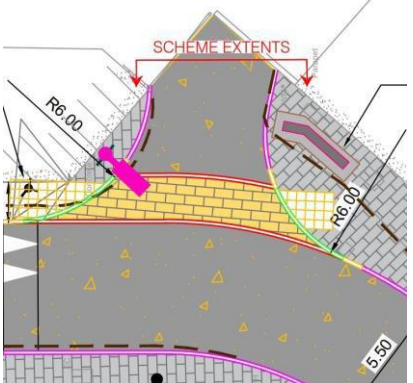
Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
								<p>sought to proactively engage with residents and communities throughout the various stages of plan-making preparation to make the process more accessible.</p> <p>The new Local Plan document is thorough and comprehensive in its coverage of the spatial strategy, site allocations, and general planning policies. The content is clearly set out, indexed and the electronic version has enhanced accessibility. The Council considers that the wording of the strategy, planning policy text and the supporting text is clear and easy to understand.</p> <p>The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement. Evidence is provided through the Regulation 19 Statement of Representations Procedure and the subsequent Regulation 19 Consultation Statement.</p>	
CON023	REP089		Kevin	Connell	0	General	<p>Can you explain what Regulation 19 is in simple terms (prior explanations made zero sense in layman's terms) and what disadvantages will arise to use residents if the council gets this through like those LTN schemes restricting our freedom? Appreciate an honest explanation of what is trying to get passed here and what it means.</p>	<p>The Council notes the comments made in relation to the processes, including public consultation, relating to the preparation and production of the new Local Plan.</p> <p>The Council considers that the purpose of the new Local Plan is clearly set out – to provide a spatial strategy, site allocations and planning policies that will direct growth and guide decision-taking over the plan period. Regulation 19 is a regulated stage of public consultation on the final pre-submission version of draft Local Plan. Representations made to the Regulation 19 consultation are submitted to the Secretary of State and are used to guide the course of the subsequent examination in public.</p> <p>The Council acknowledges that certain aspects of the plan-making process can be complex. The Council has sought to proactively engage with residents and communities throughout the various</p>	No further actions required in relation to the new Local Plan.

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								<p>stages of plan-making preparation to make the process more accessible.</p> <p>The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement. Evidence is provided through the Regulation 19 Statement of Representations Procedure and the subsequent Regulation 19 Consultation Statement.</p>	
CON024	REP090		Louise	Underwood	3	LSA	<p>Policies LSA 1, 2 and 3 of the Lewisham Local Plan repeatedly states that developers should follow the Bell Green Masterplan. This has not been produced, and they have prevented local people from creating a forum to start producing a plan ourselves. The missing masterplan, and the lack of robust justification, makes the policies ineffective in what they set out to achieve.</p> <p>I gather that Bell Green Neighbourhood Forum plan to make a submission. I agree with all their</p>	<p>The Council does not consider this a matter of soundness. It is entirely correct that the site allocations contained within the new Local Plan set out requirements, where necessary and appropriate, that masterplans or further supplementary planning documents, be prepared following adoption or as part of the delivery and development management processes.</p> <p>For the purposes of clarity, it is highlighted that masterplans and supplementary planning documents must have parent policies, located within an up-to-date local plan. Sequentially, the relevant local plan parent policies must be adopted in advance of any subservient supplementary document or masterplan. For that reason, the Council considers the approach set out under new Local Plan Policy LSA 3 to be sound.</p> <p>Following the adoption of the new Lewisham Local Plan, the Council will be better placed to consider the preparation and production of necessary supplementary planning documents. The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents. The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement.</p>	No further actions required in relation to the new Local Plan.

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								In respect of neighbourhood planning, the Council continues to work positively with all bodies across the Borough seeking to establish themselves as Neighbourhood Forums. The processes of identifying a new neighbourhood area and establishing a forum are carried in accordance with The Neighbourhood Planning (General) Regulations 2012. The absence of a current masterplan does not prevent residents from convening a neighbourhood forum.	
CON024	REP091		Louise	Underwood	2	QD 04	<p>Policy QD4 Building Heights is not sound in relation to the designation of the Building Heights identified for Bell Green and Lower Sydenham in QD4 Part C, and the designation of these areas as a 'Tall Building Suitability Zone', as identified in Figure 5.2 noted in QD4 Part D. This is due to a lack of sound justification and evidence for these designations.</p> <p>There is not sufficient justification for the Bell Green and Lower Sydenham area to be included as a 'Tall Building Suitability Zone' and all references, including reference in Figure 15.2, should be removed from the prospective Local Plan and the Local Plan Proposed Policies Map. Given this, no heights/maximum heights should be given for this area in the Local Plan and appropriate heights should be determined, as part of the development of a Planning Framework for the area, brought forward by the Council and consulted with the local communities.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 04 Building Heights.</p> <p>The new Local Plan Policy QD 04 sets out a justified and effective approach that informs the Council's decision-taking in relation to new development proposals for tall buildings. The approach set out under the new Local Plan has been prepared in partnership with the Greater London Authority and is in accordance with the adopted London Plan.</p> <p>The Council highlights that the new Local Plan Policy QD 04 Building Heights was informed and prepared by several technical pieces of evidence. These include the Tall Building Review (2023); the Tall Buildings Study (2021); and the Lewisham Characterisations Study (2019). The technical evidence has informed the content of the new Local Plan Policy QD4 – inclusive of the maximum heights set out under Policy QD 4 C. Consequently, the Council considers the policy to be justified.</p> <p>In respect of the implied framework/ master plan for the Bell Green and Lower Sydenham area, the Council does not consider this a matter of soundness. The new Local Plan Site is clear in stating that future supplementary planning documents and/ or masterplans for the area will complement site allocations. For the purposes of clarity such future documents</p>	No further actions required in relation to the new Local Plan.

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								will be subservient to their parent policies contained within the new Local Plan and provide relevant additional detail as to how the allocation will be delivered. The Council will work closely with development industry partners to ensure that such exercises fully engage with local communities.	
CON025	REP092		Margaret	Varley	3	LSA 03	I would like to express my concern and objections to the proposed developments for Bell Green. There are several proposals that seem unsatisfactory:- The proposed height of 15 storey blocks of flats is too high and will mar the skyline The buildings appear to be too close to the Livesey Hall Play areas are in shadow Most importantly there seems little attempt to provide the infrastructure needed for such a development - the Bell Green health centre is already overstretched and traffic is often congested in this area I think that the Bell Green Neighbourhood Group should be party to discussions re these plans in order to express local concerns.	<p>The Council notes the comments and concern expressed in relation to the new Local Plan Policy LSA 03 Bell Green and Lower Sydenham.</p> <p>For clarity, the new Local Plan Policy LSA 03 provides an area policy approach for Bell Green and Lower Sydenham. It sets out the broad vision, aspirations, and opportunities for the area. The subsequent site allocations – LSA SA 01 – SA 14 provide a more detailed framework, setting out site specific opportunities, requirements, and guidelines. The Council considers that these policies in concert with the new Local Plan’s general development management planning policies provide an appropriate and sound framework for decision-taking.</p> <p>The Council remains committed to working closely with development industry partners to ensure that development proposals fully engage with local communities. Where it is appropriate the new Local Plan clearly signals the requirement that development proposals, for particularly sites, areas, and places, be supported by master plans. Such exercises provide a good medium to secure community engagement.</p>	No further actions required in relation to the new Local Plan.
CON026	REP093		Matthew	Holehouse	3	LWA	<p>I wish to make comments on the Lewisham local plan. I live at 24 Grassmount, Forest Hill, SE23 3UW.</p> <p>I have read the proposed site allocations for the redevelopment of the following sites in the West Area: 4, 5, 6, 7, 9, 10, 11, 12.</p> <p>I strongly endorse all these proposals listed above. We strongly need additional housing supply, including for private sale and</p>	<p>The Council welcomes the support offered in relation to the new Local Plan Policies LWA SA 04, 05, 06, 07, 09, 10, 11 and 12.</p> <p>The Council considers the timescales identified in the site allocations to be realistic – in terms of deliverability and developability. The Council’s projected trajectory takes account of the typical time</p>	No further action required in relation to the new Local Plan.

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							including for small families (ie 1-2 bedroom). This is the only way to alleviate pressure across the entire housing ecosystem. It is not acceptable for these sites to remain empty or heavily underutilised as eg locked yards, particularly given their close proximity to the overground network. I would strongly welcome their development in the near future. My only additional comment is that the council should be more ambitious in bringing these sites on-stream on a shorter timescale than the 10+ years envisaged.	required to gain planning consent and the anticipated complexities involved in delivering town centre sites or those in multiple ownership. It is highlighted that some sites have been phased for delivery beyond the first ten years. This is where they have not yet made significant progress towards securing planning consent. The Council considers this a sound approach.	
CON027	REP094		Monika	Nadolny	3	LCA SA 12	<p>I am writing to strongly object to the development of Ladywell Play Tower.</p> <p>Myself and few neighbours from St Peters Gardens have written to the Council a number of times and we still believe that our objections are valid and that the development should not take place.</p> <p>We have had local councillors at our flats so they could see how badly privacy and lighting of our flats will be affected.</p> <p>I have 14-year-old daughter, her bedroom windows would directly face someone else's windows. Something I strongly object to. Also, my bedroom would face the same problem. I would need to keep my blinds shut in order to carry out daily routine.</p> <p>My neighbour asked for an independent survey as we all believe the findings in yours are incorrect. We are still waiting for an agreement to appoint anyone.</p> <p>I also believe, it was already raised that development would cause more pollution, especially with well aging trees removed, as well as disturb local animals.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 12 Ladywell Play Tower.</p> <p>The new Local Plan Policy LCA SA 12 seeks the redevelopment of this site to secure a mixed-use development comprising main town centre, community, and residential uses. The redevelopment of the site will also secure the restoration and enhancement of the Grade II listed Ladywell Baths. The Council highlights that the latter building is currently on the Heritage at Risk Register. The redevelopment of the site provides a viable opportunity to restore the building and return it to an appropriate community use. The Council considers this approach to be sound.</p> <p>The Council notes the comment that redevelopment will harm the amenity enjoyed by neighbouring residents. This is an important consideration – however, it is beyond the scope of plan-making. Nevertheless, it is a matter that will be explored through the Council's decision-taking responsibilities.</p>	No further action required in relation to the new Local Plan.
CON028	REP095		Nicholas	Blythe	2	EC 05	<p>Section EC5 (d) states:</p> <p>1. The reconfiguration of the Surrey Canal Road SIL is facilitated through the Local Plan. Land at the Bermondsey Dive-Under is designated SIL to provide substitute industrial capacity for the release of SIL at Apollo Business Centre, Trundleys Road and Evelyn Court. These sites released from SIL are re-designated as LSIS where the co-location of employment and other compatible uses will be supported in</p>	<p>The Council notes and welcomes the support offered to the new Local Plan Policy EC 05 Strategic Industrial Locations (SIL).</p> <p>The Council considers that the approach to Strategic Industrial Location provision and the wider provision of industrial employment floorspace through</p>	No further action required in relation to the new Local Plan.

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							<p>line with Policy EC6 (Locally Significant Industrial Sites) and relevant site allocation policies.</p> <p>The proposed reconfiguration of these sites as LSIS (locally significant industrial sites), which allows inclusion of 'other compatible uses' (e.g. residential), responds both to satisfying housing need whilst retaining local employment opportunities, and by offering a more flexible approach to development makes it more likely that the land will be beneficially developed and by allowing an element of cross subsidy increases the likelihood of satisfying both the desired employment opportunities and housing need.</p> <p>For the above reasons we support the above policy as sound.</p>	complementary Policies EC 06 and EC 07 provide a sound mechanism for meeting the Borough's industrial employment needs.	
CON029	REP096		Paul	Malone	3	LNA SA 17	 <p>My objection to this proposal is related specifically to the area adjacent to my studio (denoted by the text 'R6.00' on the left of the diagram) and in general to the reconfiguration of Creekside as it affects the operation of the studio block / gallery in which I have my art practice.</p> <p>1) The extension of the pavement and positioning of a granite seating. Because of the configuration of the Yard within the gates, vehicles have to reverse parallel to the existing kerb (black dotted lines). Often deliveries and pick-up from the studios are by large lorries (including articulated). The proposed configuration will severely restrict these movements.</p> <p>The seating is not needed and will add to these problems. See the blue arrows for the access track, existing white dotted track lines and the green arrow showing a 40cms kerb inside the gate. The seating would restrict APT artists in the extension (welding shed) access along this pavement to the Yard for i.e. loading.</p> <p>2) Signage pollution.</p>	<p>The Council note the comments made in relation to the new Local Plan Policy LNA SA 17 Lower Creekside Locally Significant Industrial Site.</p> <p>The Council notes the specific comments made in relation to possible investments and improvements to transport infrastructure at Creekside. The Council considers that these are principally matters of detail that are addressed through the decision-taking process. The new Local Plan does require proposals at this site allocation to take a master planning approach. This provides residents, communities, and others with an interest in the implementation of the new Local Plan with an opportunity to engage in matters of detail.</p> <p>The Council also notes the comments made in relation to car parking and by implication car use and ownership.</p> <p>The Council acknowledges the expressed concerns relating to parking provision for privately owned motor vehicles. The new Local Plan is actively seeking to encourage sustainable growth of our Borough's places. That growth is being supported with investment into strategic and local sustainable travel networks, which will provide residents and communities with viable transport alternatives. The Council</p>	No further action required in relation to the new Local Plan.

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							<p>The waymarking sign is not needed (most people have maps on phones) and is visually intrusive. The kerb has been extended just to accommodate the sign but then the presence of the sign undoes this benefit especially for wheelchair users and buggies.</p> <p>3) Road table As you can see on the map, my studio is right next to the gate and in a direct trajectory with the eastbound section of Creekside. After the existing road hump was installed (besides No2 Creekside) there have been 3 collisions between vehicles and my studio. The last time was with a heavy lorry which caused structural damage to the steel frame of the building. Thankfully no pedestrians were involved. What appears to be happening is that vehicles with suspension problems impact with the road hump, the wheel collapses into the wheel arch and, when it comes to turn the bend in the road it is not able to do so. This would be made worse by moving the ramp of the hump nearer to my studio and so giving drivers less time to respond. The current on-street parking arrangements restrict speed already without any cost to the ratepayer (see below).</p> <p>4) Parking Currently there is free on-street parking for about 20 vehicles in our vicinity. This is beneficial both for delivery / pickup and for visitors to the gallery and education events. The proposed scheme is for a severe restriction down to one loading bay and 3 disabled bays. This is not what was proposed in the original Plan which stated that there would be no change to the current parking quotas in Creekside. I would expect to see this implemented.</p> <p>4 Sub-points i) Many of our artists and visitors are usually carrying heavy or bulky materials - i.e. photographic equipment, artworks, construction.</p> <p>ii) As we are seeing at the moment with the strikes, public transport can often be unreliable. This will only get worse as the economy deteriorates.</p> <p>iii) The Mayor speculated that traffic pollution kills 4000 Londoners a year. This has now been disproved.</p> <p>iv) Arhennius' climate change theory was de-bunked in 1909 by the chemist Robert Wood. It was only resurrected in 1971 by the Club of Rome for globalist political purposes. It has no place as a determining factor in local planning issues.</p>	<p>considers that during the lifespan of the new Local Plan, residents will be make the choice of either using sustainable travel modes or continuing with car ownership. Evidence demonstrates that societal changes in travel mode do have a profound on place. For these reasons contrary to the stated comments, the Council considers it entirely reasonable that during the plan period demand for private car parking provision will reduce. Advances in vehicle ownership models and technology (particularly AI) could further influence this trend.</p> <p>For these reasons, the Council maintains that the new Local Plan is sound.</p>	

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							5) The Function of Creekside Creekside has often been called 'London's most creative street'. This has been due to the affordable and flexible nature of its properties and also its independently minded culture. Its origins are in productive industrial activity dating back to the 1500's ship building and continuing until the 1980's. Creative individuals in this area have regenerated the function of the street often at their own expense and hard work. This is what has given the street its own unique character. Andrew Carmichael – one of APTs founders - once said in the 1990's that Creekside "Could be a creative powerhouse... or it could be a dormitory". The 'look' being proposed here is best described as 'corporate vernacular', perhaps one of the more unfortunate aspects of our time.		
CON030	REP097		Richard	Senior	0	General	<p>A lot of work has obviously gone into this, but it is hard for me to comment:</p> <ul style="list-style-type: none"> There is a vast number of documents, and even if I narrow it down to the ones which concern me more than others it would take a huge amount of time to analyse properly - time I do not have. At the time of writing, there are comments on only 5 of the 19 "proposals", and these comments add up to a grand total of 11. That is no surprise. John Montagu wrote: "If any man will draw up his case, and put his name at the foot of the first page, I will give him an immediate reply. Where he compels me to turn over the sheet, he must wait my leisure." There are some weird questions such as whether things are 'legally compliant'. Compliant with what? In any event, I am not any sort of lawyer, so how could I know the answer to this? The language used is stilted and likely to alienate some people. A random example: "The successful delivery of the spatial strategy will require that new developments optimise the capacity of sites". Is this trying to say that new building should make best use of space? This sort of pompous prose is not good. Or how about "Development proposals must demonstrate an understanding of the site context". One of my teachers taught that, if the opposite of a statement makes no sense, the statement itself is fatuous and of no value. The opposite here is; "Development proposals must NOT demonstrate an understanding of the site context". Go figure, as our US cousins say. 	<p>The Council appreciates and understands that the plan-making process, and the quasi-legal language that is used can alienate some people. In response, the Council is committed to continuing positive engagement with residents and communities as an integral part of its plan-making and decision-taking responsibilities. The Council acknowledges that process must seek to make these responsibilities more accessible and transparent.</p> <p>Within the context of the current Regulation 19 consultation, the Council is relatively restricted in terms of scope. For clarity, the consultation is not primarily for the Council's benefit but rather for the forthcoming examination, during which an independent Inspector appointed to represent the Secretary of State will examine the legal compliance and soundness of the new Plan. Out of necessity the consultation is required, by Regulation, to request that respondents identify specific matters of legality and soundness. This helps to determine what specific actions need to be undertaken to ensure that the new Plan meets its legal responsibilities and the tests of soundness (set out in national planning policy).</p> <p>Local plans are a material consideration in decision-taking – planning applications are</p>	No further actions required in relation to the new Local Plan.

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							It is obvious that a lot of people have done considerable work on this, but if you really want comments from local citizens, you have to make it simpler and clearer.	determined in accordance with their policies. Consequently, the wording of policies and their supporting text must be specific as they can be subject to challenge.	
CON031	REP098		Shashan k	Virmani	3	LCA SA 10	<p>I believe that there are plans to build residential accommodation at the corner of Clarendon Rise/Slaithwaite road. I live at 153 Clarendon Rise. I am concerned that if the building is too high, and not planned appropriately, then there will be problems such as</p> <ol style="list-style-type: none"> 1. Obstructions to the light we and our neighbours receive. 2. Our privacy will be affected as a high development will be able to look into our rooms, especially those of our child and our neighbours children. 3. There will be an increase in traffic and pressure on parking in the street. <p>Please ensure that any development does not raise the height of the building as it stands.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan’s spatial strategy, site allocations and planning policies.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p>	No further actions required in relation to the new Local Plan.
CON032	REP099		Stacey	Lockyer	3	LCA SA 12	<p>I’d like to second Ewa’s email. I live on the ground floor of St Peter’s Gardens (flat 4) and I already have to have lights turned on at all times of the day due to the lack of light caused by the wall surrounding the building.</p> <p>I also work at home some days as many people do now which means I am based in the living room for 8 hours/day working and a further reduction in light would therefore be intolerable and reduce my quality of life and the value of my property.</p> <p>I also second Ewa’s point regarding the trees. At present birdsong can be heard within my flat and this would disappear should the trees be removed. The current view from my patio</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 12 Ladywell Play Tower.</p> <p>The new Local Plan Policy LCA SA 12 seeks the redevelopment of this site to secure a mixed-use development comprising main town centre, community, and residential uses. The redevelopment of the site will also secure the restoration and enhancement of the Grade II listed Ladywell Baths. The Council highlights that the latter building is currently on the</p>	No further actions required in relation to the new Local Plan.

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							<p>would also change from blue sky and a church to tall buildings, making it feel more enclosed.</p> <p>Overall I strongly object to the development.</p>	<p>Heritage at Risk Register. The redevelopment of the site provides a viable opportunity to restore the building and return it to an appropriate community use. The Council considers this approach to be sound.</p> <p>The Council notes the comment that redevelopment will harm the amenity enjoyed by neighbouring residents. This is an important consideration – however, it is beyond the scope of plan-making. Nevertheless, it is a matter that will be explored through the Council’s decision-taking responsibilities.</p>	
CON033	REP100	Sydenham Hill Residents			2	HE 01	On balance, we welcome the proposed principles for celebrating Lewisham’s historic environment and ensuring that the significance of the Borough’s heritage assets is fully understood, informing the design of development and only supporting development that preserves or enhances the significance of heritage assets and their setting (HE1 A p93). These principles are particularly pertinent to Sydenham Hill.	The Council welcomes the support offered in relation to the new Local Plan Policy HE 01 Lewisham’s Historic Environment.	No further actions required in relation to the new Local Plan.
CON033	REP101	Sydenham Hill Residents			3	HE 02	There is insufficient evidence-led reasoning for some decisions in relation to Sydenham Hill and its ridge. In particular, the failure to evaluate the area’s heritage of 18 th and 19 th century heritage buildings and their relationship to Crystal Palace; the extensive views over London and Kent; and its landscape and woodland character which have determined its contribution to London over centuries.	<p>The Council notes the comments made in relation to the new Local Plan Policy HE 02 Designated Heritage Assets. In particular, the suggestion that the new Local Plan has insufficient technical (heritage) evidence to support the policy approach towards designated Heritage Assets – specifically in relation the Sydenham Hill Conservation Area.</p> <p>For clarity, the new Local Plan provides the spatial strategy, site allocations and planning policy framework for decision-taking. It is informed by a proportionate but comprehensive suite of technical evidence. The Council maintains that the new Local Plan is justified and effective.</p> <p>The processes behind the identification and designation of Designated Heritage Assets, including Conservation Areas take place outside of the local plan-making process. This is inclusive of associated Conservation Area Appraisals and Management Plans. Subject to their preparation and adoption these can</p>	No further actions required in relation to the new Local Plan.

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								function in parallel to local plans and inform decision-taking. For these reasons the Council maintains that the new Local Plan is sound.	
CON033	REP102	Sydenham Hill Residents			3	LWA	We welcome the intention in the statements for the West area that “by 2040 the historic fabric, landscape and woodland character will be reinforced so that its neighbourhoods and centres retain their village qualities, including valued views towards London and Kent” (18.6, page 390). Nonetheless, it is disappointing that our requests to have the view from Sydenham Hill Ridge towards the City of London recognised have been overlooked and it continues to be omitted from the tables of London Strategic Views and Lewisham Local Landmarks. We ask for this to be accepted and reinstated (Lewisham Local Views, p802, Table 21.1).	<p>The Council notes the comments and welcomes the broad support offered in relation to the new Local Plan’s approach to the Lewisham West Area – specifically the LWA Vision Paragraph 18.6.</p> <p>In respect of the comments made in relation to the new Local Plan’s approach to the view from Sydenham Hill Ridge – this was a matter raised and addressed through the earlier Regulation 18 Consultation. The Council maintains that the new Local Plan’s policies on Building Heights and Views, in combination with the designation of Sydenham Hill Ridge as an Area of Special Local Character, provide an appropriate approach for managing landscape and topographical features of the ridge.</p>	No further actions required in relation to the new Local Plan.
CON033	REP103	Sydenham Hill Residents			2	HE 03	<p>Similarly, we welcome the strengthening of the principles for the preservation and enhancement of non-designated heritage assets (HE3 p. 102), but note that the Council has not taken the opportunity we requested in the last consultation to retain our designation of Area of Special Character, downgrading it to Area of Special Local Character (ASLC).</p> <p>We also note that the Tall Building Review 2023 still has not identified Sydenham Hill as unsuitable for such development despite its designation as an ASLC and the height of the land above sea level. We hope that the Council will cooperate with us to identify our area’s qualities with a potential for strengthened area designation.</p>	<p>The Council notes the comments and welcomes the broad support offered in relation to the new Local Plan Policy HE 03 Non-Designated Heritage Assets.</p> <p>In respect of the comments made in relation to the new Local Plan’s approach to the Area of Special Local Character this was a matter raised and addressed through the earlier Regulation 18 Consultation. The Council maintains that the new Local Plan’s policies on Building Heights and Views, in combination with the designation of Sydenham Hill Ridge as an Area of Special Local Character, provide an appropriate approach for managing landscape and topographical features of the ridge. For the purposes of clarity, a change in policy designation does not equate to a down-grading in approach.</p> <p>The Council remains committed to working with residents and communities across the plan-making and decision-taking process,</p>	No further actions required in relation to the new Local Plan.

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								and onwards into implementation and delivery.	
CON033	REP104	Sydenham Hill Residents			2	HO 01	With regard to HO1 (Meeting Lewisham's housing needs, p.109 ff), we welcome the focus on inclusive and mixed neighbourhoods and communities (page 110) and the recognition in HO1 F that developments which propose an overconcentration of 1 or 2 bedroom units on an individual site should be refused (p111). We have been concerned at the disproportionate increase in approvals for these in recent years, and consequent decrease in family units. It would be helpful to see an analysis of these developments over the last 20 years, compared with previous proportions.	The Council welcomes the support offered in relation to the new Local Plan Policy HO 01 Meeting Lewisham's housing needs.	No further actions required in relation to the new Local Plan.
CON034	REP105	Sydenham Society			3	LSA 01	<p>The Sydenham Society supports the objective of making the Bell Green and Lower Sydenham area a London Plan Opportunity area in a future update of the London Plan. However we would also like to see an emphasis on Bell Green/Lower Sydenham becoming a 'Cultural Quarter' as in Forest Hill. The Livesey Hall has long been a venue for music, dance and theatre and in recent years has hosted a number of events staged during the Sydenham Arts Festival (notably Spontaneous Productions' <i>When The Boys Come Home</i> - tracing the lives of those gasworkers who saw active service in the First World War and <i>The Colours of India</i> - an evening of Indian classical music and dance).</p> <p>Whirled Art Studios have recently taken space at 500-505 Southend Lane SE26 5BL, and the arts organisation V22 run Sydenham Community Library where they rent out space for studios. In discussions about the future of Sydenham Library they have said that they could let out more studio space if they could obtain it. In addition My Aerial Home is based at Unit 2 on the Bell Green Retail Park where, in addition to providing classes teaching circus skills, artists are also based - they've expressed a wish to take part in the 2023 Sydenham Artists Trail.</p> <p>In the view of the Sydenham Society, the designation of Bell Green and Lower Sydenham as a Cultural Quarter would increase employment opportunities in the area. The need for more studio space is evidenced by the existing demand in Forest Hill and Stansted Road.</p>	<p>The Council notes and welcomes the broadly supportive comments made in relation to the new Local Plan Policy LSA 01 Lewisham South Area Place Principles.</p> <p>The Council notes the suggestion that the potential future identification and designation of the Bell Green and Lower Sydenham area as an Opportunity Area (as part of the London Plan) provides momentum for the area also becoming a Cultural Quarter. The Council acknowledges that this could be a viable opportunity that merits further consideration through the plan-making process.</p> <p>The Council welcomes such suggestions and is committed to working with residents and communities and welcomes their involvement and support in promoting the proposal for the Opportunity Area.</p>	No further actions required in relation to the new Local Plan.
CON034	REP106	Sydenham Society			4	Schedule 1	<p>p 802, Table 21.1 LEWISHAM LOCAL VIEWS</p> <p>The view from Sydenham Hill Ridge towards the City of London is missing from the tables of London Strategic Views and Lewisham Local Landmarks. This view is as important as the Horniman Gardens view and should be reinstated</p>	<p>The Council notes and welcomes comments that identify potential omissions from the new Local Plan.</p> <p>The new Local Plan considers the matter of strategic and local views under Policy QD 05 View Management. This sets out the</p>	Review the content of Schedule 1 Figure 21.1 Strategic and local views, vistas, and landmarks. Determine whether any content has been omitted and amend accordingly.

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								approach for considering strategic and local views through the decision-taking process. London Strategic and Lewisham Local Views are identified on Figure 5.11. The designated Lewisham Local Views are listed under Schedule 1 Table 21.1. The Council will review the content of Table 21.1 and amend accordingly.	
CON034	REP107	Sydenham Society			4	Schedule 2	p 803, Table 21.2 CONSERVATION AREAS Sydenham Thorpes is missing from the schedule of Conservation Areas, as is the Thorpes Extension which takes in the commercial terraces of Sydenham Road and was designated in 2007.	The Council notes the comment and acknowledges that the Sydenham Thorpes Conservation Area has not been included as part of Table 21.2. This is an error that can be amended through modification. The Council notes the comment relating to the Thorpes Conservation Area extension – as extension is contiguous with the original extent of the Conservation Area there is no need to identify it separately.	Amend Schedule 2 Table 21.2 to include Sydenham Thorpes Conservation Area as a factual modification.
CON034	REP108	Sydenham Society			4	Schedule 3	p 805, AREAS OF SPECIAL LOCAL CHARACTER Longton Avenue and Lawrie Park are missing from the schedule of Areas of Special Local Character	The Council notes the comments made in relation to the new Local Plan Schedule 3 No-Designated Heritage Assets. Both Longton Avenue and Lawrie Park are located within the Sydenham Hill Ridge Area of Special Local Character. The new Local Plan identifies these Non-Designated Heritage Assets under Figure 6.2. The Council provides an interactive map on its website that provides an opportunity for those with an interest to further interrogate the designated Area.	No further actions required in relation to the new Local Plan.
CON034	REP109	Sydenham Society			4	Schedule 12	p 832 TALL BUILDINGS SUITABILITY ZONES The Sydenham Society disagrees with the maximum heights of buildings at the southern corner of the Bell Green gasworks site being set at 16 storeys; similarly the Worsley Bridge Road site at 12 storeys. These heights bear no relationship to their surroundings which, in the case of Bell Green, consist of Edwardian and inter-war terraces rarely exceeding two storeys (eg the streets leading off Perry Hill to the south and east).	The Council notes the comments made in relation to the maximum tall new building heights set out under Schedule 12 Tall Building Suitability Zones, and the possible maximum heights identified for the Bell Green Gasworks and Worsley Bridge Road Site Allocations. For clarity, the new Local Plan Policy QD 4 Building Heights addresses the matter of the possible maximum heights of new buildings. This sets out a policy approach for decision-taking that allows the consideration of proposals that have the potential to develop to the maximums identified. The policy approach, and the associated Tall Buildings Suitability Zones,	No further actions required in relation to the new Local Plan.

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								do not automatically favourable consider proposals that seek to develop to the maximum. Future proposals for tall new buildings will continue to be considered on their matters and in accordance with the new Local Plan. The Council maintains that this approach is sound.	
CON035	REP0110 a and b	AA Homes & Housing			5	GR 2 Schedule 7 Buckthorne Cutting, MOL	<p>1.1 This is a response to the proposal in the Proposed Policies Map (Jan. 2023) 1 to include land bounded by Courtra Road, Eddystone Road, rear boundaries of properties in Buckthorne Road and the New Cross to Forest Hill railway cutting in Crofton Park as Metropolitan Open Land. The site is part of that referred to as 'MOL Area W' in the Metropolitan Open Land Additional Sites Report² prepared by Arup for LBL. The response is on behalf of the landowner.</p> <p>1.2 LBL (website) say that Regulation 19 consultation responses are to be limited to the following aspects of the LLP:</p> <p>(i) Is the plan legally compliant? Does the plan comply with the relevant legislation and regulations in the way it has been prepared and in its content?</p> <p>(ii) Does the plan comply with the duty to co- operate? (refers to adj. LAs and prescribed bodies).</p> <p>(iii) Is the plan 'sound'; has the plan been positively prepared? Is it robustly justified and evidence led? Will it be effective in what it sets out to achieve? Is it consistent with regional and national planning policy?</p> <p>Whilst it is intended to address the criteria set out in (iii) it should be noted that this is one of nine additional proposed MOL sites that LBL have introduced at a late stage after Regulation 18 consultation of April 2021 (the Additional Sites document is dated 9.12.21 and the Proposed Policies Map, January 2023). Thus it is not considered that a response on these lately added proposals should be constrained in the manner that proposals forming part of the Regulation 18 consultation have been. Further to this, with regard to process, the LBL document 'Local Plan: Main Issues & Preferred Approaches'³ says, in para.104, 'Green Infrastructure': 'There are also areas of MOL which are designated through the London Plan.'. No further reference is made to MOL in this document so reading it one would assume that the intended vehicle for MOL designation was the London Plan rather than the Lewisham Local Plan.</p> <p>2.1 The site is rectangular in shape and measures a little over 1ha. It is bounded to the west by the cutting of an active</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy GR 2 Open Space; specifically, the designation of Metropolitan Open Land identified under Schedule 7: Designated open spaces.</p> <p>The Council notes the comment made in relation to the sequencing of the identification and designation of new Metropolitan Open Land during the Regulation 19 stage of plan-making. The Council considers it entirely normal for the Pre-Submission version of the new Local Plan to include new site allocations, land use designations and planning policies. Plan-making is an iterative and evolutionary process that is informed through engagement and by the passage of time (between formal consultation stages). The Council does not consider the respondent to have been disadvantaged as they have made representations to the Regulation 19 consultation and have further opportunities to participate in the Local Plan examination process. For that reason, the Council concludes that the new Local Plan is legally compliant.</p> <p>The Council highlights that the London Plan Policy G3 Metropolitan Open Land states – <i>"Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt: 1) MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt; 2) boroughs should work with partners to enhance the quality and range of uses of MOL"</i>.</p>	No further actions required in relation to the new Local Plan.


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							<p>railway line and to the east by the back gardens of houses in Buckthorne Road (mainly two storey, terraced late Victorian). It is bounded to the south by a cul-de-sac (Courtraï Road) which terminates in front of the site. To the north is a pedestrian/cycleway- Eddystone Road- leading to a bridge over the railway. At the south end, some 20m from Courtraï Road, is a single storey building of 290m2 previously used as a Scout hut. It is in poor condition.</p> <p>2.2 It is relevant to the case being made here to understand that the site has two parts. To the south, taking up some 20% of the site, is a single storey building built post-war as a Scout hut and its curtilage. On the remainder of the site is an embankment, in parts some 3-4m higher than the surrounding ground to the east. The two parts are divided by a chain-link fence with concrete posts. This division of the site into two distinct parts is clearly seen in the Ordnance Survey map of 1893-18964. It is likely that the embankment is made-up land, consisting of spoil created from the excavation of the Croydon Canal (1809-1836) which occupied what is now the adjoining railway cutting. n.b. there is a similar embankment on the opposite side of the railway cutting. The 1893/6 OS map does not show a building where the Scout hut now stands and the reason for this division within the site is not known. It is notable that this OS map illustrates trees on the ‘Scout hut curtilage site’ but not on the embankment.</p> <p>2.3 It is not this objector’s case that the site does not have merit in terms of biodiversity; it may be that the owner’s non-intervention has contributed to that biodiversity; that the land has been ‘rewilded’. The site was designated a Site of Metropolitan Importance for Nature Conservation in the extant local plan. It should be said that this is 1 hectare out of 614ha of SINC in Lewisham, over 63 sites according to the Lewisham SINC re-survey report of 1/15-5/16 by the Ecology Consultancy5. Exactly what the contribution to biodiversity is made by this particular site is unclear. The Ecology Consultancy say Tractside botanical surveys have been recommended at the Forest Hill to New Cross Gate Railway Cutting to provide further information on species present. This was difficult to ascertain from bridges and adjacent boundaries.’ They calculate that the railway cutting as a whole contains 11.8ha of woodland and say that over half of this is non-native woodland, commenting that ‘..native woodland is naturally more valuable to wildlife.’ Similarly Arup in their additional sites review say, of ‘Area W’ in particular, ‘The assessment is based on aerial photography and limited views from the public highway..’</p>	<p>The London Plan continues by stating that –</p> <p><i>B The extension of MOL designations should be supported where appropriate. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria: 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area</i></p> <p><i>2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London</i></p> <p><i>3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value</i></p> <p><i>4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.</i></p> <p><i>C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B”.</i></p> <p>The Council considers that its plan-making in preparing the new Local Plan has closely followed and is in accordance with London Plan Policy G2.</p> <p>Within this respect the Council has as part of its plan-making activities prepared, produced, and published technical evidence that assesses candidate land proposed for designation as Metropolitan Open Land. The Council notes that the comments question the veracity of the technical evidence. In response, the Council notes that no alternative technical evidence has been submitted to provide a</p>	

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							<p>2.4 Arup rely on their assessment as they describe it above to argue that 'Area W' meets the Mayor of London's criteria for designating MOL as set out in policy G3(B) of the London Plan 20215, viz.</p> <p>The extension of MOL designations should be supported where appropriate. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:</p> <p>1) It contributes to the physical structure of London by being clearly distinguishable from the built-up area 2) It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London 3) It contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value 4) It forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria.</p> <p>In the objector's view it is questionable that the observations of the site made by both of these firms of consultants merit being called the proportionate evidence required to be characterised as being 'robustly justified and evidence-led.'</p> <p>2.5 In the case of the Arup study which relates directly to the MOL proposal they place reliance on the assumed biodiversity of the site to say that criterion 3) of the London Plan policy as quoted above is met. However on p.90 of their report they say that the site scores as 'moderate' in their assessment because the whole parcel has metropolitan diversity value. i.e. the value of the site in terms of biodiversity is dependent on its relationship with other sites. There does not appear to have been any new ecological survey of the site and it appears that its biodiversity merits, according to Arup, are based on the local plan designation (the extant local plan having been published in 2005). Indeed, in reference to the Buckthorne Cutting Nature Reserve (part of 'Area W') Arup advise that '..no access was available during the site visit.' n.b. the author(s) of the Additional Sites Report are not identified and it is not stated that an ecologist was involved in its preparation.</p> <p>2.6 The 1945 post war aerial photographic survey of London 8 shows that a substantial part of the site did not have trees; the 1893-6 OS map shows trees on the 'Scout hut' site (pre Scout hut) but not on the remainder and mapping of 1798-1809</p>	<p>contrary assessment. The Council maintains that the proposed designation of the New Cross Cuttings and Embankments, and the Buckthorne Road Nature Reserve as Metropolitan Open Land is justified as the place <i>contributes to the physical structure of London by being clearly distinguishable from the built-up area and contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value.</i></p> <p>For clarity, the Council highlights that the land in question, M122 Forest Hill to New Cross Gate Railway Cutting is already designated as Metropolitan Site of Importance for Nature Conservation (SINC). The land was designated as such in 2016 and is described in the citation as <i>"One of the best series of rail side habitats in London. Combining three nature reserves, wide wooded cuttings, of value to a wide range of species"</i> and as such being <i>"the most representative site in London for habitats developing on active rail sites"</i>.</p> <p>Furthermore, it is noted that Natural England are in the process of designating part of the land in question as Ancient Woodland.</p> <p>The Council notes the comments made in relation to the Scout hut, which sits within the proposed Metropolitan Open Land and within the already designated Metropolitan SINC. The respondent suggests that the Scout hut site is brownfield land and as such should not be designated as Metropolitan Open Land. This is a mistaken conclusion as both Green Belt and Metropolitan Open Land can include buildings or structures. These can include sports changing facilities and club houses. It is logical that a Scout hut could be legitimately located within Green Belt or Metropolitan Open Land.</p>	

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							<p>appears to show the site as fields north of woodland. Additionally we are advised (Re-survey of SINCS in Lewisham5) that the majority of trees in the New Cross to Forest Hill cutting are non-native, so this piece of land does not appear to be an arboricultural asset of great antiquity and value consequent on age. The site does not appear on the Woodland Trust's Ancient Tree Inventory or Natural England's equivalent record woodland and trees. Nevertheless it has been referred to by some as ancient woodland. This respondent's view is that as the site is believed to be substantially formed of spoil from the canal/railway cutting that on site trees would post-date those excavations in the early 19th century. The site does however have an area Tree Preservation Order covering the wooded embankment and individual TPOs and a group TPO covering trees within the Scout hut curtilage.</p> <p>3.1 It is not clear to the objector what the purpose of designating this site as MOL would be. There are strong development management and arboricultural controls exerted by the SINC and TPOs. In their 'Strategy and recommendations' for Area W Arup say: 'The parcel's local recreational and metropolitan biodiversity value should be conserved. The recreational value of the parcel could be significantly enhanced through providing pedestrian routes north to south parallel to the railway line.'</p> <p>3.2 The Arup conclusion is thus not suggesting action should be taken vis a vis biodiversity and 'local recreational value' merely that the status quo be conserved. With regard to 'pedestrian routes' it is important to look at the configuration of 'Area W'. North of Eddystone Road the site consists of the substantial railway cutting plus a strip of land some 50m wide. The same applies to the site between Eddystone Road and Courtrai Road, the site whose inclusion as MOL is being contested here. But south of Courtrai Road the site is the railway cutting only. If the suggested path is to go to its logical end- Honor Oak station- it would be within operational railway land. Whether Network Rail would find this acceptable is a question for them. To achieve a recreational path over the whole north-south extent of the site would mean either it being within the railway cutting throughout or 'dog-legging' from the cutting south of Courtrai Road into the Scout hut curtilage.</p> <p>3.3 It is unclear to the objector what bearing an MOL designation would have on the sole aspiration for change in Area W- recreational path(s). No such linkage is made in the evidence in the Metropolitan Open Land Review. Whilst some large open spaces- Beckenham Palace Park for example- can</p>	<p>It is also highlighted that the Crofton Park and Honor Oak Park (Hopcroft Plan) 2017-2027 (May 2022), identifies the Scout hut site as a Community Facility protected by Neighbourhood Plan Policies C1 and C2.</p> <p>For these reasons the Council conclude that the extension of the Metropolitan Open Land to include the New Cross Cuttings and Embankments, and the Buckthorne Road Nature Reserve, inclusive of the designated Metropolitan SINC M122 Forest Hill to New Cross Gate Railway Cutting (which includes the Scout hut site) is sound.</p>	

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							<p>accommodate both biodiversity and recreation that is hardly the case here where the site is predominantly dense woodland. Recreational activity of any substance here may well be to the detriment of the existing eco-system.</p> <p>4.1 Focussing on the longstanding sub-division of the site between the Scout hut and curtilage and the remainder, the objector is of the view that the former is previously developed or 'brownfield' land. It meets the definition of such land set out in Appendix 2 of the NPPF being: 'Land which is or was occupied by a permanent structure, including the curtilage of the developed land..' whilst the Scout hut is not in a good condition it is not in the excluded from brownfield land status category '..where the remains of the permanent structure or fixed surface structure have blended into the landscape.' Inasmuch as an MOL designation may be seen as being incompatible with the government's general approach to brownfield land it is inappropriate for the Scout hut and curtilage.</p> <p>4.2 The objector does not take the view that the part of the site outwith the Scout hut curtilage is brownfield land. However, neither cartographic resources or aerial photography suggest that it is some sort of remnant of historic forest (although of course centuries ago it may well have been wooded). As set out in 2.6 above we think it unlikely that trees on the embankment on this part of the site are likely to be more than two hundred years old. The metropolitan SINC designation, albeit that no site walkover was undertaken in the 2016 SINC review, is considered to be sufficient protection for this part of the site (along with the TPO).</p> <p>5.1 In conclusion it is considered that the site in question should be considered to consist of two parts. The scout hut and its obvious curtilage as delineated by a fence is undoubtedly brownfield land. As MOL is deemed equivalent to Green Belt the relevant NPPF policies should be paid heed to. MOL designation would serve none of the five purposes of Green Belts as set out in para.134. Green Belt designation must a) demonstrate why normal planning and development management policies would not be adequate (para. 135). In our view such policies along with the TPOs and SINC designation are perfectly sufficient protections for this site and the contrary has not been demonstrated. The exclusion of the Scout hut and curtilage from MOL designation does not preclude there being a strategic green corridor. It merely makes it equivalent to the land within 'Area W' south of Courtrai Road which is formed of the railway cutting only.</p>		

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							<p>5.2 As to that part of the site north of the Scout hut and curtilage it is not the respondent's case that it is also brownfield land. Nevertheless there is concern that the evidence used by LBL to demonstrate compliance with London Plan policy G3B is not robust and evidence led. The marking by Arup of 'Area W' as 'moderate' in terms of the biodiversity component of London Plan policy G3(B)(3) is inadequately evidenced and is not the product of any contemporary scientific research. The strategic corridor referred to in London Plan policy G3(B)(4) is the railway cutting. The respondent's site is separated from the parts of Area W to the north and south by Eddystone Road and Courtrai Road respectively and is not a contiguous corridor for wildlife, unlike the railway cutting which is.</p> <p>References 1 LBL Regulation 19 Policies Map 2 LBL Metropolitan Open Land Review 'Additional Sites Report' by Arup 9.12.21 3 LBL Local Plan: Main Issues and Preferred Approaches January 2021 4 Ordnance Survey Map 1893-1896 5 Re-survey of Sites of Importance for Nature Conservation in Lewisham: Habitat Surveys by The Ecology Consultancy January 2015-May 2016 6 London Plan 2021. Mayor of London 7 Tree Preservation Order confirmed 26.3.98 8 1945 War Department aerial survey</p>		

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CON036	REP111	Rolfe Judd OBO Apex Capital Partners			3	LSA SA 01	<p>Allocation LSA3 (1) Former Bell Green Gas Holders and Livesey Memorial Hall Apex Capital Partners own the Livesey Memorial Hall and part of the former Bell Green Gas Holders, alongside a separate housing developer. As such, they are a significant landowner within the site allocation area.</p> <p>The site is subject to draft allocation LSA3(1) for a <i>‘Comprehensive mixed-use redevelopment with compatible residential, commercial main town centre and community uses. Refurbished community facilities in heritage assets at Livesey Memorial Hall site. Public realm and environmental enhancements, including new walking and cycle routes, and public open space.’</i></p> <p>We are supportive of the allocation from the adopted Local Plan (Policy SA26) being retained and updated within the Draft Local Plan. We are also pleased to see that the allocation has been extended from the Reg-18 Draft Local Plan, to re-include the Livesey Memorial Hall and wider site.</p> <p>Apex Capital Partners are currently proposing redevelopment of part of the site to provide residential development, new walking and cycling routes and public open space. As part of this we are proposing to protect and refurbish the Livesey Memorial Hall and associated bowling green to reinstate a community use at the site. This aligns with the Council’s overarching vision for the site, as set out in Allocation LSA3(1).</p> <p>A site plan, confirming the site’s ownership boundaries and indicative layout of the scheme promoted by our client is shown below. 2 LB Lewisham Draft Local Plan Regulation 19 Consultation April 2023</p>  <p><i>Figure 1: Site Plan: Ownership – Prepared by Weston Williamson + Partners</i></p> <p>Development Requirements:</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy LSA SA 01 Former Bell Green Gas Holders and Livesey Memorial Hall. The Council remains committed to working with its development industry partners to secure growth and good quality place-making in accordance with the new Local Plan.</p> <p>The Council welcomes the timely delivery of the site allocation; the proposed restoration of the Livesey Memorial Hall and its associated bowling green; reinstatement of community uses; implementation of new infrastructure networks including pedestrian and cycle routes, and open space; and the delivery of new residential accommodation.</p> <p>Provision of Master Plan The Council notes the comments made in relation to this matter. The requirement that site allocations in multiple ownerships be delivered through a master planning process, with the landowners working together, is an established local plan mechanism for securing growth and good quality place making. It is entirely reasonable for the Council, as local planning authority, to require that landowners work together to secure comprehensive. The respondent has provided no evidence to demonstrate that this is not reasonably possible for this site allocation. Consequently, the Council maintains that the policy is sound.</p> <p>Suitability for Tall New Buildings The new Local Plan addresses this matter through Policy QD 04 Building Height. The Council maintains that the policy approach to this matter is sound – being justified and effective. Although the respondent has referred to the gas holder structures that were historically present on this site, the council maintains that these do not establish a pattern for tall new buildings.</p>	<p>The Council will contact the site allocation promoter with the objective of securing a signed SoCG that identifies matters of agreement between the parties and a delivery trajectory.</p> <p>The Council will consider a modification to Policy LSA SA 01 Paragraph 17.18 6 – subject to it being demonstrated as necessary to ensure soundness -</p> <p><i>“The site is constrained by existing utilities restrictions, easements; a Hazardous Substances Consent; a former gas holder and significant service infrastructure that supported its former use, including a gas mains and gas ‘governor’ and a bentonite wall. Ground surveys will need to identify the nature and extent of ground contamination and environmental pollution, with remedial works and/or mitigation measures implemented, where necessary, in partnership with utility providers. The Council recognises the challenges associated with significant decontamination and remediation of the site, and when necessary, will play a proactive role in the revoking of the Hazardous Substances Consent (HSC).”</i></p>

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							<p>The draft allocation specifies a capacity of 100-442 new residential units. It should be noted that while the site is allocated as one land parcel, it is subject to multiple ownerships and therefore parts of the site could be delivered separately, rather than a single development across the whole allocation area.</p> <p>This is recognised in Part 1 of the development’s requirements, which states that landowners must work in partnership, to ensure appropriate co-location, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). This is supported; however, we suggest that the wording is amended to state:</p> <p><i>‘Where appropriate, landowners must work in partnership and in accordance with a master plan for the wider Bell Green and Lower Sydenham area and including a site masterplan, to ensure appropriate co-location, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). It is recognised that developments may come forward at different timescales and in some circumstances, detailed partnerships may not be possible.’</i></p> <p>Part 2 states that the site must be fully re-integrated with the surrounding street network, including Perry Hill to the west, Alan Pegg Place to the south and forthcoming development to the east, to improve access and permeability in the local area, with enhanced walking and cycle connections between public spaces and the site’s surrounding neighbourhoods. This is supported and aligns with our client’s wider, landscape led, approach. The scheme promoted by our client will link the site to an existing SINC to the north, which is referenced as an aspiration of the Council in Part 3 of the site allocation’s development requirements. Delivery of a new public realm here, in collaboration with the Council, to produce a ‘woodland walk’ towards the Bellingham Play Park and Poole River link would be of beneficial use for local residents without impacting on the on-site heritage assets of the Hall and Bowling Green.</p> <p>Part 4 seeks developers provide a positive frontage to Alan Pegg Place and to the southwest corner at the junction of Alan Pegg Place and Perry Hill. This is supported and mirrors the scheme promoted by our client which provides ground floor active frontages and a gateway entrance to the site and its valuable community resources.</p>	<p>The Council maintains that future new development on this site allocation must be guided by Policy QD 04 and the associated Tall Building Suitability at Figure 5.1.</p> <p>Livesey Memorial Hall and Open Space Provision The Council notes the comments and suggested changes to the development requirements set out under supporting text paragraph 17.18 5. The Council understands why this has been suggested. However, the application of a master planning process for the wider provides an opportunity for open space siting options, and their suitability, to be fully assessed. This is a sound design-led approach.</p> <p>Remediation of Hazardous Substances The Council notes the comments made in relation to this matter. The Council could consider a modification to the policy, as suggested by the respondent, subject to amendments being necessary to ensure soundness.</p>	

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							<p>Part 6 relates to these valuable community resources, stating that development must be sensitive to the setting of the listed Livesey Memorial Hall and its curtilage open spaces and structures, and the listed boundary wall and War Memorial, and should incorporate it into the wider townscape by creating a positive relationship with new development. This is a key part of the scheme promoted by our client and the Council's objective of retaining the Hall and its heritage significance is supported. The scheme promoted by our client ensures the character of the Livesey Memorial Hall, inside and outside, remains and can be repurposed for the future community use.</p> <p>The final point of the site allocation's development requirements refers to the site's history and heritage relating to the South Suburban Gas Works. We support for this history to be revealed through the heritage assets and their curtilage and through hard and soft landscaping, architecture, public art and street/place naming, however as the larger site is within multiple ownerships, a sitewide strategy is unachievable. We suggest the wording removes reference to a sitewide strategy and is amended as follows:</p> <p><i>'The history and heritage of the South Suburban Gas Works site should be revealed through a site wide interpretation strategy including the heritage assets and their curtilage, re-use of the retained elements of the gasholder structures, and through hard and soft landscaping, architecture, public art and street/place naming.'</i></p> <p>Developer Guidelines Guidelines Comments</p> <p>1. Guideline supported however eastern links would depend on ownership and proposals of neighbouring site allocations. We consider the wording should be rephrased to include: <i>'in co-ordination with neighbouring site allocations where appropriate'.</i></p> <p>2. The London Plan commits to extend the Bakerloo line on the Underground (tube) from Elephant and Castle to Lewisham via Old Kent Road and New Cross Gate. It is not confirmed when this extension will be implemented, and it is unlikely to happen in the next decade. The site benefits from very good public transport accessibility with several bus routes passing the site and a short walk to Lower Sydenham Station. Improved public transport in the area is supported and supports the wider intentions of the site allocation and neighbouring site allocations.</p>		

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							<p>The development currently being promoted by our client makes optimal use of the site and would not significantly impact on existing public transport capacity.</p> <p>3. This guideline is not appropriate in line with site's context, multiple landowners and allocations vision for the site to be landscape led with enhanced walking and cycle connections. We recommend this guideline is removed.</p> <p>4. This guideline is supported and development at the site should respond to the surrounding context, which varies in scale and massing. It is considered that taller buildings are also appropriate on the southern part of the site, where it sits away from heritage assets and adjacent to other adjacent development sites, namely Orchard Court. Notwithstanding this, the former gasholder structures on the site were tall structures and act as the context for the massing relationship to the Livesey Hall.</p> <p>We suggest the wording is rephrased to include: 'Tall buildings may be considered along the site's eastern and southern boundary, where they can be designed so as to contribute positively to the street-scene and without detriment to the heritage assets on site. The former gasholder structures on the site were tall structures and act as the context for the massing relationship to the Livesey Hall.'</p> <p>5. This is a key part of the scheme being promoted by our client and the objective of retaining the Hall and its heritage significance is supported. The emerging scheme promoted by our client will protect the Livesey Memorial Hall, both internally and externally and will ensure it can be used for future community use. However, when seeking to retain both the historic structures and important open areas the allocation should acknowledge the need to balance the safeguarding of the Livesey Memorial Hall as well as the need to deliver much needed housing in line with the site allocation.</p> <p>We suggest the wording is amended to the following: 'Public realm and open space should form an integral part of the design of the site. ensuring that, Subject to appropriate justification, the open spaces in the curtilage of the Livesely Memorial Hall to the north (bowling green) and south (tennis courts) will be sought for retention are retained as open space, ancillary to the use of the hall.'</p> <p>Public access is supported and aligns with the owner's wider landscape led approach. The emerging scheme promoted by</p>		

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							<p>our client will link the site to an existing SINC to the north of the site. Delivery of a new public realm here, in collaboration with the Council, would be of beneficial use for local residents creating a 'woodland walk' towards the Bellingham Play Park and Poole River link without impacting on the on-site heritage assets of the Hall and Bowling Green.</p> <p>6. This guideline is supported however it should also acknowledge that the Health and Safety Executive (HSE) would need to be party to the revoking of the Hazardous Substances Consent (HSC) and that the license as we understand it can only be revoked by Lewisham Council. We have experience of other gasholder facilities where a Grampian-style planning condition prevents occupation of the development until the license has been revoked. There may be compensation associated with the revoking of such license. We suggest the wording is rephrased to include: 'The Council recognises the challenges associated with significant decontamination and remediation of the site and the Council will play a proactive role in the revoking of the Hazardous Substances Consent (HSC).'</p> <p>7. This guideline is supported.</p> <p>8. This guideline is supported, acknowledging that this condition is applied to all applications associated with the site to ensure that all development appropriately contribute to the upgrading of utility capacity.</p> <p>Conclusions To summarise, we suggest several amendments to the wording of the site allocation. These are summarised in the table below.</p> <p>17.17(1) 'Where appropriate, landowners must work in partnership and in accordance with a master plan for the wider Bell Green and Lower Sydenham area and including a site masterplan, to ensure appropriate co-location, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). It is recognised that developments may come forward at different timescales and in some circumstances, detailed partnerships may not be possible.'</p> <p>17.17 (7) 'The history and heritage of the South Suburban Gas Works site should be revealed through a site wide interpretation</p>		

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							<p>strategy including the heritage assets and their curtilage, re-use of the retained elements of the gasholder structures, and through hard and soft landscaping, architecture, public art and street/place naming.'</p> <p>17.18(1) 'Development should deliver a more cohesive street pattern, in coordination with other neighbouring site allocations where appropriate. There is an opportunity to open up new walking and cycle links to the east and south of the site, to create a legible and more permeable network of routes that connect to the surrounding neighbourhood areas.'</p> <p>17.18(3) 'Applicants should consider increasing bus services through the site, in partnership with TFL.'</p> <p>17.18(4) 'Development should be designed to provide an appropriate transition in bulk, scale and massing through the site and from the site to its surrounds, which are predominantly suburban in character to the north and west. Tall buildings will not be appropriate in the western part of the site where maintaining the setting of the heritage assets should be prioritised. Tall buildings may be considered along the site's eastern and southern boundary, where they can be designed so as to contribute positively to the street-scene and without detriment to the heritage assets on site. The former gasholder structures on the site were tall structures and act as the context for the massing relationship to the Livesey Hall.'</p> <p>17.18(5) 'Development must retain the listed structures at the west of the site and incorporate them sensitively into the redevelopment of the remainder of the site in a way that enhances their setting and improves access to the Livesey Memorial Hall. The hall should continue to be a focal point within the design of the site and be used as a community asset. Public realm and open space should form an integral part of the design of the site ensuring that,. Subject to appropriate justification, the open spaces in the curtilage of the Livesely Memorial Hall to the north (bowling green) and south (tennis courts) are retained will be sought for retention as open space, ancillary to the use of the hall. Public access through and from the site to the nearby Waterlink Way and SINC should also be integral to the site's layout and design.'</p> <p>17.18(6)</p>		

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							<p>'The site is constrained by existing utilities restrictions, easements; a Hazardous Substances Consent; a former gas holder and significant service infrastructure that supported its former use, including a gas mains and gas 'governor' and a bentonite wall. Ground surveys will need to identify the nature and extent of ground contamination and environmental pollution, with remedial works and/or mitigation measures implemented, where necessary, in partnership with utility providers. The Council recognises the challenges associated with significant decontamination and remediation of the site and the Council will play a proactive role in the revoking of the Hazardous Substances Consent (HSC).'</p> <p>In conclusion we are supportive of draft LSA3(1). The site provides great opportunity to restore a community use and contribute to the recognised housing need. We would welcome the opportunity to meet with the Lewisham Policy Team to review the matters raised above and collectively work towards the formulation of a positive planning policy framework.</p>		
CON037	REP0112 a and b		Richard	Rigg	3	LNA 04 LNA SA 17	<p>I have a few concerns with regards to the proposed Local plan for Creekside, I work from the above address 4 days a week and do require access for loading unloading equipment into the yard at the double steel gates at the corner of 6 Creekside, I as well as the majority of studio members (who number 42 in total) need this on occasion so is in very regular use.</p> <p>Any street furniture around this area would greatly impede delivery and pick up of large Artwork, so this area does really need to be clear of signage and furniture, it also serves often as a passing place for larger vehicles and I would think still form this function because of the turning circle.</p> <p>Can the number of free parking spaces remain the same, any allocated spaces could be extra, but this is again to support local business and residents, it would be good to retain some idea of a 'working' street co-existing alongside its residents.</p> <p>Is it possible just to mend and make good rather than the general 'modern' look which is at odds with the character of</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 17.</p> <p>The comments made in relation to the public realm; street furniture; signage and future parking provision are noted. For clarity, the policy sets out the Development Requirements for the redevelopment of the site under supporting text Paragraph 15.100. The policy requires that new development delivers new and improved public realm and open space, in accordance with a site-wide public realm strategy. The possible car parking requirements for future development will be considered under new Local Plan Policy TR 4 Parking. These are matters for the decision-taking process.</p>	No further actions required in relation to the new Local Plan.

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							<p>the area which has such a rich history, it feels like it may be sterilizing the area, improvements are needed so I'm fully behind the intention here, but I think it could be done in a more sympathetic manner, and the street to keep its distinctive feel,</p> <p>Although not directly mentioned in this proposal, the proposed development at 5-9 Creekside is a example of an unsympathetic building, I fully appreciate housing is required but this could be on any generic modern street, whilst supporting only 35% 'affordable housing' this should be entirely affordable housing.</p> <p>APT has been at 6 Creekside since 1995, and maintains and looks after the historic buildings their and grounds, as the stated and shared aim is to both retain and look after the unique industrial and cultural heritage of this specific area, it's very important that it can retain as much of its identity as possible.</p>	<p>The Council concludes that the policy is sound.</p> <p>In respect of secure good quality places through new development, the Council remains committed to the delivery of good quality building design. The policy seeks to achieve this through the master planning and design-led approach. The new Local Plan will guide the process through a variety of policies including DM3 Masterplans and Comprehensive Development, and QD1 Delivering high quality design in Lewisham.</p>	
CON038	REP113	Avison Young OBO Artworks Creekside			3	LNA SA 17	<p>The key issue in the representations relate to draft Site Allocation 17 (Lower Creekside Locally Significant Industrial Site) and the approach to site capacity, and detailed comments contained within the development guidelines. We also make comments on the Council's approach to LSIS sites and ensuring consistency between policies. Further details comments are contained with the representations.</p> <p>LEWISHAM LOCAL PLAN: REGULATION 19 CONSULTATION: WRITTEN REPRESENTATIONS OBO Artworks Creekside These representations are made on behalf of our client, Artworks Creekside, in relation to the Regulation 19 Local Plan Consultation: Main Issues and Preferred Approach to Proposed Changes to the Adopted Policies Map being undertaken by the London Borough of Lewisham. The consultation material comprises:</p> <ul style="list-style-type: none"> • Local Plan: Proposed Submission Document – January 2023; • Policies Map – January 2023; • Schedule of Proposed Changes to the Adopted Policies Map – December 2022 • Habitats Regulation Assessment – December 2022; • Integrated Impact Assessment and associated Non-Technical Summary – December 2022: • Draft Infrastructure Delivery Plan; and • Relevant Evidence Base, including the Tall Building Review (2023), Tall Building Addendum (2022) and Draft Tall Building Study (2021), Lewisham SHMA (2022), Employment Land Review (2019), Site Allocations background paper (2021) and Residential Density Technical Paper (2020). 	<p>The Council notes Artworks Creekside's introductory comments including context of the site and surrounding area.</p>	<p>No further action required in relation to the new Local Plan.</p>

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							<p>We have noted the scope of changes from the Regulation 18 version of the draft Local Plan and the accompanying evidence base documents. Where substantial changes are made between Regulation 18 and Regulation 19 versions of the document, we comment below.</p> <p>As a reminder, Artworks Creekside support the Vision for Lewisham as set out in the Local Plan, that Deptford will emerge as a cultural hub and that the Council will supports local businesses, arts and cultural establishments, and where people thrive. The Strategic Objectives which accompany the Vision support the creation of inclusive, mixed and balanced neighbourhoods, making the best use of employment land to increase the number of jobs and provide suitable spaces for businesses, and making optimal use of land through the regeneration of Opportunity Areas.</p> <p>Context of the Representation This section summarises the site and surrounding area and outlines the emerging scheme proposals at for the sites under the ownership of Artworks Creekside. The extent of these sites are shown in Appendix I.</p> <p>Site and Surrounding Area 2 Creekside 2 Creekside is a 4 storey building, known as The Birds Nest public house and the associated land. The building has a partial basement, and this space alongside the ground floor is used as the public house (Sui Generis). At first and second floor is an ancillary hostel / HMO which is accessed through via an internal stairway from the ground floor. The third floor is occupied by a flat which benefit from an external amenity space. The building is in a poor condition and has suffered from a lack of investment having been through various ownerships in the recent past. The public house trade has suffered from changing national trends and the Birds Nest has been affected by this. The land associated with the building is currently in a mixture of commercial and employment generating uses. The Big Red is a static double-decked bus which last operated as bar and pizzeria, and which made use of external seating between the building and the DLR railway viaduct which runs to the south of the site. The eastern portion of the site is occupied by 8no. shipping containers which accommodate a range of creative business enterprises, and which provide affordable and flexible small commercial premises. An application is currently being considered by the Council under ref: DC/22/125897</p>		

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							<p>“Detailed planning permission for the demolition of the Bird's Nest Pub with retained north and west façade and its redevelopment for a new public house (Sui Generis) and commercial units (Class E) at ground floor, and the delivery of residential units (Class C3) on all other floors, together with access, servicing / yard space, cycle parking, amenity space and refuse provision and associated works”</p> <p>3 Creekside 3 Creekside includes a 2 storey building and associated single storey structures and is locally known as Medina Works. The building and the land associated are current used by a mixture of business as an art gallery, studio, café, creative workspaces and social space for the local community. The building benefits from large internal volumes with open floor plans and floor-to-ceiling heights. The site does not include the two-storey warehouse structure topped with a double gabled roof directly to the north of 3 Creekside, and this falls within separate ownership under the postal address of 5-9 Creekside. We have worked with the development team on this adjacent site in order to bring forward a masterplan led redevelopment strategy.</p> <p>An application is currently being considered by the Council under ref: DC/23/129784 for the: “Detailed planning permission for the demolition of existing buildings and structures on land at 3 Creekside, SE8 with retained southern façade of the Medina Works building, and the redevelopment of the site to provide commercial units (Class E) at ground and upper floor and residential units (Class C3) on all other floors of the front building, and residential units within the Addey Street building, together with access, servicing/yard space, cycling parking, amenity, refuse provision and other associated works. Further detailed explanation (not forming part of the formal description of development) is set out below: * 38 residential units (Use Class C3) * 622.1 sqm of commercial floorspace (Use Class E) * Maximum building height of 29.89m”.</p> <p>In both instances, the applications seek to deliver the following development objectives:</p> <ul style="list-style-type: none"> • The creation of creative workspaces which align with their track record and approach to such spaces elsewhere: • The delivery of an employment-led mixed-use development that responds to the Council’s emerging policy designation and which deliver significantly more jobs than the existing site: 		

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							<ul style="list-style-type: none"> • The integration of the development into the emerging Creative Quarter that the Council has identified for Creekside, and for the wider Deptford Area: • The successful integration of the Birds Nest public house into a development, and the provision of a viable public house which can act as a community hub: • A series of commercial and employment areas which are financially sustainable: • Residential development which assists in creating a vibrant community and achieves a successful mixed-use development. 		
CON038	REP114	Avison Young OBO Artworks Creekside			2	OL 01	<p>Comments on Local Plan Main Submission Document</p> <p>A series of comments are provided below in respect of various sections of the Local Plan Main Submission Document which are of relevance to the proposed redevelopment of 2 Creekside and 3 Creekside.</p> <p><i>Draft Policy OL1 - Delivering an Open Lewisham (spatial strategy)</i></p> <p>Artworks Creekside strongly support the continued strategy to deliver an Open Lewisham as set out in draft Policy OL1, in particular the continued strategic objective of ensuring that the growth and regeneration potential of Lewisham's Opportunity Areas, including Deptford Creek / Greenwich Riverside, are fully realised (part a), and the continued promotion of the optimisation and intensification of Strategic Sites and brownfield land for new housing and workspace (Part f) will ensure that development potential is able to be maximised and will encourage the most efficient use of land Artworks Creekside continues to also support Part g of the draft policy which requires development to be delivered through a design-led approach which is informed by an understanding of the local area character in order to secure liveable communities that are inclusive to all.</p>	The Council notes and welcomes the continued strong support offered by Artworks Creekside in relation to the new Local Plan Policy OL1 Spatial Strategy.	No further action required in relation to the new Local Plan.
CON038	REP115	Avison Young OBO Artworks Creekside			2	QD 01	<p><i>Draft Policy QD1 – Delivering high quality design in Lewisham</i></p> <p>The policy advocates a design-led approach to development which ensures that the review of design options at an early stage of the development process are informed by an understanding of the local context. Our planning discussions with Council Officers to date have been undertaken on an iterative process and which has sought to understand the local context first, before then building a re-development strategy that responds to the specific characteristics found within Creekside. We continue to support the qualitative criteria contained with the remainder of the updated Policy.</p>	The Council notes and welcomes the continued strong support offered by Artworks Creekside in relation to the new Local Plan Policy QD 01.	No further action required in relation to the new Local Plan.
CON038	REP116	Avison Young OBO			2	QD 04	<p><i>Draft Policy QD4 – Building heights</i></p> <p>Figure 5.1 identifies locations which are suitable for tall buildings. Artworks Creekside welcome and support the identification of Creekside as a location which is suitable for the development of tall buildings. This reflects its position</p>	The Council notes and welcomes the support offered by Artworks Creekside in relation to Creekside being identified as a location for tall buildings and parts A and C	No further action required in relation to the new Local Plan.

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		Artworks Creekside					<p>within the Deptford Creek / Greenwich Riverside Opportunity Area.</p> <p>We consider that Part A of the policy, which sets a clear quantitative definition for a tall building in Lewisham, in combination with Part C of the policy, which defines height ranges for tall buildings in specific localities aligns with London Plan Policy D9 Part A and is supported.</p>	of the new Local Plan Policy QD 04 Building heights.	
CON038	REP117	Avison Young OBO Artworks Creekside			2	QD 04	<p>However, we note that Part D of the policy prescriptively prohibits any exceedance of the maximums set out in Part D and does not set out any parameters where exceedances could be acceptable. We consider that clear parameters for exceedances are set out to ensure that they have due regard for the emerging context and ensure the most efficient use of land.</p> <p>In our view setting maximum building heights is overly restrictive and could stymie the optimisation of sites through the design led approach, as set out in London Plan Policy D3. London</p> <p>Part D of the draft policy QD4 lists assessment criteria for tall buildings, with D(c) referring to heights being sensitive to the site's immediate and wider context. We consider that this criterion should also refer to the emerging immediate and wider context, given that most areas identified for tall buildings are also subject to emerging site allocations for development and therefore the context will change as these allocations are realised. This will ensure the most efficient use of land in these locations, such as Deptford Creekside.</p> <p>Overall, we consider that the proposed policy wording and supporting text as drafted is not positively prepared or justified, and will place overly restrictive limits on development</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 04 Building Heights.</p> <p>Following consideration, the Council concludes that it disagrees with the content of the representation. The new Local Plan Policy QD 04 Building heights has been positively prepared and is justified. This policy including Figures 5.3 – 5.10 that set out maximum building heights is compliant with the London Plan. Additional parameters setting out exceedances are superfluous and are not necessary to make the Plan sound.</p> <p>For clarity, the London Plan Policy D9 Para 3.9.2 states –</p> <p><i>“Boroughs should determine and identify locations where tall buildings may be an appropriate form of development by undertaking the steps below:</i></p> <ol style="list-style-type: none"> <i>1. based on the areas identified for growth as part of Policy D1 London's form, character and capacity for growth, undertake a sieving exercise by assessing potential visual and cumulative impacts to consider whether there are locations where tall buildings could have a role in contributing to the emerging character and vision for a place</i> <i>2. in these locations, determine the maximum height that could be acceptable</i> <i>3. identify these locations and heights on maps in Development Plans.”</i> <p>The new Local Plan Policy QD 01 Delivering high quality design in Lewisham has been amended to provide clarification that</p>	No further action required in relation to the new Local Plan.

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								development proposals should have regard to existing and emerging context, recognising that the character of sites and areas may evolve over time in accordance with the spatial strategy. Policy QD 04 Building heights includes a cross-reference to QD1, which ensures this will be a consideration determining appropriate building heights.	
CON038	REP118	Avison Young OBO Artworks Creekside			2	QD 06	<i>Draft Policy QD6 – Optimising site capacity</i> As noted above, Policy QD6 must include explicitly emerging contexts as part of the appraisal process in ensuring a design-led approach to be taken to optimise site capacity and establish an appropriate development density. The post-amble of the Policy talks of undertaking a series of appraisal for establishing the optimum site capacity and our planning application engagement with the Council to date has been through this iterative process.	The Council notes the comments made in relation to the new Local Plan Policy QD 06 Optimising site capacity. It is highlighted that Paragraph 13.8 of the new Local Plan clearly states for the site allocations that, “The site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach and having regard to relevant planning policies.” The new Local Plan Policy QD 01 Delivering high quality design in Lewisham has been amended to provide clarification that development proposals should have regard to existing and emerging context, recognising that the character of sites and areas may evolve over time in accordance with the spatial strategy.	No further action required in relation to the new Local Plan.
CON038	REP119	Avison Young OBO Artworks Creekside			2	HE 02	<i>Draft Policy HE2 – Designated heritage assets</i> We previously made representations on the basis that Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990, states that ‘ <i>special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that (conservation) area</i> ’. The 1990 Act and NPPF paragraphs 200-201 also recognise that new development can benefit the character and appearance of a conservation area through enhancements. Given that 2 and 3 Creekside fall within a Conservation Area, it is imperative that draft Policy HE2 is compliant with the NPPF. Part C of Policy HE2 states that ‘ <i>Proposals involving the retention, refurbishment and reinstatement of features that are important to the significance of a Conservation Area will be supported</i> ’. Clearly, not all features can be retained within a	The Council notes the comments made in relation to the new Local Plan Policy HE 02 Designated Heritage Assets. The comments relating to Part C are noted. There is no requirement to repeat guidance from the NPPF. The Local Plan provides a positive framework for preserving the historic environment and the policy seeks to avoid the demolition of buildings that have been identified to make a positive contribution to Conservation Areas.	No further action required in relation to the new Local Plan.

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							<p>redevelopment proposal within a Conservation Area. The post- amble differentiates between ‘original or other features’. The complexities of redevelopment schemes will require the Council to apply this Policy criteria with flexibility based upon the objectively understood importance of any such features.</p> <p>Part E of draft Policy HE2 states that ‘<i>the demolition of buildings or structures that make a positive contribution to the character or appearance of a conservation area will be resisted</i>’. Artworks Creekside continues to disagree with the wording of this criterion as drafted as it fails to accurately reflect how the impact of development proposals on a conservation area should be assessed.</p> <p>Given the Dorothy Bohm v SSCLG (2017)) judgement, it is also necessary to consider the effect of the replacement proposals, as if the contribution made by the replacement is equivalent or better than existing, this would result in no harm or a heritage benefit.</p>		
CON038	REP120	Avison Young OBO Artworks Creekside			2	HE 03	<p>Draft Policy HE3 – Non-designated heritage assets Artworks Creekside note that the assessment criteria contained within draft Policy HE3 goes beyond the test of para. 197 of the NPPF which notes that ‘<i>The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non- designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset</i>’.</p> <p>Instead, the draft Policy HE3 is requiring an assessment which goes above and beyond the requirements of the NPPF.</p> <p>It is noted that Figure 6.2 of the Plan now includes a map showing the areas of non-designated heritage assets which encompasses the Deptford Creekside area.</p>	<p>The comments made in relation to the new Local Plan Policy HE 03 Non-designated heritage assets are noted.</p> <p>The Council considers that the new Plan is in line with NPPF paragraph 190 which states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. There is no need to replicate the tests in paragraph 197 of the NPPF as this will be considered when determining applications.</p>	No further action required in relation to the new Local Plan.
CON038	REP121	Avison Young OBO Artworks Creekside			2	EC 01	<p>Draft Policy EC1 – A thriving and inclusive local economy Artworks Creekside continue to support the Council’s ambitions to support and promote cultural and creative industries in the borough and the creation of the Lewisham North Creative Enterprise Zone (CEZ) covering the Lower Creekside area is strongly supported by Artworks Creekside.</p>	The Council notes and welcomes the supporting comments offered to the new Local Plan Policy EC 01 Location and Design of New Workspace.	No further action required in relation to the new Local Plan.
CON038	REP122	Avison Young OBO			2	EC 02	<p>Draft Policy EC2 – Protecting employment sites and delivering new workspace Policy EC2 seeks to safeguard land for commercial and industrial uses through retaining employment capacity within Strategic Industrial Locations (SIL) and Locally Significant</p>	The Council notes and welcomes Artworks Creekside’s support regarding the changes made to the new Local Plan Policy EC 02 Protecting employment sites and delivering new workspace.	No further action required in relation to the new Local Plan.

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		Artworks Creekside					<p>Industrial Sites (LSIS). We note that Lower Creekside is identified as a LSIS which are identified in Table 8.1 as providing for the borough's 'main local concentrations of commercial and industrial uses, which perform a niche role to support the functioning of the sub-regional and local economy. They provide workspace for micro, small and medium sized businesses, including the cultural, creative and digital industries. Protected for commercial and industrial uses, with priority given to light industrial uses.' We note that this Policy now omits the reference to Policy B1.</p> <p>Part B(a) of draft Policy EC2 has been re-worded and omits the reference to no net loss and instead states that the Council's forecast for net additional floorspace will be met, "Within Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), retaining and wherever possible delivering net gains in industrial capacity, including by intensifying the use of land."</p> <p>We support the Council's approach to retaining and wherever possible delivering net gains in industrial capacity, including the intensifying the use of land in the revised wording of Policy EC2B (a).</p>		
CON038	REP123	Avison Young OBO Artworks Creekside			2	EC 03	<p>Draft Policy EC3 – Location and design of new workspace</p> <p>As demonstrated to the Council through our planning applications, we are seeking to create high quality, flexible and suitable workspaces for micro, small and medium-sized businesses. We therefore support Policy EC3.</p>	The Council notes and welcomes the supporting offered to the new Local Plan Policy EC 03 Location and Design of New Workspace.	No further action required in relation to the new Local Plan.
CON038	REP124	Avison Young OBO Artworks Creekside			2	EC 04	<p>Draft Policy EC4 – Providing suitable business space and affordable workspace</p> <p>Artworks Creekside, having been involved in affordable workspaces on both sites for a number of years, broadly support the principle of the proposed draft Policy wording which seeks major developments to provide at least 10% of new employment floorspace as affordable workspace.</p> <p>Part B of the Policy introduces the requirement that "Development proposals should use the design-led approach to explore options for retaining, repurposing or creating new low-cost workspace that is designed to a high specification and will remain suitable for local businesses, including small businesses and those in the cultural, creative and digital industries".</p> <p>Through the development process of the relevant planning application, Artworks Creekside has sought to retain where possible existing floorspace but has promoted the redevelopment and provision of better quality and more suitable low-cost workspace for local businesses in the cultural, creative and digital industrial in new floorspace.</p>	The Council notes and welcomes the broad support offered to the new Local Plan Policy EC 04 Providing suitable business space and affordable workspace.	No further action required in relation to the new Local Plan.

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CON038	REP125	Avison Young OBO Artworks Creekside			2	EC 06	<p><i>Draft Policy EC6 – Locally Significant Industrial Sites (LSIS) – formerly LEL</i></p> <p>Artworks Creekside note that the principle of no net loss remains within the Policy, and that is now inconsistent with EC2B(a) which removes this wording and replaces with the requirement to retaining and wherever possible delivering net gains in industrial capacity, including by intensifying the use of land. Given that Policy EC2E includes a criteria for circumstances where a net loss of permitted in exceptional circumstances, It is suggested that the Policy should be re-worded in Criteria A:</p> <p>“Development proposals should ensure that there is no net loss retain of industrial capacity within these locations, and seek to deliver net gains wherever possible”</p> <p>Policy EC5 D should be updated accordingly to reflect the requirement of the London Plan to ensure that within LSIS’ intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses. Notwithstanding this, Artworks Creekside support the principle that co-location is allowed within the Creekside LSIS</p> <p>Part E of the draft Policy refers to LSIS has been omitted. Supporting paragraph 8.35 recognises that site allocation policies have been prepared for co-location LSIS sites to ensure that co-location is coordinated and appropriately managed through the masterplan process, particularly to ensure that the function of the LSIS is not eroded by piecemeal development. Artworks Creekside note that the supporting text could go further and note that a master plan approach will not be necessary where sites have already been identified for co-location by virtue of a Site Allocation.</p> <p>Within supporting paragraph 8.36, the draft Local Plan states that schemes which result in a net loss of industrial capacity will only be considered in very exceptional circumstances and goes on to state that ‘<i>proposals will be required to provide a minimum of 50 per cent of genuinely affordable housing on the residential element</i>’. Whilst this position is understood and reflects the London Plan position where there is a loss of industrial capacity, we consider it would be helpful to provide further clarity within the policy wording for proposals that would result in no net loss of industrial capacity schemes would be required to provide a minimum of 35% of genuinely affordable housing on the residential element (to qualify for the Fast Track Route in accordance with London Plan Policies H5 and E7).</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 6 Locally Significant Industrial Sites (LSIS).</p> <p>Consistency between Policy EC 6 A and Policy EC 2 B</p> <p>The specific comment made in relation to the wording of Policy EC6 A and the need for consistency with related wording within Policy EC 2 (at Policy EC 2 B a) is noted. The Council has considered this matter and suggests that the wording at Policy EC 6 A be amended through a modification.</p> <p>Consistency with London Plan Policy</p> <p>The Council notes the comment made in relation to London Plan policy – it is assumed that is in reference to London Plan Policies E4 and E7 (although this is not specified). The Council considers that the existing policy is in general conformity with the London Plan – it is highlighted that this specific issue has not been raised by the GLA as a matter of general conformity. Furthermore, it is noted that as the London Plan forms part of the development plan for Lewisham it is unnecessary for the new Local Plan to slavishly reproduce its content.</p> <p>Master planning</p> <p>The comment and suggestion made in relation to master planning of allocated sites for colocation is noted. For clarity, the new Local Plan Policy DM 3 Masterplans and comprehensive development sets out the requirements for proposals where they – “<i>...form all or part of a site allocation, or in other circumstances specified by the Local Plan.</i>” The Council considers that master planning is key component of the delivery process for securing successful place-making – going beyond the co-ordination and management of colocation uses (within site allocations). For this reason, the</p>	<p>Consistency between Policy EC 6 A and Policy EC 2 B</p> <p>Suggest that the Council consider an amendment to policy wording to ensure consistency between the two policies –</p> <p><i>“Development proposals should ensure that there is no net loss of retain existing industrial capacity within these locations and seek to deliver net gains wherever possible.”</i></p>

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								<p>Council considers the new Local Plan sound.</p> <p>Genuinely Affordable Housing The comments made in relation the reference to securing genuinely affordable housing are noted. For clarity, there remains an acute need for genuinely affordable new homes across the Borough. The Council is seeking to address this through the new Local Plan. The Council considers its approach sound.</p> <p>Furthermore, it is noted that as the London Plan forms part of the development plan for Lewisham it is unnecessary for the new Local Plan to slavishly reproduce its content. It is also noted that the new Local Policy HO 3 Genuinely Affordable Housing provides a sufficiently cross reference to the London Plan. For these reasons, the Council considers the policy sound.</p>	
CON038	REP126	Avison Young OBO Artworks Creekside			2	EC 19	<p>Draft Policy EC19 – Public houses Artworks Creekside has reviewed the draft Policy EC19 and notes that there is a presumption in favour of retention of public houses. The proposals retain the public house and any future planning application will be accompanied by robust evidence on the viability of the current and future pub operation. The Birds Nest PH is a locally listed building – commentary is provided on the associated Policy elsewhere – and the Council’s requirement to ensure that development does not detract from the character and appearance of the building is noted.</p> <p>Policy EC19.C is noted and the requirement to provide an appropriate amount and configuration of floorspace to enable the continued viability of the public house is supported. We welcome that the previous reference to the requirement to ensure the replacement facility is of a comparable character and quality is removed. The replacement wording of EC19.C is supported, and indeed, our proposals for 2 Creekside result in a bigger and better floorspace that includes the required “dedicated performance space or amenity space that has been or can reasonably be used for cultural or community uses”</p> <p>We do continue to object to the post-amble which remains inconsistent with the policy requirements whereby it requires ‘proposals will be required to demonstrate that they have</p>	<p>The Council notes and welcomes Artworks Creekside’s supporting comments regarding the changes made to Part C of the new Local Plan Policy EC 19 Public houses.</p> <p>The Council highlights that Appendix 5 has been amended to provide that flexibility on market requirements may be applied on a case-by-case basis.</p>	No further action required in relation to the new Local Plan.

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							<p><i>considered all reasonable options for retaining the pub in situ</i>. This is not part of the Policy. Only the loss of public house through the change of use or redevelopment has this requirement. The post-amble should be revised accordingly.</p> <p>Artworks Creekside continue to note the commentary about marketing evidence requirement that are expected to be appended to the Local Plan and suggest that this should be applied only where the public house use is being lost, and not where the public house is being re-provided.</p>		
CON038	REP127	Avison Young OBO Artworks Creekside			2	SD2	<p>Draft Policy SD2 - Sustainable Design We support that Part D (and also new Part C) of the Policy now includes the caveat that new non-residential development of 500 sqm or more to achieve a BREEAM 'Excellent' rating is subject to feasibility.</p>	The Council notes and welcomes the supporting offered to the new Local Plan Policy SD2 Sustainable Design and Retrofitting.	No further action required in relation to the new Local Plan.
CON038	REP128	Avison Young OBO Artworks Creekside			2	LNA 01	<p>Comments on Lewisham's North Area Draft North Area Vision and Spatial Objectives The vision for the North Area explains that this area will benefit from continue renewal of older employment sites which will influence the areas evolving character whilst helping to improve its environmental qualities. Deptford Creek to provide a well integrated employment area and mixed-use neighbourhood.</p> <p>In addition the Creative Enterprise Zone (CEZ), and that the Deptford Creekside Cultural Quarter will be grow, and will cement the Borough's position as one of London's leaders in the creative, cultural and digital industries the renewal of industrial sites such as 2 and 3 Creekside.</p> <p>Artworks Creekside have long since supported these principles in their current operations at the two sites and continue to support the Council's ambitions.</p> <p>We note that Lower Creekside (Site Allocation 17) is now labelled as a Locally Significant Industrial Site.</p> <p>Draft Policy LNA1 – North Area place principles Artworks Creekside support Part A of the policy which seeks to facilitate Good Growth, regeneration and intensification and renewal of industrial sites in order to promote cultural and creative industries in accordance with Policy QL1. Part G of the policy is also supported.</p>	The Council notes and welcomes Artworks Creekside support for the North Area Vision, Strategic Objectives and the new Local Plan Policy LNA1.	No further action required in relation to the new Local Plan.
CON038	REP129	Avison Young			2	LNA 03	<p>Draft Policy LNA3 – Creative Enterprise Zone Artwork Creekside support the principles within Policy LNA3 for the designation of a Creative Enterprise Zone. Artworks</p>	The Council notes the comments made in relation to the new Local Plan Policy LNA03 Creative Enterprise Zone.	No further action required in relation to the new Local Plan.

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		OBO Artworks Creekside					Creekside note the approach within Policy LNA3(D). The current approach is unrealistic and is preclusive to redevelopment, and make the following suggestion: <i>“Within the CEZ development proposals involving the loss of Class E(g) office and light industrial and Sui Generis business space that is currently occupied or suitable for use by the creative and cultural industries, including artists workspace, will be strongly resisted. Development proposals involving the loss or change of use of type of workspace will only be permitted where they: a. Ensure that an equivalent amount, or better quality, of Class E(g) workspace is re-provided within the proposal (which is appropriate in terms of type, use and size), subject to viability, market demand and site suitability, incorporating existing businesses where possible; or”</i>	Upon consideration, the Council disagrees with the proposed amended text as it is superfluous and not required to make the Plan sound. Viability, market demand and site suitability considerations are matters that are considered when determining planning applications through the development management process.	
CON038	REP130	Avison Young OBO Artworks Creekside			2	LNA 04	<ul style="list-style-type: none"> Draft Policy LNA4 – Thames Policy Area and Deptford Creekside <p>The relation between 2 Creekside and the Deptford Creekside has been key throughout the development proposals at 2 Creekside and Artwork Creekside appreciate the benefit of a positive relationship with the Creek; however it must not be an explicit requirement to provide public access to the Creek within a development site. We are pleased to see that ensuring accessible public space, ‘where possible’ is maintained.</p> <p>Furthermore, it appears unnecessary to ensure that special regard is paid to the significance of heritage assets and their setting under this Policy. The impact upon designated and non-designated assets are appropriately dealt with under the respective Policies.</p> <p>Artworks Creekside are also satisfied with the updated of the Criteria F which includes support for the existing boating community. The community has been integral to the development proposals at 2 Creekside and has written in support accordingly.</p>	<p>The Council notes and welcomes Artworks Creekside’s support for a positive relationship with the Creek and “where appropriate” incorporating accessible public spaces.</p> <p>The Council disagrees as the maritime and industrial heritage of the area are important features of this riverfront area and it is important that this policy makes reference to these attributes.</p> <p>The Council notes and welcomes Artworks Creekside support for referencing the boating community.</p>	No further action required in relation to the new Local Plan.
CON038	REP131	Avison Young OBO Artworks Creekside				LNA SA 17	<p>Comments on draft Site Allocation 17 (Lower Creekside Locally Significant Industrial Site)</p> <p>The following sections assess the soundness of the draft Site Allocation 17 in accordance with Paragraph 35 of the NPPF which states that a Local Plan should be positively prepared, justified, effective and consistent with national planning policy.</p> <p>Site Allocation (Indicative Development Capacity)</p> <p>Site Allocation 17 comprises a number of development sites along Lower Creekside, including 2 Creekside and 3 Creekside.</p>	<p>The Council notes and welcomes Artworks Creekside’s support for a co-located mixture of complimentary uses and compatible residential uses.</p> <p>The comments relating the Site Allocations Background Paper are noted.</p> <p>The Council considers that it is for the applicant to demonstrate optimum capacity, and this is emphasised in the</p>	No further action required in relation to the new Local Plan.

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							<p>The sites owned by Artworks Creekside and which fall within the Allocation are included in Appendix I.</p> <p>The Council identifies that the whole site allocation comprises 1.1 ha, and has an indicative capacity for 162 residential units and 8,201 sqm of employment floorspace. We note that the site allocation has reduced from the 255 residential units previously identified in the March 2020 draft Local Plan, but slightly more than the previous iteration of 160 residential units.</p> <p>We have previously explained that the Site Allocation Background Paper (January 2021) which underpins the draft Local Plan should not be read prescriptively, and the actual development capacity of a site will need to be established through detailed design. Indicative site capacities are based on either existing planning consents, pre-application stage proposals, masterplan studies or SHLAA density assumptions (taking account of sensitivity assumptions on heritage assets for example). On LSIS co-location sites, a general assumption of 33% employment floorspace and 67% residential uses is suggested. For the Lower Creekside LSIS, this ratio is 33% : 0% : 20% : 47% for employment : main town centre uses : other : residential uses. This has not been reflected in the Allocation.</p> <p>There is a clear inconsistency, and the Council has no methodology for this ratio, nor does it appear to have been tested via any viability method or consider the re-provision of the public house for instance on 2 Creekside. Whilst Artworks Creekside supports the principles of a co-located mixture of employment and residential uses, the indicative development capacity must not preclude viable redevelopment that contribute to a figure in excess of this capacity.</p> <p>Furthermore, Appendix A of the Site Allocation Background Paper outlines that for Lower Creekside LSIS the standard method (SHLAA) plus sensitivity analysis was undertaken to establish the 160 residential unit capacity. We reiterate that without the sensitivity analysis, a site within an Opportunity Area with a PTAL of 4-6 could accommodate up to 355 units (within an Urban location). The Council provides no explanation or methodology on how sensitivity analysis reduces a capacity.</p> <p>We further reiterate that given that the development at 1 Creekside (LBL ref; DC/18/106708) was approved at a density of 350 units per hectare (with a site area of 0.1ha), the</p>	<p>Local Plan. It is highlighted that Paragraph 13.8 states “The site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach and having regard to relevant planning policies”. Within this respect the site allocation does not preclude viable redevelopment that contributes to a figure more than this capacity.</p> <p>The Council considers that the methodology has been applied consistently. 20% of the site was identified as other uses (e.g. river frontage), with the remaining developable floorspace being divided into 33% employment and 47% residential.</p>	

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							indicative development capacity of 162 residential units across the 1.1ha is significantly lower than what could reasonably be delivered through the redevelopment of Lower Creekside taking a design-led approach to site optimisation that reflects the Council's earlier Policies. As such we do not consider this aspect of the allocation has been positively prepared, and it is requested that the indicative development capacity is increased, or it is made clear that the figure provided is in no way a cap on development potential.		
CON038	REP132	Avison Young OBO Artworks Creekside				LNA SA 17	Site Allocation (paragraph 15.98) The site is allocated for comprehensive employment led redevelopment. Co-location of compatible residential and complementary uses are supported by Artworks Creekside within the current drafting. It is requested that ' <i>compatible commercial</i> ' uses are clarified in the Site Allocation.	The Council notes the comments made in relation to the new Local Plan Policy LNA SA 17. Following consideration, the Council disagrees with the proposed change as identifying specific commercial uses could limit the development potential of the site. The Council considers that the current wording provides flexibility.	No further action required in relation to the new Local Plan.
CON038	REP133	Avison Young OBO Artworks Creekside				LNA SA 17	Opportunities (paragraph 15.99) Artworks Creekside support the opportunities provided in updated paragraph 15.89 and support the new reference to the site being located in the Deptford Creek / Greenwich Riverside Opportunity Area.	The Council notes and welcomes Artworks Creekside's support regarding the reference to the Opportunity Area.	No further action required in relation to the new Local Plan.
CON038	REP134	Avison Young OBO Artworks Creekside				LNA SA 17	Development requirements (paragraph 15.10) Artworks Creekside note the continued reference to 'no net loss of industrial capacity' and this should be removed as it no longer accords with the earlier revisions to Policy EC2. The emerging development proposals seek to deliver new active frontages along Creekside which is also supported in this section of the allocation. As with the commentary to draft Policy LNA4, ' <i>the new and improved public realm</i> ' should not necessarily be located adjacent to Creek, whilst waterside access and amenity space should not be an explicit necessity, but as an option that should be tested via a design-led process. The requirement, to provide " <i>a new public path along Deptford Creek linking to Waterlink Way</i> " must not include land within the 2 Creekside development area. This could not be delivered and would prejudice the boaters and be contrary to the objectives of Policy LNA4.	The Council notes the comments made in relation to the new Local Plan Policy LNA SA 17. Following consideration, the Council disagrees with the proposed change. This is because the local evidence suggests that there is a need to retain industrial floorspace on sites that are being redeveloped. Furthermore, the Council considers that public realm should be located adjacent to the Creek to enhance waterfront access, without prejudicing the boating community.	No further action required in relation to the new Local Plan.
CON038	REP135	Avison Young OBO				LNA SA 17	Development guidelines (paragraph 15.91) We agree that non-employment uses, including residential uses, must be sensitively integrated into the development	The Council notes and welcomes Artworks Creekside's support regarding the sensitive integration of non-employment uses and impacts on designated heritage assets.	No further action required in relation to the new Local Plan.

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		Artworks Creekside					<p>through considering operational requirements of future employment uses.</p> <p>Artworks Creekside will consider whether either sites are suitable to accommodate new workspace including artist studios and other SME accommodation, however we seek to retain the rights to prioritise these workspace over other viable employment uses.</p> <p>We understand that development will need to be consider the impacts on designated heritage assets and understand that any new developments should be designed having regard to the character and amenity of the Trinity Laban Centre, the Faircharm site, the buildings opposite the Creek in Greenwich, development at the former Tidemill School and the elevated DLR.</p> <p>The recently commenced development at 1 Creekside (which forms part of the site allocation) must also be considered as part of the emerging character of the area. The development at 1 Creekside establishes a number of design principles which will inform the design approach for other sites within Site Allocation 17, including density, height and massing.</p>	The Site Allocation now recognises that consent has been granted at 1 Creekside. The new Local Plan Policy QD 01 Delivering high quality design in Lewisham has also been amended to provide clarification that development proposals should have regard to existing and emerging context, recognising that the character of sites and areas may evolve over time in accordance with the spatial strategy.	
CON038	REP136	Avison Young OBO Artworks Creekside				LNA SA 17	<p>Summary</p> <p>We are supportive of most of the Plan and much of the allocation, and note than some comments in relation to the employment land, public house and energy policies have been taken into account.</p> <p>Paragraph 35 of the National Planning Policy Framework (NPPF) (2019), confirms the examination tests which will be applied to new Local Plans and spatial development strategies to ensure they have been prepared in accordance with legal and procedural requirements. Plans will be found ‘sound’ if they are positively prepared, justified, effective and consistent with national policy. Paragraph 36 of the NPPF states that the tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.</p> <p>For the reasons set out above, we have concern over the drafting of Policy EC6, in particular the reference to ‘no net loss’ rather than the suggested word. We also set out comments in relation to the Creative Enterprise Zone policy requirements.</p> <p>In detailed respect, Artworks Creekside consider that the proposed indicative site capacity for residential units is significantly lower than what could be reasonable achieved across the Allocation and is unreasonable restrictive. It has not</p>	The Council notes Artworks Creekside’s summary. The Council’s response to the matters raised can be found above.	No further action required in relation to the new Local Plan.

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							<p>been supported by proportionate evidence and having worked with adjacent landowners; the overall residential capacity of Lower Creekside has potential to be higher than proposed in the policy wording. We also make comments on the potential inclusion of a public path on the 2 Creekside development site. For those reasons, the Allocation is not justified.</p> <p>We would therefore suggest that the recommendations set out in these representations should be carefully considered for the plan as a whole to be found sound. We reserve the right to make further comments at the Examination in Public in the event that our requested changes and comments are subsequently taken into account.</p> <p>Next Steps We would welcome the opportunity to be kept informed of progress relating to the document preparation and should you require any further information relating to these representations, then please do not hesitate to contact me.</p>		
CON039	REP137	Boyor Planning OBO Astir Living Limited			3	LCA SA 05	<p>I am writing on behalf of my client, Astir Living Limited, to make representations in relation to the Draft Lewisham Local Plan 'Proposed Submission Document – Regulation 19 Stage' (January 2023).</p> <p>In responding to this consultation, these representations make specific reference to Site Allocation 5 or the Land at Conington Road and Lewisham Road (Tesco), Lewisham, SE13 7PY'. Representations are also made in relation to the following sections:</p> <ul style="list-style-type: none"> • 5. High Quality Design; • 7. Housing; • 8. Economy and Culture; • 11. Sustainable Design and Infrastructure; • 12. Transport and Connectivity; and • 14. Lewisham's Central Areas. <p>Please see attached the following documents which support our client's representations:</p> <ul style="list-style-type: none"> · Completed Forms; <ul style="list-style-type: none"> (i) Application Form – Part A (Personal Details) (ii) Application Forms – Part B (Sections 5, 7, 8, 11, 12 and 14) · Regulation 19 Consultation Representations – Astir Living Limited; and · Site Location Plan. 	<p>The Council notes Astir Living's introductory, overview and contextual comments that relate to the new Local Plan Policy LCA SA 05 Land at Conington Road and Lewisham Road (Tesco).</p> <p>The Council is committed to working with development industry partners to secure the delivery of the new Local Plan in respect of the scale and nature of planned-for of growth set out in its spatial strategy and site allocations. The Council welcomes support for the comprehensive redevelopment of the site comprised of a mixed-use redevelopment with compatible main town centre, commercial and residential uses.</p>	No further action required in relation to the new Local Plan.

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							<p>1. INTRODUCTION</p> <p>1.1 These representations have been prepared by Boyer on behalf of our client, Astir Living Limited ('Astir') in relation to the Draft Lewisham Local Plan 'Proposed Submission Document – Regulation 19 Stage' (January 2023) ('Draft Local Plan').</p> <p>1.2 In responding to this consultation, these representations make specific reference to the Land at Conington Road and Lewisham Road (Tesco), Lewisham, SE13 7PY ('the Site'). The Site is currently under the ownership of Tesco, however, Astir has acquired an interest in this Site and seeks to bring the Site forward, as the developer, in partnership with Tesco, the landowner and retail occupier.</p> <p>1.3 Astir recognise the importance of early engagement as part of the Local Plan process and accordingly, they would have sought to engage at the Regulation 18 Stage "Main Issues and Preferred Approaches". However, as Astir have only recently secured a legal interest in the Site, the Regulation 19 consultation has been the earliest point at which they have been able to engage in the Local Plan process. Nevertheless, as the landowner, Tesco submitted representations to the previous iteration of the Local Plan 'The Main Issues and Preferred Approaches consultation (Regulation 18)'.</p> <p>1.4 The Site is located within the New Cross, Lewisham, and Catford Opportunity Area (OA), as is set out in the London Plan (2021). The Site is also located within Lewisham Town Centre and is allocated within the Lewisham Town Centre Local Plan (2014), under the Conington Road Policy Area, as site S6. This allocation is to be carried forward within the Draft Local Plan, under Site Allocation 5 (SA5), which seeks to ensure that the Site is comprehensively redeveloped to provide a mix of residential, employment and town centre uses.</p> <p>1.5 Astir seek to satisfy the aims of SA5, whilst also optimising the Site to ensure the best use is made this key town centre location. This involves a comprehensive mixed use redevelopment of the Site, to provide a replacement Tesco store, alongside a range of residential uses, that could include build-to-rent (BtR) units, a care home, student housing, purpose built student accommodation (PBSA) and an aparthotel, as well as additional flexible commercial floorspace and new public realm.</p> <p>1.6 These representations set out Astir's response to specific sections within the Draft Local Plan. In particular, they focus on</p>		

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							<p>how the Draft Plan can better facilitate the delivery of a comprehensive mixed use development of the Site, whilst continuing to recognise the London Borough of Lewisham's (LBL) support for its redevelopment.</p> <p>1.7 These representations should be reviewed alongside the most recent pre-application package submitted to LBL on the 29th of March 2023 (Ref – PRE/23/131012).</p> <p>1.8 Responses are provided to the following sections of the Draft Local Plan:</p> <ul style="list-style-type: none"> • 5. High Quality Design; • 7. Housing; • 8. Economy and Culture; • 11. Sustainable Design and Infrastructure; • 12. Transport and Connectivity; • 14. Lewisham's Central Area – Key Spatial Objectives; and • 14. Lewisham's Central Area – Site Allocations. <p>Structure of Statement</p> <p>1.9 This Statement is structured as follows:</p> <ul style="list-style-type: none"> • Section 2 sets out our interest in the Draft Local Plan; • Section 3 sets out our response to the 'Proposed Submission Document – Regulation 19 Stage' consultation document and provides commentary on specific sections and issues; And • Section 4 provides a summary and conclusion. <p>2. OUR INTEREST</p> <p>2.1 This Section describes our clients' interest in the 'Proposed Submission Document –</p> <p>2.2 Astir is an established owner, developer, and manager of living spaces, aspiring to transform the living sectors in the UK. Astir aims to set a new standard for sustainability in residential development, ensuring that places are designed, built, and operated in a highly sustainable manner. Their vision is to create multi-use, mixed tenure communities established through a range of long- and short-term accommodation options for all stages of life. These spaces will be accompanied by commercial, and retail uses to provide doorstep amenity for residents and the wider community.</p> <p>2.3 Astir are bringing forward this application in partnership with Tesco, who will remain on-site as a key employer. As the landowner and supermarket operator, Tesco's requirements are central to the scheme's success. It is critical that the scheme can come forward with the support of Tesco and</p>		

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							<p>without prejudicing their primary business, a highly competitive supermarket business.</p> <p>Tesco</p> <p>2.4 Tesco have very specific requirements in order to operate effectively and efficiently. These are fundamental to unlocking the Site for a comprehensive mixed use development. These representations seek to outline how the Draft Local Plan should better consider the requirements in bringing forward the proposed Site.</p> <p>2.5 In addition to a replacement store, Tesco would need a temporary store in this location to ensure continuity of trade up until a new replacement store is operational.</p> <p>2.6 The Tesco Lewisham Superstore opened in 1987. Approximately 125 people are employed in the store and a number of apprenticeships are provided every year. In addition to the store in Lewisham, Tesco have a superstore in the Catford Shopping Centre and nine express stores. Therefore, Tesco are a major employer in the LB of Lewisham. Since 2016, the Tesco Community Grant programme has provided over £311,000 of funding to 141 local projects in Lewisham. All Tesco stores in the borough also participate in the Community Food Connection programme, which donates surplus food to charities and foodbanks.</p> <p>Land at Conington Road and Lewisham Road (Tesco) <i>Site and Surrounding Context</i></p> <p>2.7 The Site, which measures 1.53ha, currently accommodates a Tesco Superstore and petrol filling station (PFS) which is nearing the end of its useful life. Our client, Astir, have recently acquired an interest in the Site and seek to bring it forward for development with delivery anticipated within the next five years.</p> <p>2.8 The Site is situated on the south side of Conington Road and the west Side of Lewisham Road. The existing buildings are approximately three residential storeys in height. The building is of no architectural merit or interest.</p> <p>2.9 The Site has an open surface car park at its eastern end which provides access to a belowground parking level. Cars exit the basement parking onto an access road of Conington Road which divides the main store from the PFS. This access road also enables access to a surface-level servicing and deliveries bay. Eagle House is located in the south-eastern</p>		

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							<p>section of the Site; it is a non-designated heritage asset that is ancillary to the Main Tesco Superstore.</p> <p>2.10 The Site is bounded to the west by the River Ravensbourne and accompanying footpath (Silk Mills Path) and there is also a sewer running along the edge of and through the Site's western edge.</p> <p>2.11 The Site is highly accessible as its benefits from a PTAL of 6b (highest possible rating). Lewisham mainline and DLR stations are located approximately 300 metres south-west of the site. The Site is also served by various bus stops which are located in close proximity to the site. The Site will also benefit from the proposed extension to the Bakerloo Line from Elephant and Castle to Lewisham and beyond.</p> <p>2.12 The Site is located within the New Cross, Lewisham, and Catford Opportunity Area (OA), as is set out in the London Plan (2021). The Site is also located within Lewisham Town Centre and is allocated within the Lewisham Town Centre Local Plan (2014), under the Conington Road Policy Area, as site S6. This allocation is to be carried forward within the Draft Local Plan, under Site Allocation 5 (SA5), which seeks to ensure that the Site is comprehensively redeveloped to provide a mix of residential, employment and town centre uses.</p> <p>2.13 Under the Draft Local Plan, the Site is considered to be an appropriate location for tall buildings, and forms part of a Regeneration Node. Under SA5, LBL envisage the Site to be delivered within 10 years of the Local Plan being adopted.</p> <p><i>Planning History</i></p> <p>2.14 Astir have engaged in an initial pre-application meeting with LBL on the 23rd of July 2021 (Ref – PRE/21/122226). This meeting focused mainly on the principle of development, site constraints and the capacity of the site to accommodate development. Feedback was also provided on the consequent scale and massing strategy. Formal feedback was issued on the 18th of August 2021. Officers were supportive of the principle of redeveloping the Site, stating that <i>"the proposed mixed-use re-development of the site and the opportunities of enlivening and restoring the river is supported"</i>.</p> <p>2.15 A second pre-application request has since been submitted, on the 29th of March 2023 (Ref - PRE/23/131012). The proposals submitted under this request have evolved in accordance with Officer comments provided as part of the initial meeting and the Site allocation requirements in both the</p>		

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							<p>emerging and adopted local plan's. Similarly, a Level 2 preapplication request was submitted to the Greater London Authority (GLA) on the 14th of April 2023.</p> <p>2.16 The proposals submitted as part of these pre-application requests seek to deliver a comprehensive mixed use redevelopment of the Site, to provide a replacement Tesco store, alongside a range of residential uses. The residential uses include a minimum of 500 buildto-rent (BtR) units, 35 later living units and 60 care bedrooms, purpose built student accommodation (PBSA) and a 380 bedroom aparthotel, as well as additional flexible commercial floorspace and new public realm.</p> <p>2.17 We will of course engage in further pre-application meetings in order to inform the proposals for the Site. Following a period of pre-application and based on evolving discussions, we intend to submit an application towards the end of the year (2023).</p> <p>2.18 We acknowledge that the current development plan allocates the Site for a comprehensive mixed use development, including residential, commercial and town centre uses. We also recognise that care, PBSA and hotel uses are encouraged in town centre location's. Our client wholly supports the continuation of policy support as part of the emerging Local Plan.</p> <p>3. RESPONSE TO 'PROPOSED SUBMISSION DOCUMENT – REGULATION 19 STAGE'</p> <p>3.1 We set out below our response to the relevant sections and issues in the Draft Local Plan consultation document published by the Council.</p> <p>(See cells below)</p> <p>4. SUMMARY AND CONCLUSIONS</p> <p>4.1 As discussed, we wholly support the Council's aspiration to support the comprehensive redevelopment of Site Allocation 5 (SA5) under the Draft Local Plan, to deliver a mix of residential, main town centre and commercial uses.</p> <p>4.2 Astir seek to satisfy and go beyond the aims of SA5, with the aim of optimising the Site to ensure the best use is made this key town centre location. This involves a comprehensive mixed use redevelopment of the Site, to provide a replacement Tesco store, alongside a range of residential uses including build-to-rent (BtR) units, a care home and aparthotel,</p>		

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							<p>PBSA, as well as additional flexible commercial floorspace and new public realm.</p> <p>4.3 We trust that our above comments are of assistance and that LBL will give due consideration to the recommendations we have made.</p> <p>4.4 If you have any questions concerning the above, please do not hesitate to contact us will be happy to help. Otherwise, we trust our comments will be given due consideration and we reserve the right to make further representations with additional evidence in due course.</p>		
CON039	REP138 a and b	Boyor Planning OBO Astir Living Limited				QD 01 QD 06	<p>3. High Quality Design</p> <p>3.2 LBL's overarching aim is to ensure that proposals deliver a high-quality design which contributes to the delivery of inclusive, safe, healthy, liveable, and sustainable neighbourhoods in Lewisham.</p> <p><i>High-Quality Design and Optimising Site Capacity</i></p> <p>3.3 In particular, we are supportive of the Draft Plan's approach to achieving high-quality design through a design-led approach, as is stipulated under Policy QD1 (Delivering High Quality Design in Lewisham). We agree that proposals should give consideration to various designoptions at the early stages of the development process through an understanding of the Site and its local context. Furthermore, we support Policy QD1's acknowledgement that recognition should be given to ensuring the most optimal use of the land, given the need to meet the spatial strategy for the Borough, and in particular housing delivery.</p> <p>3.4 The continued emphasis on adopting a design led approach through Policy QD6 (Optimising Site Capacity) is also supported, particularly as such an approach is key in making the best use of land and optimising the capacity of a site. The policy also recognises that consideration needs to be given to the type and nature of uses.</p> <p>3.5 Accordingly, the design led process for SA5 has given due to consideration to the proposed uses. One of the key uses comprises the Tesco. As part of the proposals, Tesco require its replacement store to have a minimum net sales area of c.2,325 sqm (25,000 sq.ft.) which is to be provided at podium level. Tesco have made clear that this quantum is necessary to support the operation and viability of the store. The proposals seek to satisfy all requirements of Policies QD1 and QD6, as part of the design-led process.</p>	<p>The Council welcomes the support offered in relation to the new Local Plan Policy QD 01 Delivering high quality design in Lewisham and Policy QD 06 Optimising site capacity.</p> <p>The specific support for the new Plan's approach towards securing the optimal use of land, through both policies, is welcomed and encouraged.</p> <p>The stated operational floorspace and format requirements for the current retail operator are noted.</p>	No further action required in relation to the new Local Plan.

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							<p>3.6 We are also supportive of supporting paragraph 5.49 which states that <i>“commercial developments should seek opportunities to intensify uses on employment sites to deliver more jobs”</i>.</p> <p>3.7 Furthermore, we welcome the flexibility allowed for proposals on allocated sites. We note that policy stipulates <i>“where development proposals do not accord with the indicative capacity set out in a site allocation policy, they will only be supported where it is clearly demonstrated that the optimal capacity will be achieved, having regard to Policy QD6”</i>.</p>		
CON039	REP139	Boyor Planning OBO Astir Living Limited				QD 04	<p><i>Tall Buildings</i></p> <p>3.8 Policy QD4 (Building Heights) does not consider the design led approach when considering building heights. Whilst we support part C of the policy, which states tall buildings within Lewisham town centre should be between 16 to 35 storeys, the Site (SA5) is only considered to be appropriate for buildings which are a maximum of 16 storey’s. This is evidenced in figure 5.5 below.</p> <p>3.9 We consider that a maximum limit should not be applied when considering building heights and therefore object to Policy QD4. We recognise that London Plan Policy D9 (Tall Buildings) (2021) stipulates that when determining locations for tall buildings, these should be identified in maps in Development Plans. We also recognise that supporting paragraph 3.9.2 states that in these locations a maximum height could be applied. However, the term <i>‘could’</i> infers that maximum heights should be predicated on an assessment of the existing and prevailing context, as well as, other factors including, but not limited to townscape and impact on views. Instead, Policy QD4 should include a reference to the need to justify buildings heights on a design-led approach, in accordance with London Plan Policy D3 (Optimising Sites through a Design-Led Approach) (2021) and Policy QD6.</p> <p>3.10 Thus far, through our initial pre-application submission’s, we have demonstrated that the Site is able to facilitate a building which is over 28 storeys in accordance with Policy QD4. This has been achieved by developing the proposals through a comprehensive design-led approach which has taken into consideration the existing and emerging local context. The site analysis has identified that the Site presents a significant opportunity to enhance the area, architecturally and in terms of public realm improvements. The emerging proposals are designed to a very high quality, are well-considered and contribute to the legibility of then urban structure, at a point</p>	<p>The comments made in relation to the new Local Plan Policy QD 04 Building Heights are noted. The specific comments made in in relation to the identification and application of maximum heights; and the opinion that certain specific locations are suitable for taller buildings/ higher maximum heights are noted.</p> <p>For clarity, the London Plan Policy D9 Tall Buildings is clear in setting precisely what plan-makers should undertake when preparing new policy. In this respect, London Plan Policy D9 states that local plans should determine the locations where tall buildings are suitable, identify those locations and specify the maximum height that could be acceptable. The respondent’s comment about the London Plan’s use of the word <i>“could”</i> (at London Plan Paragraph 3.9.2) is noted and discounted. The Council suggests that this is an exercise in semantics that has no bearing on soundness.</p> <p>The new Local Plan’s approach towards tall new buildings is consistent and in accordance with the specific requirements set out in to the London Plan. It is justified through a proportionate and comprehensive technical evidence base, and it provides an effective mechanism for decision-taking.</p> <p>The new Local Plan provides development partners and decision-takers the flexibility</p>	No further action required in relation to the new Local Plan.

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							<p>of townscape prominence. The proposals also have the opportunity to complete the emerging Lewisham Town Centre cluster and define its northern edge. The stepping of height through the Site would contribute positively to the existing and emerging skyline.</p> <p>3.11 The proposals have also been supplemented by a Preliminary Townscape Review prepared by Montagu Evans, which confirms that the gaps between the buildings, different height, and taper, combined with the location of the proposals mean that in distant and medium distant views of the skyline, the proposals contribute to a more cohesive profile, with sufficient gaps and differences in height to create a layered effect. The report also confirms that the disposition of surrounding development and landform means there is no real impact on the amenity of settled and traditional residential streets.</p> <p>3.12 However, it has been recognised through the initial pre-application feedback (Ref – PRE/21/122226) that the maximum building height of 16 storey's has been informed by an indicative masterplan developed by EPR for the Conington Road, Meyer Homes (Site Allocation 4 – SA4). This masterplan does not carry any material weight and was only developed as an indicative layout as part of the application for SA4. The layout and height's shown by EPR can only be considered indicative as they were not informed by a technical analysis, such a review of its townscape impact or its impact on daylight and sunlight. Therefore, the indicative masterplan has not been robustly tested and cannot be used to set parameters for SA5.</p> <p>3.13 Moreover, the indicative masterplan prepared by EPR, for the Meyer Homes scheme, did not consider that the owner of the site would seek to remain on site and therefore retain a large Tesco supermarket. The lack of consideration for Tesco's requirements further undermines the validity of the indicative masterplan as a basis for SA5. Tesco's intention to remain on site as a key local employer fundamentally changes the masterplan opportunities, moving proposals away from the indicative masterplan which was based on a permeable network of routes through at-grade courtyards. With Tesco remaining on-site the proposals need to accommodate a large superstore, which is through a podium based development. Whilst this has resulted in additional height, the proposals submitted to date demonstrate that Tesco's operational and spatial requirements can be balanced with the requirements of the Draft Local Plan.</p>	<p>to consider proposals that optimise the development capacity of the site. The application of a master planning approach provides development partners to justify such proposals and decision-takers to consider them on their merits.</p> <p>For these reasons, the Council considers the policy sound.</p>	

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							<p>3.14 Given the Site's 'Major Centre' location, its high accessibility (PTAL – 6b) and proximity to a multi-service transport node, as well as to a number of tall buildings including the under construction Conington Road (up to 35 storeys) and Lewisham Gateway development's, it is indicative that greater optimisation and building heights on the site should be achieved. The exact heights and densities would be dependent on the design led approach to development.</p> <p>3.15 Furthermore, the proposals have been developed in accordance with London Plan Policy D9. This process has demonstrated that the visual, functional, and environmental impacts of a 29 storey building should be considered acceptable. It is also concluded that the Site is considered to be an appropriate location for tall buildings, as is evidenced in the Draft Local Plan. This is also as a result of the Site's location in Lewisham Town Centre, proximity to a number of tall buildings including the under construction Conington Road (up to 35 storeys) and Lewisham Gateway development's, its high PTAL (6b) and its proximity to local services.</p>		
CON039	REP140	Boyor Planning OBO Astir Living Limited				HO 01	<p>7. Housing</p> <p>3.16 LBL's overarching objective is to work positively and proactively with stakeholders to facilitate a significant increase in the delivery of new homes to help meet Lewisham's housing needs.</p> <p><i>Housing Supply & Delivery</i></p> <p>3.17 We support LBL's endeavour to exceed the ten-year London Plan (2021) target of 16,670 (1,667 p.a.) under Policy HO1 (Meeting Lewisham's Housing Need) and its aim of directing housing to town centres and well-connected locations. We also support part C (e) of Policy HO1 which seeks to ensure that proposals make the best use of land and optimise housing sites.</p> <p>3.18 However, we disagree and object to the lack of flexibility that is applied to proposals on allocated sites. This is evidenced under Part C (b), where it states that "<i>a carefully managed uplift in the delivery of housing will be achieved by locating strategic sites for new housing, including mixed-use development, and supporting development proposals where they comply with the site allocation requirements and resisting proposals that are at odds with these</i>". The Draft Plan fails to acknowledge that proposals on allocated sites, should still seek to follow a design-led approach, in turn contradicting part C (e). Whilst we recognise the need to satisfy the development guidelines under site allocations, it should be noted that these</p>	<p>The Council welcomes the specific support offered to elements of the new Local Plan Policy HO 01 Meeting Lewisham's housing needs – particularly in respect of the Council's objective to facilitate a significant increase housing delivery and securing an appropriate of new housing.</p> <p>The comments made in relation to the indicative development capacities identified through the site allocations are noted and discounted. The Council fundamentally disagrees with the opinion that the Plan – it's site allocations and planning policies – is inflexible in its approach to securing optimal development capacities from development proposals.</p> <p>Comments made in relation to the site allocations possible development capacities are noted. Within this context the Council highlights that the new Local Plan must be read and considered in its entirety. The new Local Plan site allocations identify indicative development capacities – the emphasis being upon the word "indicative". The capacity figures</p>	<p>Although Officers are not proposing that any modifications be made in respect of the site allocation specific development capacities, the Council could consider undertaking a separate exercise to identify and assess the possible uplift that higher intensity development could offer. This could inform a parallel decision/ discussion on whether the Council's proposed 5% buffer is sufficient to secure a sound new Local Plan. The possible assessment of site uplift should seek to identify a RAG rate for each site's capacity to accommodate higher density and potentially taller development. The Council could seek to deploy this, if necessary, either in response to Inspector's MIQs or at the hearing sessions.</p>

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							<p>are indicative, and alternative design-led solutions, with increased quantum can be achieved whilst fulfilling the requirements of the allocation.</p> <p>3.19 We propose that Policy HO1 allows for allocated sites to explore capacity for additional homes, through a design-led process. This is relevant within the context of a higher housing target under the Draft Local Plan, as well as poor housing delivery and supply within LBL. These factors place greater importance on promoting housing delivery, exceeding the target of 1,667 homes per annum and removing references under Policy HO1 which supresses housing delivery. Accordingly, these factors are discussed in more detail below.</p> <p>3.20 The Draft Local Plan sets a higher target of 1,667 homes p.a. This figure comprises a 2,825-uplift compared to the previous London Plan (2016) which identified a need of 13,847 dwellings between 2015- 2025 or 1,385 units per annum. With regards to housing delivery, under the most recent Housing Delivery Test results (HDT) (2021), Lewisham scored 87%.As a result, Lewisham would have been required to prepare and deliver an Action Plan which would demonstrate how the Council aims to compensate for the shortfall in housing delivery. HDT results for 2022 are yet to be published by the Government.</p> <p>3.21 However, Lewisham has since provided updated housing delivery figures within their Annual Monitoring Report (AMR) for 2021-2022 (December 2022). Within this document, Lewisham outline that between 2021- 2022, a total of 599 homes were delivered. When considering this figure against an annualised target of 1,667 dwellings under Policy H1 of London Plan (2021), Lewisham achieve a reduced HDT score of 56% for 2022. The consequence of this is that the titled balance at paragraph 11(d) of the NPPF is activated meaning that applications for housing development should be granted unless the adverse impacts of development significantly and demonstrably outweigh the benefits</p> <p>1 9/20 20/21 21/22 19/20 20/21 21/22 1,526 1,110 1,667 4,303 1,284 523 599 2,406 56% Presumption 3.22</p> <p>Furthermore, the AMR recognises that housing delivery has been suppressed in the past 2-3 years and attributes this to the impacts of the Covid-19 Pandemic, the impacts of Brexit on the construction industry and delays in bringing forward larger sites. Paragraph 2.23 states that <i>"Lewisham seems to have</i></p>	<p>identified within the new Local Plan are very much a starting point on a journey to identifying and securing optimal development capacities.</p> <p>In turn, the development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>The Council concludes that the new Local Plan's master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p> <p>The Council notes and welcomes new technical work that may have been undertaken to support the progressive redevelopment of the site. In that respect the Council encourages development partners to constructively engage with the decision-taking process – as outlined above. This provides an opportunity for such evidence to inform the master planning and design-led approaches that will bring forward growth across the Borough.</p> <p>The comments made in relation to the possible future housing land supply trajectory are noted. It is highlighted that</p>	

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							<p><i>been particularly badly affected by Covid-19 with a number of large sites stalling during this period. Viability issues due to the increase in construction costs, delays in the delivery of infrastructure due to a decrease of available funding, a reliance on private development schemes, multiple land ownerships, slower build out of tall buildings, extended Section 106 negotiations, pre-commencement conditions, variations to sites through the submission of Section 73 and Section 96 applications and the impact of Brexit on the construction industry have also combined to markedly suppress the delivery of new homes during 2021-22". Confidence in Lewisham's ability to sustain and increase future housing delivery is also questioned, due to market uncertainties exacerbated by the Cost-of-Living Crisis.</i></p> <p>3.23 The likelihood of continued difficulties in LBL meeting their HDT is further compounded by an increased annualised housing target of 2,212 dwellings per annum for the next five years (2023-2028). This figure is predicated on:</p> <ul style="list-style-type: none"> • The London Plan Housing Target – 1,667 dwellings per annum; • An Appropriate Buffer – at 5%, equivalent to 415 dwellings per annum; and • A Backlog since the Start of the London Plan Monitoring Period – 462 dwellings per annum. <p>3.24 Nevertheless, the AMR estimates an adequate but marginal supply of housing during this period, equating to 11,116 homes between 2023-2028 or a 5.03-year housing land supply. Similarly, supply in the first ten years is also sufficient at 8,645 dwellings. However, as per Chart 5 below, there appears to be a shortfall of 761 dwellings between the 11th and 15th year towards the end of the Local Plan period. The council acknowledge the need to address this shortfall, by stating that it will <i>"need to work with developers and its partners to find an additional supply of longer-term sites to bridge this gap."</i></p> <p>3.25 However, with an increased difficulty in satisfying the HDT in the short-term, this is likely to result in an overall worsening outlook for housing supply, in both the short and long term. With an inevitable presumption in favour of development, this will result in a larger buffer of 20%, in turn, reducing the council's supply down to 4.52 years and placing greater pressure to increase housing supply.</p>	<p>currently Lewisham is meeting the requirements of the Housing Delivery Test and is not facing any of its punitive measures. Nevertheless, the Council is seeking to introduce measures that will seek to provide greater certainty of delivery going forward – to maintain a steady housing land supply.</p> <p>It is further noted that although the Test focusses upon and penalises the local planning authority – in most respects the factors governing delivery are in fact beyond their control. Mooted changes to national planning policy may address this fact. The Council welcomes the introduction of measures that would hold development partners to full account for their performance.</p> <p>Finally, the suggested increase in the % Buffer (as set out under NPPF Para 74) is noted. The Council considers the proposed increase to 20% - as per NPPF Para 74 C – to be excessive, unnecessary, and unjustified.</p> <p>It is an established fact that for such % increases in the buffer to be meaningful in performance improvement, contributing sites and their developers need to be shovel ready; to have an immediate impact. It is telling that this representation does not set out a clear narrative of how an increased quantum of housing, on site, could be delivered in a timely fashion.</p>	

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							<p>3.26 Furthermore, of the 11,116 homes planned in the first five years, 21% are yet to undergo construction and are either only a draft allocation, at pre-application stage, or constitute previously lapsed permissions. With pending economic uncertainty, it can be presumed that many of these sites are likely to face delays pushing delivery into later years and further reducing immediate supply.</p> <p>3.27 Policy HO1 should recognise that proposals (including allocated sites) may be able to achieve a higher quantum of housing, than the indicative figures stipulated within the Draft Local Plan. For example, the proposed Site (SA5), it likely to be able to facilitate a greater quantum than the 407 units identified under SA5. This has been evidenced through a design-led process and seeks to optimise the site. The additional dwellings on SA5 will contribute significantly towards Lewisham achieving its annualised target of 2,212 dwellings per annum for the next five years (2023-2028). As is identified within the AMR, additional supply needs to be secured in order to compensate for a potential increase in housing supply requirements, associated with Lewisham's inability to satisfy its future HDT.</p> <p><i>Unit Mix</i></p> <p>3.28 We support Policy HO1's approach to determining an appropriate housing mix and its aim to provide an appropriate mix of units, between 1 to 3 bedrooms which reflects the local need and town centre location. In particular, we support Part F, which recognises that proposals providing mostly 1 or 2 bedroom units can be considered acceptable. Either if they are located in an area with a PTAL of 3-6 or, where they are only able to provide a mix comprising smaller units due to the site configuration and development constraints.</p>		
CON039	REP141	Boyor Planning OBO Astir Living Limited				HO 05	<p><i>Accommodation for Older People</i></p> <p>3.29 We are supportive of Policy HO5 (Accommodation for Older People) and its aim to direct care accommodation towards town centre locations which are accessible by public transport and provide good access to community facilities. Whilst we recognise that Policy HO5 stipulates a need for 100 units p.a. from 2017 to 2029, this should be a minimum target in order to meet the needs of an ageing population. This is predicated on guidance at a national, regional, and local level, all of which anticipate a greater need for care accommodation in the future.</p> <p>3.30 At a national level, Planning Practice Guidance (PPG) makes clear that the need to provide housing for older people is critical (paragraph: 001 Reference ID: 63-001-20190626).</p>	The Council welcomes the comprehensive support offered in relation to the new Local Plan Policy HO 05 Accommodation for older people.	No further action required in relation to the new Local Plan.

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							<p>The guidance states that where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need (paragraph: 016 Reference ID: 63-016-20190626). The emphasis on planning for care accommodation is further evidenced within the Draft National Planning Policy Framework (December 2022). Paragraph 63 states that when establishing housing need, due consideration should also be given to retirement housing, housing with care and care homes.</p> <p>3.31 At a regional level, paragraph 4.13.1 of the London Plan (2021) recognises that the need will only increase, stating that “by 2029 the number of older person households (aged 65 and over) will have increased by 37 per cent, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42 per cent”. When considering this growing need within the context of a housing crisis, greater importance is placed on increasing the supply of care accommodation to allow older persons the choice to move to specialised accommodation, in turn freeing-up existing housing stock. The need to increase this choice is supported by London Plan Policy GG4.</p> <p>3.32 At a local level, the most recent AMR (2021-22) also highlights that the number of households headed by someone aged 65 or over is expected to increase dramatically by 62% by 2040. Lewisham ageing population is increasing and demonstrates a need to ensure adequate accommodation is planned for in advance.</p>		
CON039	REP142	Boyor Planning OBO Astir Living Limited				EC 11	<p>8. Economy and Culture</p> <p>3.33 LBL’s overarching objective is to enhance the viability and vitality of town centres and to support the local economy.</p> <p><i>Town Centres</i></p> <p>3.34 We are supportive of LBL’s aim to ensure that town centres are more resilient and adaptable to future challenges, as is highlighted under Policy EC11 (Town Centres at the Heart of Our Communities). We welcome Policy EC11’s objective to deliver a mix and balance of residential and main town centre uses in order to attract visitors and ensure people have good access to a competitive range of services and facilities, as well as to support businesses and grow the local economy through provision of a wide range of workspaces and premises.</p>	<p>The Council welcomes the support offered in relation to the new Local Plan Policy EC 11 Town centres at the heart of our communities.</p> <p>The specific support for the objectives to a) ensure that town centres are more resilient and adaptable to future challenges; b) deliver a mix and balance of residential and main town centre uses; and c) support businesses and grow the local economy through provision of a wide range of workspaces and premises, is welcomed.</p>	No further action required in relation to the new Local Plan.
CON039	REP143	Boyor Planning				EC 13	<p>3.35 Similarly, we are supportive of Policy EC13 (Optimising the Use of Town Centre Land and Floorspace) which seeks to reconfigure and optimise existing site’s containing town centre</p>	The Council notes and welcomes the support offered in relation to the new Local Plan Policy EC 13 Optimising the use	No further action required in relation to the new Local Plan.

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		OBO Astir Living Limited					<p>uses, such as supermarket's and other retail uses. Many of these sites are underutilised and comprise buildings of 1-2 storey in height.</p> <p>3.36 We also welcome Part D of Policy EC13 which recognises that development proposals affecting an existing commercial unit must ensure that any ancillary floorspace that is integral to business operations and viability of the unit is not lost or compromised. However, we propose that the scope of Part D is widened to cover all town centre uses, not just commercial.</p> <p>3.37 This is of particular relevance when considering the proposed Site (SA5). The proposed redevelopment of the Site comprises a replacement Tesco store (a minimum of 2,325 sqm net sales area) which will be provided at podium level. Tesco have specific requirements driven by their business model and operational requirements. As mentioned, Tesco's requirements in regard to retaining an operational store at the Site are central to the scheme's success and Tesco must be satisfied with the consented proposals to enable the proposed redevelopment to come forward without prejudicing their highly competitive supermarket retailing business.</p> <p>3.38 Within the context of needing to maintain and enhance the vitality and viability of town centres, it is important that Policy EC13 provides further support for main town centre uses when being provided as part of a mixed use development.</p>	<p>of town centre land and floorspace. The specific support for the objectives to a) reconfigure and optimise existing town centres uses and sites; and b) the retention of ancillary floorspace that is integral to business operations and viability of the use.</p> <p>The stated operational floorspace and format requirements for the current retail operator are noted.</p>	
CON039	REP144	Boyor Planning OBO Astir Living Limited				EC 21	<p><i>Visitor Accommodation</i></p> <p>3.39 We support Policy EC21 (Visitor Accommodation) which promotes hotel uses in highly accessible town centre locations, where there is a good level of public transport accessibility.</p>	The Council welcomes the support offered in relation to the new Local Plan Policy EC 21 Visitor Accommodation.	No further action required in relation to the new Local Plan.
CON039	REP145	Boyor Planning OBO Astir Living Limited				SD 01	<p>11. Sustainable Design and Infrastructure</p> <p>3.40 LBL's objective is to work towards achieving carbon neutrality ahead of 2050 and facilitate action to take a strategic and coordinated approach to the climate change emergency.</p> <p>3.41 We are wholly supportive of LBL's initiative to respond to the climate emergency as part of Policy SD1 (Responding to the Climate Emergency), particularly through initiatives such as:</p> <ul style="list-style-type: none"> • Becoming a net-zero carbon borough; 	<p>The Council welcomes the strong support offered in relation to the new Local Plan Policy SD 01 Responding to the climate emergency.</p> <p>The specific support for the Council's response to the Climate Emergency is highlighted and welcomed. The Council suggests that the respondent review some of their stated objections and suggested amendments considering their stated support for this inter-related matter (see</p>	No further action required in relation to the new Local Plan.

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							<ul style="list-style-type: none"> • Protecting and maximising opportunities to enhance the green network; • Implementing flood risk mitigation measures; • Protecting and enhancing biodiversity; and • Achieving waste self-sufficiency. 	below in relation to car parking and sustainable travel infrastructure).	
CON039	REP146	Boyor Planning OBO Astir Living Limited				TR 04	<p>12. Transport and Connectivity</p> <p>3.42 The overarching objective of this section is to provide a safe, sustainable, and convenient transport network, which will encourage a step change in active travel behaviour.</p> <p>3.43 We are supportive of the Draft Local Plan’s aim to encourage the use of sustainable transport and active travel modes as is outlined under Policies TR1 (Sustainable Transport and Movement). We also, welcome Part A of Policy TR4 (Parking) and its aim to carefully manage the approach to car parking provision, in the interest of reducing reliance on car use.</p> <p>3.44 However, we object to Policy TR4, Part C, which states that development proposal’s should not exceed the maximum car parking standards as set out in the London Plan for retail uses. This position was reflected as part of initial pre-application discussions for the proposed Site (SA5) (Ref – PRE/21/122226) in which officers expressed that the <i>“on-site customer parking is too high and contrary to the London Plan. Officers expect a significant reduction in customer parking provision, appropriate for a town centre with excellent transport connections”</i>.</p> <p>3.45 LBL’s position is contrary to the work undertaken by TPA who are acting on behalf of Astir. TPA have conducted a parking accumulation study, based on Tesco’s minimum requirement for 140 spaces. The study shows that there would only be surplus of 16 spaces. This should therefore justify a level of parking to be re-provided for the new Tesco store, albeit that there will be a significant reduction compared to the current situation, from 285 to 141 (-51%), compared to a much lesser reduction in the store’s net sales area (-74%). In other words, a significant absolute and relative reduction in the car parking is proposed. TPA are engaging in a separate highways pre-application meeting with the LB of Lewisham. Details of their assessments will be enclosed as part of the separate pre-application submission.</p> <p>3.46 Whilst TPA’s work indicates the surplus demand only amounts to 16 vehicles, the proposals will also be supported by a Framework Travel Plan (FTP) which will propose a suite of</p>	<p>The Council notes and welcomes the stated support for the new Local Plan Policy TR 01 Sustainable transport and movement. However, the Council suggests that the stated support is contradicted by other comments made by the respondent – those made in relation to the scale of private vehicle parking and access to sustainable travel network infrastructure (bus stops).</p> <p>The Council notes the comments and objection made in relation to the new Local Plan Policy TR 04 Parking. As stated above, these appear to be at odds with the stated support for the Policies SD 01 and TR 01.</p> <p>For clarity, the London Plan Policy T6 Car Parking clearly states that –</p> <p><i>“Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity... Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’).”</i></p> <p>The London Plan Policy T6 continues by stating that –</p> <p><i>“The maximum car parking standards set out in <u>Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking</u> should be applied to development proposals and used to set local standards within Development Plans.”</i></p>	No further action required in relation to the new Local Plan.

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							<p>measures to encourage uptake in active and sustainable modes of travel.</p> <p>3.47 The approach to retail parking under Policy TR4 should now reflect the change at Part G of London Plan (2021) Policy T6.3 (Retail Parking). This change stems from a policy modification required by the Secretary of State (SoS) and it seeks to enable a less restrictive approach to retail car parking in specified circumstances. London Plan Policy T6.3, Part G states that:</p> <p><i>“G. Boroughs may consider amended standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence that the standards in Table 10.5 would result in:</i></p> <p><i>a. A diversion of demand from town centres to out of town centres, undermining the town centres first approach.</i></p> <p><i>b. A significant reduction in the viability of mixed-use redevelopment proposals in town centre.”</i></p> <p>3.48 Policy TR4 Part C also fails to recognise that whilst the Site is located in a sustainable location, private vehicle’s offer customers convenience when purchasing their ‘weekly shop’. Insufficient car parking would, in turn, limit the number of car-borne customers visiting the store and therefore result in a reduction in footfall and turnover, potentially leading the replacement Tesco store being unviable and fetter the deliverability and redevelopment of the Site. Tesco will not release the Site for redevelopment if there is insufficient car parking to underpin the store’s viability.</p> <p>3.49 In order to facilitate the proposed car parking provision, residential provision has been minimised to (24 spaces) to promote more sustainable forms of transport whilst providing disabled persons’ parking spaces as required.</p>	<p>For further clarity, the London Plan Policy T6.3 states –</p> <p><i>“The maximum parking standards set out in <u>Table 10.5</u> should be applied to new retail development, unless alternative standards have been implemented in a Development Plan through the application of Policy G below. New retail development should avoid being car-dependent and should follow a town centre first approach, as set out in <u>Policy SD7 Town centres: development principles and Development Plan Documents.</u>”</i></p> <p>It is highlighted that the new Local Plan does not identify alternative standards for this location or other town centres. For that reason, the existing policy wording is considered sound.</p> <p>The creation of a site-specific parking study that supports the respondent’s interests is noted. The Council suggests that the new Local Plan provides sufficient flexibility for such technical evidence to be considered and independently assessed through the decision-taking process. It is inappropriate and unreasonable for such detailed evidence to be considered through the plan-making process.</p> <p>Finally, the comment that private vehicle’s offer customer convenience is noted and discounted. The respondent’s claimed support for addressing the climate emergency appears to be in conflict to this statement, which does little to encourage and enable sustainable travel patterns or successful place-shaping.</p>	
CON039	REP147 a and b	Boyor Planning OBO Astir Living Limited				LCA 01 LCA 02	<p>14. Lewisham’s Central Area – Key Spatial Objectives</p> <p>3.50 This section outlines LBL’s vision for Lewisham Town Centre as a key area for regeneration and its role as a ‘Major Centre’.</p> <p>3.51 We support Policies LCA1 (Central Area Place Principles) and LCA2 (Lewisham Major Centre and Surrounds) and their recognition of Lewisham Town Centre being a <i>“Major</i></p>	<p>The Council welcomes the support offered in relation to the new Local Plan Policy LCA 01 Central Area place principles and Policy LCA 02 Lewisham major centre and surrounds.</p>	No further action required in relation to the new Local Plan.

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							<p><i>Centre” and “Regeneration Node”, as is seen at ‘Figure 14.2: Central Area key diagram’ .</i></p> <p>3.52 We also support the ambition of Policy LCA2B (b) to support “<i>Continued investment in Lewisham Major Centre to enable its future designation as a Metropolitan Centre of subregional significance in London is a strategic priority</i>”.</p>		
CON039	REP148	Boyor Planning OBO Astir Living Limited				LCA SA 05	<p>14. Lewisham’s Central Area – Site Allocations</p> <p>3.53 This section outlines key site allocations within Lewisham Town Centre, and the development guidelines that should inform future development on these sites. This includes Site Allocation 5 (SA5) – the Land at Conington Road and Lewisham Road (Tesco), which is addressed below.</p> <p><i>Timescales</i></p> <p>3.54 LBL propose that the Site should come forward within the first 10 years of the Draft Local Plan. Astir consider the proposed delivery timescales to be realistic.</p> <p><i>Indicative Development Capacity</i></p> <p>3.55 We object to the indicative development capacity proposed under SA5. With regards to residential development, the allocation proposes a modest capacity of 407 residential units. We understand that this figure has increased from 380 residential units from the Regulation 18 Stage “Main Issues and Preferred Approaches” Emerging Local Plan. With respect to non-residential uses, a total of 7,604 sqm of main town centre uses and 1,901 sqm of employment uses are expected under SA5. Astir seek to understand how LBL has calculated and/or arrived the proposed quantum of residential and non-residential uses.</p> <p>3.56 Our view is that the proposed indicative quantum for residential and non-residential development, should be regarded as a minimum target. The indicative targets constitute a significant under-delivery for the proposed Site and fail to make the best use of this land. Todate the proposals submitted as part of the pre-application process to LBL have been predicated on a design-led approach in accordance with London Plan Policies D3 and D9. In accordance with these policies, we have sought to optimise the Site to deliver an appropriate scale of development with appropriate massing which is able to exceed the range of uses and quantum identified under SA5. Through the design-led approach, the Site’s capacity has been optimised and could facilitate the following uses:</p>	<p>The Council welcomes the implied broad level of support for the new Local Plan Policy LCA SA 05 Land at Conington Road and Lewisham Road (Tesco).</p> <p>The Council notes and welcomes the comments made in respect of the proposed delivery trajectory. The respondent’s statement that it is realistic is highlighted.</p> <p>The respondent’s objection to the identification and use of indicative development capacities for the site allocation is noted and discounted.</p> <p>The comments made in relation to the indicative development capacities identified through the site allocations are noted and discounted. The Council fundamentally disagrees with the opinion that the Plan – it’s site allocations and planning policies – is inflexible in its approach to securing optimal development capacities from development proposals.</p> <p>Comments made in relation to the site allocations possible development capacities are noted. Within this context the Council highlights that the new Local Plan must be read and considered in its entirety. The new Local Plan site allocations identify indicative development capacities – the emphasis being upon the word “indicative”. The capacity figures identified within the new Local Plan are very much a starting point on a journey to identifying and securing optimal development capacities.</p>	<p>Suggest that the Council note the respondent’s comments on the proposed delivery timescale and cite their agreement that the redevelopment of the site allocation will be in accordance with the anticipated trajectory.</p> <p>Although Officers are not proposing that any modifications be made in respect of the site allocation specific development capacities, the Council could consider undertaking a separate exercise to identify and assess the possible uplift that higher intensity development could offer. This could inform a parallel decision/ discussion on whether the Council’s proposed 5% buffer is sufficient to secure a sound new Local Plan. The possible assessment of site uplift should seek to identify a RAG rate for each site’s capacity to accommodate higher density and potentially taller development. The Council could seek to deploy this, if necessary, either in response to Inspector’s MIQs or at the hearing sessions.</p>

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							<ul style="list-style-type: none"> • A Tesco Supermarket with a minimum net sales area of 2,325 sqm (Class E); • A minimum of 500 BtR units (Class C3); • A Care Home with a minimum of 35 later living units and 60 care beds (Class C2); • An Aparthotel with a minimum of 380 rooms (Class C1); • PBSA; and • Flexible Commercial and Retail Floorspace (Class E). <p>3.57 As is previously mentioned, Tesco seek to remain on Site, however for this to be financially viable, Tesco have stipulated that they require a podium level store which comprises a minimum net sales area of 2,325 sqm. This quantum meets Tesco's operational requirements and reduces risk to a degree at which it is feasible to redevelop the store without suffering a financial loss. This is a fundamental requirement in unlocking this Site for comprehensive redevelopment and retaining employment in the Borough.</p> <p>3.58 The proposed delivery BtR units seeks to go beyond the indicative capacity of 407 residential units. As is outlined in Section 7 of this Statement, these additional dwellings will provide a valuable contribution towards Lewisham's increased housing target of 2,212 dwellings p.a. over the next five years (2023-2028). We, therefore, encourage that the uplift in residential floorspace is reconsidered and increased, having regard to the location and site-specific considerations. LBL's 'standard method' for an Opportunity Area site with central setting and a PTAL of 5-6b, indicates a minimum capacity of (1.53 ha x 450 dwellings/ha) 689 homes.</p> <p>3.59 The AMR recognises that housing delivery has been suppressed in the past 2-3 years and attributes this to the impacts of the Covid-19 Pandemic, the impacts of Brexit on the construction industry and delays in bringing forward larger sites. Confidence in Lewisham's ability to sustain and increase future housing delivery is also questioned, due to market uncertainties exacerbated by the Cost-of-Living Crisis. This level of poor delivery translates to a HDT measurement of 56% when considering housing delivery figures published within the AMR against the new London Plan (2021) targets.</p> <p>3.60 With an increased difficulty in satisfying the HDT in the short-term, this is likely to result in an overall worsening outlook for housing supply, in both the short and long term. With an inevitable presumption in favour of development, this will result in a larger buffer of 20%, in turn, reducing the council's supply down to 4.52 years and placing greater pressure to increase housing supply.</p>	<p>In turn, the development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>The Council concludes that the new Local Plan's master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p> <p>The Council notes and welcomes new technical work that may have been undertaken to support the progressive redevelopment of the site. In that respect the Council encourages development partners to constructively engage with the decision-taking process – as outlined above. This provides an opportunity for such evidence to inform the master planning and design-led approaches that will bring forward growth across the Borough.</p> <p>The comments made in relation to the possible future housing land supply trajectory are noted. It is highlighted that currently Lewisham is meeting the requirements of the Housing Delivery Test and is not facing any of its punitive measures. Nevertheless, the Council is seeking to introduce measures that will</p>	

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							<p>3.61 The poor housing context within LBL places greater importance on the need to re-examine the quantum of housing proposed under SA5, especially as the Site is suitable, deliverable, and sustainable. This is evidenced through the Site's allocation under the Draft Local Plan, as well as Astir endeavour to bring the Site forwards without delays. Furthermore, the worsening economic context, which is recognised within the AMR, gives greater impetus to focus on optimising site's where there is a high degree of certainty that they will come forward, such as SA5.</p> <p>3.62 With regards to the Aparthotel and Care Home, these uses are supported by the Draft Local Plan, particularly Policies HO5 and EC21.</p> <p>3.63 Policy HO5 supports the delivery of older persons accommodation on the proposed Site, given it offers a sustainable and accessible town centre location and close proximity to public transport links and community facilities.</p> <p>3.64 Policy EC21 also supports the delivery of Hotels in town centre locations. The hotel will seek to provide both short and longer stay options, with shorter stays being taken by leisure guests, whilst the longer term options being suitable for corporate guests. The Site's easy access to Greenwich along with the corporate hub Canary Wharf and the City of London make it an ideal location for a short- and long-term hotel for leisure and corporate guests. These benefits associated with the site's proximity to Central London and Canary Wharf is also recognised within paragraph 6.17 of the Town Centre Local Plan. It states that <i>"Lewisham town centre is within 20 minutes travel of central London and Canary Wharf generating a significant opportunity for hotel development. The Council consider hotels as a suitable town centre use in principle and are, in general, supportive of the idea of the generation of a hotel cluster."</i></p> <p>3.65 In addition to the uses above, the proposal will deliver flexible commercial floorspace (Class E) which will include retail and/or office space.</p> <p>3.66 We therefore propose that the uses and associated quantum identified within SA5 are reconsidered recognising our client's design-led approach and the strategic objectives of the Draft Local Plan. The proposed mix of uses seeks to improve the viability and vitality of the town centre, evidenced through its aim to diversify the town centre uses on offer.</p>	<p>seek to provide greater certainty of delivery going forward – to maintain a steady housing land supply.</p> <p>It is further noted that although the Test focusses upon and penalises the local planning authority – in most respects the factors governing delivery are in fact beyond their control. Mooted changes to national planning policy may address this fact. The Council welcomes the introduction of measures that would hold development partners to full account for their performance.</p> <p>Finally, the suggested increase in the % Buffer (as set out under NPPF Para 74) is noted. The Council considers the proposed increase to 20% - as per NPPF Para 74 C – to be excessive, unnecessary, and unjustified.</p> <p>It is an established fact that for such % increases in the buffer to be meaningful in performance improvement, contributing sites and their developers need to be shovel ready; to have an immediate impact. It is telling that this representation does not set out a clear narrative of how an increased quantum of housing, on site, could be delivered in a timely fashion.</p> <p>The Council notes that the current retail operator, who occupies part of the site allocation, desire to remain as part of the comprehensive redevelopment. The Council encourages development partners to work positively in terms of plan-making and subsequent decision-taking. Nevertheless, it would be entirely unsound for the new Local Plan to set out policy that facilitated development for a specific commercial operator – not least because an approach is at high risk of being out-of-date. For that reason, the site allocation, which seeks comprehensive mixed-use redevelopment with compatible main town centre, commercial and residential</p>	

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							<p>Further consideration should be given to Paragraph 31 of the NPPF (2021) which states that all policies should be underpinned by up-to-date evidence and should take into account relevant market signals.</p> <p><i>Site Allocation & Opportunities</i> 3.67 As is outlined in paragraph's SA5's 3.55 to 3.66 of this Statement, we support SA5's aspiration for the comprehensive re-development of the Site to provide compatible main town centre uses, commercial and residential uses, an improved public realm, new public open space and improved walking and cycle routes.</p> <p>3.68 However, we would encourage that the following additions (underlined) are added to the description of the site allocation under paragraph 14.42:</p> <p><i>"Comprehensive mixed-use redevelopment with replacement large retail store, compatible main town centre, commercial and residential uses. Public realm, access and environmental enhancements including new public open space, appropriate car and cycle parking, improved walking, and cycle routes and along the river".</i></p> <p><i>Development Requirements</i> 3.69 We support the development requirements seeking to improve connectivity, maximise active frontages, provide a high-quality public realm and deliver enhancement works to the River Ravensbourne.</p>	uses – does not specific possible development partners. Should the current retail operator determine that participation in the redevelopment of the site allocation is not for them – this allows other willing parties to become involved.	
CON039	REP149	Boyor Planning OBO Astir Living Limited				LCA SA 05 Para 14.45 1	<p>• <i>DG1 - Development should provide for a complementary mix of uses which support but do not detract from the vitality and viability of Lewisham town centre, particularly the Primary Shopping Area.</i></p> <p>3.70 We support the DG1 which seeks to provide a complementary mix of uses which support the viability and viability of Lewisham Town Centre. This is evidenced through the delivery of a comprehensive mixed-use development that could deliver BtR units, a Tesco Supermarket (11,272 sqm), an Aparthotel, a care home, potential PBSA, as well as flexible retail and commercial floorspace.</p>	The Council welcomes the support offered in relation to the new Local Plan Policy LCA SA 05 Land at Conington Road and Lewisham Road (Tesco) Development Guidance Paragraph 14.45 1. The support for the proposed comprehensive mixed-use development for the site allocation is welcomed and encouraged.	No further action required in relation to the new Local Plan.
CON039	REP150	Boyor Planning OBO Astir Living Limited				LCA SA 05 Para 14.45 2	<p>• <i>DG2 - The site should function as a transitional site, both in terms of land use and visual amenity, from the surrounding low-rise residential neighbourhoods into the transport interchange, Lewisham Gateway, and the heart of the town centre. The design of development must step down and respond positively to the residential properties at the site's eastern side, at Conington Road and beyond.</i></p>	The Council notes the comments made in relation to the new Local Plan Policy LCA SA 05 Land at Conington Road and Lewisham Road (Tesco) Development Guidance Paragraph 14.45 2.	No further action required in relation to the new Local Plan.

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							<p>3.71 We object to the requirement for the Site to be functioning as a ‘transitional site’. The term is at odds with London Plan Policy D3 and Draft Local Plan Policy QD6, which seek to optimise site’s through a design-led process. The term fails to recognise that the design-led process would capture and manage impacts on heritage, townscape and the current and emerging context whilst optimising the Site to deliver much needed uses such as housing, town centre uses and other commercial uses. The term ‘transitional’ should not be listed as a requirement, instead it should be acknowledged that the design-led process will result in overall massing and form which is transitional.</p> <p>3.72 The proposals submitted as part of the second pre-application enquiry (Ref – PRE/23/131012) demonstrate this. The proposals comprise an appropriate massing with a range of heights, which are balanced against the need to optimise the quantum of housing, the supermarket, hotel, care home and ground floor commercial and retail uses. The proposed massing has been informed by a technical analysis and has been considered appropriate through a Preliminary Townscape Assessment prepared by Montagu Evans.</p> <p>3.73 All in all, the proposals are well-integrated and respond positively to the properties along Conington Road and Lewisham Road; the River Ravensbourne; the town centre; the Silk Mills Path Area of Special Local Character and properties to the north. This is achieved through the proposed massing and the through numerous public realm improvements.</p>	<p>The specific comments made in relation to the description of the site allocation as a transitional site are noted and discounted. The use of the word "transitional" is technically and factually correct within this context. The site is within a transitional location in terms of townscape visual character and appearance, and its function.</p> <p>Contrary to what is implied within the representation, the site is located outside of Lewisham Town Centre’s main built form – to the north of the Lewisham Road Railway Bridge. Within this part of Lewisham, the townscape noticeably changes, or transitions away from the taller intense developments located south of the Railway Bridge, to more human scale high street retail that rapidly transitions into residential. These are characterised by lower vertical intensity forms – typically of two, three and four residential-story height. The overall townscape rapidly becomes suburban residential. For these reasons, the Council concludes that the definition, as a transitional area, is factually correct.</p>	
CON039	REP151	Boyor Planning OBO Astir Living Limited				LCA SA 05 Para 14.45 3	<p>• <i>DG3 - Development should ensure buildings are set back sufficiently to be able to provide high quality urban spaces with generous, functional, and formal landscaped areas forming the central part of an improved Silk Mills Path and the river corridor. Dissecting Silk Mills Path should be access from Lewisham Road and Conington Road, linking to the river and Lewisham interchange.</i></p> <p>3.74 We propose that DG3 gives greater consideration to the re-provision of the Tesco supermarket, which will be located at podium level. The scale and massing of this element has been designed to be sufficiently set back to enable the provision of a high-quality public realm. The proposed character areas seek to provide an identity and function to a collection of high-quality urban spaces positioned to amplify Eagle House and the river walk along the renaturalised river. New routes are proposed, providing pedestrian access between Lewisham and Conington Road, as well as between</p>	<p>The Council welcomes the support offered in relation to the new Local Plan Policy LCA SA 05 Land at Conington Road and Lewisham Road (Tesco) Development Guidance Paragraph 14.45 3.</p> <p>The suggestion that Paragraph 14.45 3 be amended to “give greater consideration to the re-provision of the Tesco supermarket, (which will be located at podium level)” is noted and discounted. The policy already acknowledges that the comprehensive redevelopment of the site allocation will deliver a “complementary mix of uses which support but do not detract from the vitality and viability of Lewisham town centre, particularly the Primary Shopping Area” – inclusive of main town centre uses</p>	No further action required in relation to the new Local Plan.

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							Silk Mills Path and Lewisham Station via the existing access points as well as the new access across the Meyer Homes Site.	(retail). It is entirely inappropriate for the policy to require the “reprovision” of a specific named retail operator – such an approach would be ineffective and could become out-of-date over the life of the plan. Furthermore, the master planning and design-led approaches that will applied to this site provide appropriate and effective mechanisms to considers possible design matters, including the use of a podium format, through the decision-taking process. For these reasons, the Council considers the existing wording sound.	
CON039	REP152	Boyor Planning OBO Astir Living Limited				LCA SA 05 Para 14.45 4 & 5	<ul style="list-style-type: none"> • <i>DG4 - Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk.</i> • <i>DG5 - Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into the trunk sewer running south to north through the site will not be allowed.</i> <p>3.75 We welcome the requirement to work in partnership with the Environment Agency and Thames Water. Astir seek to engage in separate pre-application discussions to identify ways in which to mitigate against flood risk along the River Ravensbourne and to manage the impacts on ground water, surface water and ensure adequate infrastructure is provided to facilitate this.</p>	The Council welcomes the support offered in relation to the new Local Plan Policy LCA SA 05 Land at Conington Road and Lewisham Road (Tesco) Development Guidance Paragraph 14.45 4 & 5. The support for partnership working with relevant infrastructure providers is welcomed and encouraged.	No further action required in relation to the new Local Plan.
CON039	REP153	Boyor Planning OBO Astir Living Limited				LCA SA 05 Para 14.45 6	<ul style="list-style-type: none"> • <i>DG6 - Development should respond positively in scale, bulk, and massing to the River Ravensbourne, taking advantage of the natural slope of the site. The river embankment should be visually and physically accessible from Conington Road and improve access to Lewisham transport interchange, Lewisham Gateway, and the wider town centre environment.</i> <p>3.76 We support the requirement to positively respond to the River Ravensbourne. The proposed scale, bulk and massing has been carefully considered in relation to the river, as per the most recent pre-application submission.</p> <p>However, we propose that DG6 recognises the need to re-provide a large-format Tesco store adjacent to the river which</p>	<p>The Council welcomes the support offered in relation to the new Local Plan Policy LCA SA 05 Land at Conington Road and Lewisham Road (Tesco) Development Guidance Paragraph 14.45 6.</p> <p>The suggestion that Paragraph 14.45 6 be amended to “recognise the need to re-provide a large-format Tesco store adjacent to the river” is noted and discounted. The policy already acknowledges that the comprehensive redevelopment of the site allocation will</p>	No further action required in relation to the new Local Plan.

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							requires a certain amount of development and mass. This area will benefit from comprehensive naturalisation and public realm improvements. The river will be accessible via the Town Centre, Lewisham Transport Interchange and Conington Road, via the north-south route in Silk Mills Path and an east-west route from Silk Mills Path to Eagle House.	<p>deliver a “complementary mix of uses which support but do not detract from the vitality and viability of Lewisham town centre, particularly the Primary Shopping Area” – inclusive of main town centre uses (retail). It is entirely inappropriate for the policy to require the “reprovision” of a specific named retail operator – such an approach would be ineffective and could become out-of-date over the life of the plan.</p> <p>Furthermore, the master planning and design-led approaches that will applied to this site provide appropriate and effective mechanisms to considers possible matters such as scale, bulk, and mass through the decision-taking process. For these reasons, the Council considers the existing wording sound.</p>	
CON039	REP154	Boyor Planning OBO Astir Living Limited				LCA SA 05 Para 14.45 7	<p>• <i>DG7 - Development should respond positively to the scale and grain of the existing historic fabric towards the southern end of the site, at Silk Mills Path and Lewisham Road.</i></p> <p>3.77 We welcome the need to respond positively to the southern area of the Site at Silk Mills Path and Lewisham Road. Careful consideration has been given to the historic fabric towards the south of the site. Here the massing and scale of the development is proposed to step down sensitively, and the existing route along Silk Mills Path is enhanced.</p>	The Council welcomes the support offered in relation to the new Local Plan Policy LCA SA 05 Land at Conington Road and Lewisham Road (Tesco) Development Guidance Paragraph 14.45 7.	No further action required in relation to the new Local Plan.
CON039	REP155	Boyor Planning OBO Astir Living Limited				LCA SA 05 Para 14.45 8	<p>• <i>DG8 - Development should respond positively to Eagle House, which sits on the site’s eastern edge fronting Lewisham Road. This building was constructed in approximately 1870 and is one of the original Anchor Brewery Buildings. It is of architectural and local significance.</i></p> <p>3.78 We acknowledge the local heritage and architectural significance of Eagle House. Recognising this, we seek to celebrate its local significance by transforming this building into a modern flexible working and community use to act as a beacon drawing people into the site. Located at the south-eastern corner of the Site, Eagle House will present itself as a local landmark.</p>	The Council welcomes the support offered in relation to the new Local Plan Policy LCA SA 05 Land at Conington Road and Lewisham Road (Tesco) Development Guidance Paragraph 14.45 8. The stated support for the preservation and enhancement of the local heritage assets as a component part of growth is welcomed and encouraged.	No further action required in relation to the new Local Plan.
CON039	REP156	Boyor Planning OBO				LCA SA05 Para 14.45 9	<p>• <i>DG9 - Development should allow for the retention and/ or re-provision of the bus stop and stand facility that are currently provided on this site.</i></p>	The Council notes the comments made in relation to the content of new Local Plan Policy LCA SA 05 Paragraph 14.45 9 – specifically in relation to the retention of public transport connectivity (a bus stop)	No further action required in relation to the new Local Plan.

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		Astir Living Limited					<p>3.79 We object to the retention of a bus stop on-site, as this would materially impact the Site's ability to deliver the public benefits put forward as part of future proposals. These benefits include but are not limited to the provision of housing, flexible retail and commercial floorspace, leisure uses, care accommodation, PBSA, as well as improvements to the public realm and river.</p> <p>3.80 The existing bus route (273) only serves one route and is an extension of the original route from Petts Wood to Lewisham Station. The bus stops on site then immediately returns back to Lewisham Station. Therefore, whilst the bus route provides a trading benefit to Tesco, the benefit to the wider community is limited. It should be noted that there are multiple bus services available on Lewisham Road, along the eastern boundary and Station Road, south of Silk Mills Path. These bus stops serve a total of seven bus routes, including the 47, 129, 199, 225, 380, N89 and N199.</p>	<p>on-site. The suggestion that this requirement be removed is discounted on the grounds that this will harm the accessibility onto the site and result in unsuccessful place-making.</p> <p>The Council expresses its surprise that the respondent states that the retention of a bus stop on-site would materially impact the Site's ability to deliver the public benefits. This statement is counterintuitive as public transport connectivity is itself a "public benefit". It is highlighted that securing good, improved access to public and sustainable transport infrastructure networks is a key strategic objective.</p> <p>The comment that the specific bus stop currently only serves one route is noted. However, this may not always be the case – particularly as travel habits shift from being reliant upon private vehicles to more sustainable modes; a shift that is anticipated during the life of the plan.</p>	
CON040	REP157	Avison Young OBO Barratt London			3	LSA SA 01	<p>Representation to the London Borough of Lewisham's Consultation on the 'Draft Regulation 19 Local Plan' (Dated January 2023) Barratt London We write on behalf of Barratt London (BL) in representation to the London Borough of Lewisham's (LBL) current consultation on the Draft Regulation 19 Local Plan (January 2023). This document is of interest to BL given its landholding at 'Bell Green Works' (the Former Bell Green Gasholders), London (the Site). For clarity, the location of the Site is shown within Appendix I of this Representation.</p> <p>We understand that LBL seeks to publish a new Local Plan which will set out a shared vision for the future of the Borough along with the planning and investment framework to deliver this vision to 2040. Once finalised the Local Plan will comprise an adopted document within Lewisham's statutory Development Plan and will replace the current Lewisham Core Strategy (2011), Site Allocations Local Plan (2013) and Development Management Local Plan (2014).</p> <p>Overall, BL broadly supports the principle of the emerging Local Plan to help establish a future vision for Lewisham.</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan in general and specifically Policy LSA SA 01 Former Bell Green Gas Holders and Livesey Memorial Hall. The Council remains committed to working with its development industry partners to secure growth and good quality place-making in accordance with the new Local Plan.</p> <p>The Council welcomes the timely delivery of the site allocation; the proposed restoration of the Livesey Memorial Hall and its associated bowling green; reinstatement of community uses; implementation of new infrastructure networks including pedestrian and cycle routes, and open space; and the delivery of new residential accommodation.</p> <p>Scale of development – capacity and yield The comments made in relation to these matters are noted. The Council considers</p>	The Council will contact the site allocation promoter with the objective of securing a signed SoCG that identifies matters of agreement between the parties and a delivery trajectory.

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							<p>However, we do make various comments below concerning how its policies (especially those relating to the Site) should be addressed within this document.</p> <p>Context of Representation The Site is currently the subject of a live planning application (Ref: DC/23/129814), submitted to LBL in December 2023. As such, LBL's emerging Local Plan comprises a key material consideration in the determination of this application – as the document will importantly gain weight in planning decision-making concerning the Site as preparation of the emerging Local Plan progresses. Former Bell Green Gas Holders and Livesey Memorial Site Allocation (Site Specific Policy) Within the draft Regulation 19 Local Plan the Site, together with the adjacent Livesey Hall and its curtilage, forms part of the Draft Site Allocation 1 ('Former Bell Green Gas Holders and Livesey Memorial Hall').</p> <p>Given that the Site comprises an important strategic development and regeneration opportunity within the Bell Green area, the Draft Site Allocation is hugely relevant to the BL's future development aspirations at this stage. For clarity, the current Draft Site Allocation 1 boundary is set out within Figure 1 below:</p> <p>Site Allocation 1 Former Bell Green Gas Holders and Livesey Memorial Hall Overall, we strongly support the inclusion of the Former Bell Green Gas Holders and Livesey Memorial Site Allocation within the draft Local Plan given that it seeks to ensure the comprehensive, residential-led redevelopment of this important brownfield and vacant site within the Borough.</p> <p>We have the following more detailed comments:</p> <p>Development Capacity The current Draft Site Allocation sets out illustrative criteria associated with its future comprehensive mixed-use redevelopment, identifying indicative capacity for 100-442 net residential units, 465sqm employment space and 1,859sqm main town centre use. We broadly support the inclusion of these thresholds, providing that these remain illustrative (and allow for the opportunity to optimise development capacity beyond these thresholds if justified in design and planning terms).</p> <p>In addition, we consider that the Draft Site Allocation should allow for lower provision of non-residential floorspace to be</p>	<p>its approach towards indicative on-site development capacities, and the associated requirement to optimise yields is considered sound. The master planning approach advocated for this site allocation provides development an opportunity to explore innovative approaches that meet these objectives. These approaches are sufficiently flexible to inform development proposals through evidence. Again, the Council considers this to be sound.</p> <p>Suitability for Tall New Buildings The new Local Plan addresses this matter through Policy QD 04 Building Height. The Council maintains that the policy approach to this matter is sound – being justified and effective. Although the respondent has referred to the gas holder structures that were historically present on this site, the council maintains that these do not establish a pattern for tall new buildings. The Council maintains that future new development on this site allocation must be guided by Policy QD 04 and the associated Tall Building Suitability at Figure 5.1.</p> <p>The Council reiterates that the master planning and design-led approach applied to the site allocations provide development partners with the opportunity to explore opportunities for innovation. These could provide flexibility in design in respect of massing, bulk, height, and siting – subject to them clearly demonstrating the high quality of what is being proposed. Securing quality design and place is a fundamental requirement of sustainable development.</p>	

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							<p>delivered at the Site providing that this is justified via market/commercial demand evidence.</p> <p>In short, the Draft Site Allocation should allow for flexibility, to ensure that future development at the Site is ultimately deliverable on this suitable, available and achievable brownfield site. Relationship with Livesey Hall</p> <p>The Draft Site Allocation requires development to be sensitive to the setting of the listed Livesey Memorial Hall and its curtilage (included its surrounding open spaces and on-site structures), along with the listed boundary wall and War Memorial.</p> <p>We broadly support the principle of ensuring that new development within the Draft Site Allocation is respectful of the Livesey Memorial Hall's character and setting (in heritage terms). However, this should not preclude the delivery of residential-led development there, nor the delivery of much needed new homes, providing that key planning, design and heritage matters are addressed through a comprehensive design process.</p> <p>Comprehensive Masterplanned Approach We broadly support the aspiration for the Draft Site Allocation to be comprehensively masterplanned. Given the multiple land ownerships within the allocation boundary, we consider that this can be suitably achieved through ensuring that 'neighbourly design principles' are incorporated into each respective scheme. We recommend that wording clarifying these matters be added in to the allocation wording. This approach will help to ensure that delivery of development on the part of the Draft Site Allocation (owned by BL) is not slowed down by a lack of progress on other parts of the Site. Development on each part of the Site should be designed to not prejudice development coming forward on adjacent land parcels within the allocation.</p> <p>Building Heights The development guidelines within the Draft Site Allocation advise that tall buildings will not be appropriate in the western portion of the site. However, part of the Draft Site Allocation (within the south-east) is included within an identified 'Tall Building Suitability Zone'. We broadly support the Council's approach towards identifying tall building locations within the Draft Site Allocation.</p>		

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							However, the Policy should be worded more flexibly (to potentially allow taller elements to come forward on other parts of the Site, providing that proposals are justified via design, planning, townscape/visual and heritage evidence).		
CON040	REP158	Avison Young OBO Barratt London			3	LSA 03	<p>Policy LSA3 – Bell Green and Lower Sydenham Draft Policy SA3 seeks to designate an Opportunity Area at Bell Green and Lower Sydenham to help realise the growth and regeneration potential of the area. We strongly support this aspiration.</p> <p>Part (B) of Policy LSA3 sets out the Council’s strategy to prepare a Supplementary Planning Document and/or Masterplan for Bell Green and Lower Sydenham. However, the Policy is not currently clear as to the mechanisms by which the masterplan would engage with local landowners and key stakeholders.</p> <p>We suggest that the following amended wording be included within this policy:</p> <p>To help realise the growth and regeneration potential of Bell Green and Lower Sydenham, and to ensure that new development within the area supports the delivery of the spatial strategy for the Borough, the Council intends to prepare a Supplementary Planning Document and/or Masterplan through consultation with the local community, stakeholders and other key interested parties (such as local landowners). This will complement the Local Plan in setting a long-term development and investment framework for the area. Development proposals must demonstrate how they have engaged positively with planning guidance endorsed or adopted by the Council.</p> <p>The above approach will help to ensure that the Bell Green Masterplan is prepared via comprehensive consultation with key local landowners, stakeholders and the local community. In addition, the Supplementary Planning Document and/or Masterplan for Bell Green and Lower Sydenham should be drafted to ensure consistency with the provisions of the Draft Site Allocation in due course.</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan in general and specifically Policy LSA 03 Bell Green and Lower Sydenham. The Council remains committed to working with its development industry partners to secure growth and good quality place-making in accordance with the new Local Plan.</p> <p>The suggested additional text to Policy LSA 03 B is noted. Whilst the suggested additional text may add detail to the policy it is considered unnecessary to ensure the soundness of the Plan. The Council maintains the existing policy wording, coupled with new Local Plan Policy DM3 Masterplans and comprehensive development with sufficient policy direction on this matter.</p>	The Council will contact the site allocation promoter with the objective of securing a signed SoCG that identifies matters of agreement between the parties and a delivery trajectory.
CON040	REP159	Avison Young OBO Barratt London			2	QD 04	<p>Policy QD4 – Building Heights Draft Policy QD4 sets out the identified locations considered as potentially appropriate for tall buildings, in accordance with London Plan Policy D9. Notably, the Draft Policy identifies the Lower Sydenham/ Bell Green proposed Opportunity Area (which includes the Site) as a potential location appropriate for tall buildings. This approach appears to be underpinned by London Borough of Lewisham’s Tall Building Study Addendum. We broadly support</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy QD 04 Building Heights.</p> <p>The Council maintains that the policy approach to this matter is sound – being justified and effective. It is also noted that the approach to tall buildings is entirely in</p>	No further action required in relation to the new Local Plan.

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							<p>the proposed locations where tall buildings are considered to be appropriate within the Bell Green and Lower Sydenham Opportunity Area – subject to the comments set out above in relation to building heights within the Draft Site Allocation. In addition, Part (c) of this policy identifies that tall buildings in the Lower Sydenham / Bell Green Opportunity Area should be no more than 39.2 meters (12 storeys) to 52 meters (16 storeys).</p> <p>We consider that greater flexibility should be applied to building heights within parts of the Tall Building Zone (if justified in design, planning, townscape and heritage terms). We also highlight that the above comments relate principally to the policy approach concerning building heights within Bell Green and Lower Sydenham. BL has submitted additional comments concerning the Council's approach more generally (and how these relate to BL's other landholding at Catford Island), via a separate representation.</p>	<p>conformity with the London Plan – having been prepared in partnership with the Greater London Authority.</p> <p>The Council reiterates that the master planning and design-led approach applied to the site allocations provide development partners with the opportunity to explore opportunities for innovation. These could provide flexibility in design in respect of massing, bulk, height, and siting – subject to them clearly demonstrating the high quality of what is being proposed. Securing quality design and place is a fundamental requirement of sustainable development.</p>	
CON040	REP160	Avison Young OBO Barratt London			2	HE 02	<p>Policy HE2 – Designated heritage assets Draft Policy HE2 seeks ensure development proposals preserve the significance of Conservation Areas, Listed Buildings, Scheduled Ancient Monuments, Registered Parks and Gardens and London Squares and the Maritime Greenwich World Heritage Site Buffer Zone.</p> <p>We support the approach within Policy HE2 to preserve or enhance the value and significance of the historic environment.</p> <p>However, we consider that Paragraph (H) should be amended as follows to ensure that there is no conflict with the National Planning Policy Framework (NPPF). In line with NPPF, paragraph 201 we suggest that Paragraph (H) should be amended as follows:</p> <p>Development proposals that would result in substantial harm to the significance of a Listed Building and its setting will be strongly resisted, unless where it is demonstrated that the harm is necessary to achieve substantial public benefits that outweigh that harm, in line with the NPPF.</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy HE2 Designated Heritage Assets.</p> <p>The references to NPPF Paragraph 201 and associated suggested additions to the policy are noted. However, the Council concludes that it is unnecessary to ensure soundness to add the suggested text. There is no requirement to replicate and regurgitate national planning policy through a local plan.</p>	No further action required in relation to the new Local Plan.
CON040	REP161	Avison Young OBO Barratt London			2	SD 02	<p>Policy SD2 – Sustainable design and retrofitting</p> <p>We broadly support the Council's objectives to consider sustainable design principles early in the planning and design stages for proposed developments.</p> <p>Part C of the draft Policy requires new non-residential development of 500 sqm or more, to achieve a BREEAM</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy SD 02 Sustainable design and retrofitting.</p> <p>The comment made in relation amending the requirement that major residential developments achieve BREEAM excellent</p>	No further action required in relation to the new Local Plan.

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							<p>‘Excellent’ rating. At present this wording does not acknowledge there may be site specific technical factors that mean an ‘Excellent’ rating cannot be achieved. We therefore request the policy be amended to clarify that this rating is a ‘target’ rather than a fixed policy requirement.</p> <p>We hope that the above points are clear/helpful. As set out above, we overall broadly support the key aspirations of LBL’s Draft Local Plan (subject to the above comments being considered and addressed). We consider that LBL should consider and incorporate the above comments as a means of ensuring that the Local Plan, and its policies, are ‘sound’ (as per NPPF requirements). Should you have any queries and/or wish to discuss the contents of this Representation, please do not hesitate to contact either Colin Sinclair or Isobel Paterson at the above Avison Young office.</p>	<p>ratings to that it become a target is noted. However, it is noted that the policy already provides development partners with the opportunity to demonstrate alternatives should achieving BREEAM excellent demonstrably prove unfeasible. The Council reiterates that securing quality design and place is a fundamental requirement of sustainable development.</p>	
CON040	REP162	Avison Young OBO Barratt London			3	LCA SA 18	<p>Barratt London We write on behalf of Barratt London (BL) in representation to the London Borough of Lewisham’s (LBL) current consultation on the Regulation 19 Draft Local Plan (January 2023).</p> <p>This document is of interest to BL given that their land interest concerning Catford Island, London, SE6 2DD (the Site). For clarity, the location of the Site is shown within Appendix I of this Representation.</p> <p>We understand that LBL seeks to publish a new Local Plan which will set out a shared vision for the future of the Borough along with the planning and investment framework to deliver this vision to 2040. Once finalised the Local Plan will comprise an adopted document within Lewisham’s statutory Development Plan and will replace the current Lewisham Core Strategy (2011), Site Allocations Local Plan (2013) and Development Management Local Plan (2014).</p> <p>Overall, BL broadly supports the principle of the emerging Local Plan to help establish a future vision for Lewisham.</p> <p>However, we do make various comments below concerning how its policies (especially those relating to the Site) should be addressed within this document (to ensure that they meet the tests of ‘soundness’ set out within the National Planning Policy Framework (NPPF)).</p> <p>Context of Representation BL is in the process of preparing a planning application concerning the comprehensive redevelopment of the Site (prepared in consultation with the Borough’s planning officers</p>	<p>The Council notes and welcomes the support offered in relation to the new Local Plan Policy LCA SA 18 Catford island.</p> <p>The Council remains committed to working with its development industry partners to secure growth and good quality place-making in accordance with the new Local Plan.</p> <p>Scale of development – capacity and yield The comments made in relation to these matters are noted. The Council considers its approach towards indicative on-site development capacities, and the associated requirement to optimise yields is considered sound. The master planning approach advocated for this site allocation provides development an opportunity to explore innovative approaches that meet these objectives. These approaches are sufficiently flexible to inform development proposals through evidence. Again, the Council considers this to be sound.</p> <p>Suitability for Tall New Buildings The new Local Plan addresses this matter through Policy QD 04 Building Height. The Council maintains that the policy approach to this matter is sound – being justified and effective. Although the respondent has referred to the gas holder structures that</p>	<p>The Council will contact the site allocation promoter with the objective of securing a signed SoCG that identifies matters of agreement between the parties and a delivery trajectory.</p>

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							<p>and further to consultation with local stakeholders and the community). As such, the Draft Local Plan will become an increasingly significant material consideration in planning decision-making for the Site in moving forward. Catford Island Site Allocation (Site Specific Policy) Within the Draft Local Plan the Site forms part of Draft Site Allocation 18 ('Catford Island'). The Site therefore comprises a significant brownfield redevelopment opportunity within Catford Town Centre and LBL more widely. Overall, Barratt London strongly support the principle of mixed use, residential-led development at the Site given that it is an integral and important redevelopment opportunity within Catford Town Centre which will ultimately be key to delivering sustainable and long-lasting regeneration benefits locally.</p> <p>Development Capacity The current Draft Site Allocation sets out an indicative development capacity of 602 residential units, 6,206sqm of employment and 6,206sqm main town centre uses for 'Catford Island'. In response, we consider that the allocation should clearly set out that these figures are illustrative only. We also suggest that the following wording be added to the Draft Site Allocation: Final development capacity to be determined through a design-led approach to make the best use of land and optimise development in accordance with Local Plan Policy QD6 and London Plan Policy D3 This approach will allow for the delivery of much needed new homes to be optimised beyond the illustrative development capacity thresholds if justified in planning, design and townscape terms. In short, the Draft Site Allocation should allow for flexibility, to ensure that future development at the Site is ultimately deliverable on this suitable, available and achievable brownfield site.</p> <p>Comprehensive Masterplanned Approach We broadly support the aspiration for the Draft Site Allocation to be comprehensively masterplanned. Given the multiple land ownerships within the allocation boundary, we consider that this can be suitably achieved through ensuring that 'neighbourly design principles' are incorporated into each respective part of the Site. We recommend that wording clarifying these matters be added within the allocation wording. This approach will help to ensure that delivery of development on the part of the Draft Site Allocation (owned by BL) is not slowed down by a lack of progress on other parts of the Site. Development on each part of the Site should be designed to not prejudice development coming forward on adjacent land parcels within the allocation.</p>	<p>were historically present on this site, the council maintains that these do not establish a pattern for tall new buildings. The Council maintains that future new development on this site allocation must be guided by Policy QD 04 and the associated Tall Building Suitability at Figure 5.1.</p> <p>The Council reiterates that the master planning and design-led approach applied to the site allocations provide development partners with the opportunity to explore opportunities for innovation. These could provide flexibility in design in respect of massing, bulk, height, and siting – subject to them clearly demonstrating the high quality of what is being proposed. Securing quality design and place is a fundamental requirement of sustainable development.</p>	

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							<p>Development Guidelines</p> <p>The Draft Site Allocation includes various 'Development Guidelines', including broad guidance concerning the location of 'tall buildings' within the allocation boundary. We suggest that this wording be revised as follows (to ensure the appropriate level of flexibility to allow for the delivery of much needed homes to be optimised if possible): The design of development should respond positively to the residential properties to the site's east, having regard to existing townscape features. Tall buildings should be located centrally on the site and not be located along the site's eastern boundary. There is scope to deliver a tall marker building centrally within the Site. Other parts of the Site may also be suitable for taller buildings, providing this approach is justified in planning, environmental and townscape terms.</p>		
CON040	REP163	Avison Young OBO Barratt London			2	QD 04	<p>Policy QD4 – Building Heights Tall Building Suitability Zones</p> <p>Draft Policy QD4 sets out that tall buildings should only be developed in locations identified as appropriate for tall buildings within identified 'Tall Building Suitability Zones'.</p> <p>The Tall Building Zones for Catford are set out in Figure 5.6 of the Local Plan (included as Figure 1 below):</p> <p>Figure 1: Excerpt from Draft Local Plan (showing Catford 'Tall Building Suitability Zones') Whilst the Catford Island site is included within a Tall Building Zone, this currently only identifies the potential for a maximum of 20-storeys to be delivered in the middle of the Site (and maximum of 6 storeys to be delivered around the outer perimeter). These current 'maximum building height thresholds' for Catford Island are too restrictive and would prevent the potential for this brownfield, town centre site to be sensitively redeveloped to optimise the delivery of much needed new homes.</p> <p>In our view, it is essential that Policy QD4 (and Figure 5.6 within the Local Plan) be updated as follows): - The policy should clearly set out that there is potential to deliver building heights beyond those identified within the Tall Building Suitability Zones, if justified in design, planning and townscape terms. - Figure 5.6 within the Draft Local Plan should be updated to align with this approach – a note should be included alongside the image setting out that 'there may be potential to deliver taller buildings than those identified within the Tall Building Suitability Zone if justified in planning, design and townscape terms'. We note that Part C of Draft Policy QD4 does currently identify some scope for flexibility concerning the maximum building heights identified within Tall Building Suitability Zones (i.e. the policy currently states that the</p>	<p>Suitability for Tall New Buildings</p> <p>The new Local Plan addresses this matter through Policy QD 04 Building Height. The Council maintains that the policy approach to this matter is sound – being justified and effective. Although the respondent has referred to the gas holder structures that were historically present on this site, the council maintains that these do not establish a pattern for tall new buildings. The Council maintains that future new development on this site allocation must be guided by Policy QD 04 and the associated Tall Building Suitability at Figure 5.1.</p> <p>The Council reiterates that the master planning and design-led approach applied to the site allocations provide development partners with the opportunity to explore opportunities for innovation. These could provide flexibility in design in respect of massing, bulk, height, and siting – subject to them clearly demonstrating the high quality of what is being proposed. Securing quality design and place is a fundamental requirement of sustainable development.</p>	<p>No further actions required in relation to the new Local Plan.</p> <p>Re-engage external expertise in preparation of rebutting this representation as part of the MIQ process.</p>

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							<p>heights of buildings within these zones should ‘not normally be more than’ the identified heights). However, the Draft Local Plan should go further to allow for taller elements to be delivered in these locations (if justified through a comprehensive design process).</p> <p>We therefore consider it essential that Policy QD4 is updated to include the following wording: The maximum building heights identified for Tall Building Suitability Zones within the Local Plan are illustrative. There may be scope to deliver taller elements in these locations if justified in planning, design and townscape terms (and if delivered as part of a comprehensive design process).</p> <p>At Appendix II, and in support of this representation, we also include a Technical Note prepared by BL’s townscape consultant (Montagu Evans) previously, in response to the Borough’s recent Tall Building Study Addendum consultation. This Note outlines the following position from a townscape perspective:</p> <ul style="list-style-type: none"> • The rationale for 20 storeys being the maximum threshold is not based upon a detailed analysis of individual site constraints and opportunities and does not allow for the potential ability for other sites to accommodate a higher degree of change. • The guidance set out in the Addendum document seeks to inform how the emerging Development Plan is to be delivered. However, the maximum heights set out in the Addendum are not “sound” as defined by paragraph 35 of the NPPF (given that these are not justified through proportionate evidence). • Views analysis has been undertaken concerning the Site (and is detailed within Montagu Evans’ Note). This views analysis demonstrates that: <ul style="list-style-type: none"> o A tall element of more than 20 storeys, delivered within the centre of the Site, would achieve a necessary vertical emphasis and would result in a slender building with an elegant appearance. This would also help realise the opportunity to recreate ‘legibility of townscape’ (which has been lost) within Catford Town Centre and would aid local wayfinding from the area’s 2no. train station to the town centre. o A tall marker building of exemplary design at heart of the Site would allow for a more dynamic skyline and townscape composition to be created. This would arguably reduce visual impacts on adjoining residential areas. o Allowing the principle of a building above 20-storeys at the Site (subject to other relevant design, planning and heritage considerations) would allow for a clearer distinction to be delivered between a central tower element and a ‘mediating layer of buildings around the site perimeter’, 		

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							<p>The Technical Note also includes wireline images (showing a scheme of varying building heights across the Site between 5 and 23 storeys) within key views. In short, it is clear that there is scope to deliver a range of building heights on-site (beyond the maximum height thresholds currently identified within Policy QD4) from a townscape perspective. This further supports our position that Policy QD4 should be updated to allow for greater flexibility concerning maximum building heights at the Site.</p> <p>We also highlight that the 6-storey ‘maximum building height’ threshold identified concerning the perimeter of the Catford Island Tall Building Suitability Zone does not appear to be supported by specific evidence, nor justified within, the Borough’s Tall Building Study Addendum (a key evidence base document for LBL’s emerging Local Plan). As such, this aspect does not appear to be underpinned by robust evidence, and therefore this approach is not considered to be ‘sound’ (as per NPPF requirements). We therefore strongly suggest that the above comments be incorporated.</p>		
CON040	REP164	Avison Young OBO Barratt London			2	EC 011	Policy EC11 – Town centres at the heart of our communities BL broadly supports this draft Policy which focuses on future growth and investment within and around town centres, particularly to optimise the use of land. The delivery of an appropriate mix and balance of residential and main town centre uses within town centres is also strongly supported.	The Council notes and welcomes the support offered in relation to the new Local Plan Policy EC 11 Town Centres at the Heart of our Communities.	No further actions required in relation to the new Local Plan.
CON041	REP165	Savills OBO Bellway Homes Ltd and Peabody Developme nts Ltd			3	LNA SA 18	<p>REPRESENTATIONS SUBMITTED ON BEHALF OF BELLWAY HOMES LTD AND PEABODY DEVELOPMENTS LTD</p> <p>We are instructed by our clients – Bellway Homes Ltd (“Bellway”) and Peabody Developments Ltd (“Peabody”) to submit representations to the following document: <i>“Lewisham Local Plan. An Open Lewisham as part of an Open London”. Proposed submission document – Regulation 19 stage</i>” dated January 2023 (“the draft Local Plan”) in the context of their land ownership and planning application at Sun Wharf, Creekside, Deptford, London, SE8 3DZ (“the site”), located within the London Borough of Lewisham (LBL).</p> <p>These representations relate to the site at Sun Wharf which forms part of the proposed site allocation ‘18: Sun Wharf Mixed-use Employment Location (including Network Rail Arches)’ within the draft Local Plan. The site is outlined in red in the attached site plan (Drawing No. 3336A-PL(90)_00_P01). These representations also relate to the wider policies of the draft Local Plan.</p>	<p>The Council notes and welcomes the broadly supportive comments made by Bellway Homes Ltd and Peabody Development Ltd in relation to the new Local Plan and specifically in relation to Policy LNA SA 18 Sun Wharf Mixed-Use Employment Location (including Network Rail Arches).</p> <p>The Council is committed to working with development industry partners to secure the delivery of the new Local Plan in respect of the scale and nature of planned-for of growth set out in its spatial strategy and site allocations. The Council welcomes support for the comprehensive redevelopment of the site comprised of a compatible mix of commercial, cultural, main town centre and residential uses.</p> <p>Masterplan</p>	<p>Indicative Development Capacity Suggest that the Council consider an amended wording to Paragraph 13.8 –</p> <p><i>“Table 13.1 summarises the overall minimum scale of delivery outcomes expected by the site allocations, both borough-wide and by character area.”</i></p> <p>Accessibility (PTAL rating) Subject to the claimed PTAL rating being proven, the Council can consider identifying this as a factual correction through the minor modifications process – correcting errors as part of the submission process.</p> <p>Cycleway Improvements</p>

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							<p>The site has significant redevelopment potential and we strongly support the principle of the site allocation and the principle of development to deliver a mixed use redevelopment comprising new residential uses, including affordable housing and provision of high quality employment uses. We have set out our detailed comments in this letter.</p> <p>This letter should be read in conjunction with the previous representations (letter dated 09 April 2021) submitted to the Council in response to the Lewisham Local Plan Regulation 18 'Main Issues and Preferred Approaches Document' January 2021 and representations (letter dated 10 June 2022) submitted to the Council in response to "Lewisham Tall Buildings Study Addendum" May 2022.</p> <p>Background <i>Bellway Homes Ltd and Peabody Developments Ltd</i> Bellway is a major national house-builder, with considerable expertise in delivering homes that people want to live in. Bellway is committed to developing the site who have a track record of working in some of London's key regeneration areas. Bellway has delivered high quality mixed use redevelopment schemes within London and the South East. Bellway has established a particularly strong track record in London and deliver over 2,500 units per year across four divisions. Bellway Thames Gateway alone currently has over 30 active development sites. Whilst many in the development sector have been in financial difficulty in recent years, Bellway have emerged as a strong and well-run business with low debt.</p> <p>Peabody Developments Ltd are a wholly owned subsidiary of Peabody Trust. Peabody are a not for profit housing association who provide over 104,000 homes and services to 220,000 residents across London and the Home Counties. Peabody also provide care and support services for around 20,000 customers. Peabody are committed to making sure our homes are affordable and comfortable for everyone. Peabody keep rents low and aim to provide our communities with services and support that give everyone a platform to succeed.</p> <p>2</p> <p>Bellway and Peabody formed a joint venture partnership to deliver the proposed redevelopment scheme at Sun Wharf.</p> <p><i>Site and Surroundings</i> The site measures approximately 0.73 hectares and is located in the northern part of Deptford. The site accommodates existing low-rise warehouse buildings currently in commercial use.</p>	<p>The Council notes the comments made in relation to the existing extant permission and its associated adopted masterplan. The new Local Plan sets out a clear approach to the use and application of master planning through the decision-taking process. The policy already refers to the current extant permission. The council considers that this approach is sound – as the master plan part of that permission. There is a possibility that the extant permission may not be implemented or be subject to variation. Consequently, explicitly linking the policy to a master plan, which could be overtaken by events, is undesirable.</p> <p>Indicative Development Capacity The comments made to the possible residential capacity of the site allocation are noted. The Council considers the current policy wording to be sufficiently flexible to allow for the consideration of higher intensity developments. Nevertheless, the Council acknowledges that amendments could be introduced to Paragraph 13. 8 through the main modifications process that clearly state that the housing figures shown under Table 13.1 are a starting position.</p> <p>Accessibility (PTAL rating) The Council notes the comments made in relation to the PTAL rating of the site allocation. Subject to this being demonstrated as the factual position for the site, the council can consider introducing a minor modification as part of the submission process.</p> <p>Cycleway Improvements The Council acknowledges that it would be unreasonable for a single site allocation to secure the delivery of infrastructure (such as a cycle network) demonstrably extending beyond the place. The Council can consider an amendment to the policy</p>	<p>Suggest that the Council consider an amended wording to Paragraph 15.105 –</p> <p><i>"5. The site must be fully re-integrated with the surrounding street network to improve access and permeability. The site must also contribute towards facilitate the delivery of Cycleway 10 which runs over Ha'penny Bridge and Cycleway 35 running along Creeside."</i></p> <p>Green Infrastructure and Flooding Subject to it being shown as necessary to ensure soundness, the Council could consider an amended wording to Paragraph 15.105</p> <p><i>"8. Development proposals must protect and seek to enhance green infrastructure, the intertidal terrace, the sand martin bank at Deptford Creek and the SINC at Creekside Discovery Centre, The Creek and at Sue Godfrey Park. Developers must work with the Environment Agency to ensure that green infrastructure improvements complement and enable necessary investment in flood risk management."</i></p> <p>Brewery Wharf Subject to it being shown as necessary to ensure soundness, the Council could consider an amended wording to Paragraph 15.106 –</p> <p><i>The proposed Proposals for new residential development located in close proximity to the neighbouring safeguarded Brewery Wharf should be designed</i></p>

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							<p>The site is bound by Creekside (a local vehicle carriageway) and Cockpit Arts (a creative industries business incubator) to the west, railway arches to the south, Deptford Creek to the east, and Kent Wharf to the north. Kent Wharf is a mixed use scheme, also redeveloped by Bellway that has been completed and comprises 143 residential units and circa 1,300sqm of commercial floorspace.</p> <p>The site predominantly has a Public Transport Accessibility Level (PTAL) rating between 3 and 4 (moderate to good). However the site is better than the standard PTAL rating suggests since it is in close proximity to areas of PTAL 6a and is within walking distance to additional station and bus services.</p> <p>The Environment Agency's Flood Map for Planning indicates that the site is situated within Flood Zone 3, within an area benefiting from flood defences.</p> <p><i>Planning Policy Context</i> The site is subject to the following key adopted (current) planning policy designations:</p> <ul style="list-style-type: none"> • Part of Site Allocation SA11 "Sun and Kent Wharf Mixed use Employment Location"; • Deptford Creek/Greenwich Riverside Opportunity Area as designated by the London Plan; • Deptford and New Cross Creative Enterprise Zone as designated by the London Plan; • Deptford Creekside Regeneration and Growth Area; • Air Quality Management Area; and • Archaeological Priority Area. <p><i>Current Planning Application</i> Bellway and Peabody submitted a full planning application (ref: DC/20/118229) for a residential-led, mixed use redevelopment at Sun Wharf proposing 220 homes and creative industry commercial uses together with the delivery of new public realm, play space and landscaping which would deliver on a range of planning and public benefits, including 39% affordable housing (by habitable room) and affordable workspace. The description of development is as follows: "Demolition of all existing buildings and comprehensive redevelopment to provide 3 new buildings ranging in heights of 3 to 19 storeys to provide 220 residential units (C3 Use Class) and 1,132 sqm of commercial floorspace (Use Class E) plus 311sqm of commercial floorspace (Use Class E) in a container building, together with associated wheelchair accessible vehicle parking, cycle parking, landscaping, play areas, public</p>	<p>to clarify that a proportionate contribution towards delivery will be sought.</p> <p>Green Infrastructure and Flooding The Council notes the comments made in relation to the site allocation requirements for the protection and enhancement of green infrastructure across the site. The Council considers this a sound and legitimate requirement for new development, which is not incompatible with possible flood risk mitigation objectives. Indeed, enhancements to the green infrastructure may be complimentary to such mitigation measures. Nevertheless, the Council could consider an amended working through the main modifications process – should this be necessary to ensure soundness.</p> <p>Tall Buildings The Council notes comments made in relation to the matter of tall new buildings and their consideration through the decision-taking process. The Council considers that the policy provides sufficient flexibility and clarity for this matter to be considered through the decision-taking process and consequently that amendments are unnecessary to ensure soundness.</p> <p>Brewery Wharf The Council notes the comments made in relation to the neighbouring Brewery Wharf site and the quantifier used within the text. The Council acknowledges how the neighbouring Brewery Wharf site within the context of the extant permission. It is highlighted that the extant permission may remain unimplemented or subject to variation. Nevertheless, the Council may consider a modification that addresses the quantifier.</p>	<p><i>to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, in line with the Agent of Change principle."</i></p>

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							<p><i>realm, improvements to river wall and public riverside walkway and associated works.</i></p> <p>On 1 September 2022, LBL’s Strategic Planning Committee resolved to grant planning permission. On 3 April 2023, the Mayor of London issued his Stage 2 referral (planning report 2020/6879/S2) stating that the application is acceptable in strategic planning terms and there are no sound planning reasons for the Mayor to intervene in this case, recommending LBL determine the case itself. A decision notice and Section 106 is due to be formally issued imminently. 3</p> <p>National Planning Policy Context Paragraph 35 of the NPPF (National Planning Policy Framework) (2021) states that Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. Plans are ‘sound’ if they are:</p> <ul style="list-style-type: none"> • Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; • Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; • Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and • Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework. <p>These tests of soundness should also be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies of the area.</p> <p>Lewisham Draft Local Plan (Regulation 19) – dated January 2023 We note that the key principles of the adopted Site Allocation is being carried over to the draft Site Allocation as set out in the draft Local Plan. We note the site is subject to the following key draft planning policy designations:</p>		

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							<ul style="list-style-type: none"> • Site Allocation 18: Sun Wharf Mixed-use Employment Location (including Network Rail Arches); • Deptford Creek/Greenwich Riverside Opportunity Area (as designated by the London Plan); • Appropriate Location for Tall Buildings (Deptford Creekside tall building suitability zone); • Mixed-Use Employment Location; • Deptford and New Cross Creative Enterprise Zone (as designated by the London Plan); • Deptford Creekside Cultural Quarter; • Waterlink Way; • Archaeological Priority Area; • Air Quality Management Area; and • Flood Zone 3. <p>Having regards to the national planning context in preparing Local Plans, we have commented on the draft Local Plan, as explained below. For any specific suggested amendments, this is shown via a box, with the relevant reference to the draft Local Plan accordingly, as follows: <i>Suggested amendments to draft Local Plan re: [reference inserted]</i></p> <p>Deletions shown as strikethrough text in red; and Additions shown as underlined text in green.</p> <p>Draft Site Allocation 18: Sun Wharf Mixed-use Employment Location (including Network Rail Arches) ("draft Site Allocation 18")</p> <p>Fundamentally, our Client fully supports the principle of re-development for residential and employment/commercial uses as part of the draft Site Allocation 18 (pp588-591). However, further corrections, clarifications and updates are required, as set out below.</p> <p>Compared to the adopted Site Allocation (SA11), we note that the draft Site Allocation boundary has been amended to omit Kent Wharf. We have concluded this is likely to be because Kent Wharf has been redeveloped (by Bellway) and is now completed and occupied. We note that the updated boundary for the draft Site Allocation therefore includes the remaining land parcels: the Site (i.e. Sun Wharf), as well as the adjacent Cockpit Arts site and Network Rail Arches. The site address should be updated to include "<i>Sun Wharf</i>" as noted below.</p> <p>However, it is fundamental that the draft Site Allocation have regard to the masterplan that was developed and approved as part of the Kent Wharf planning application i.e. the Indicative</p>		

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							<p>Masterplan document approved as per condition 2 (ref: DC/14/89953 dated 17 June 2015). This approved masterplan was in relation to the Kent Wharf, Sun Wharf, Cockpit Arts and Network Rail Arches land parcels. Kent Wharf was therefore the first phase, with Sun Wharf now forming the second phase of the development, and Cockpit Arts and Network Rail Arches as the future subsequent phases. Therefore, the draft Site Allocation should be updated to reference this approved masterplan as noted below.</p> <p>As part of the “<i>Indicative Development Capacity</i>” section of the draft Local Plan, we note that it states 220 net residential units and 1,443 gross non-residential floorspace (p588) makes it clear the latter is gross floorspace sqm). It is also noted these figures reflect the current submitted application which have been developed via a design-led approach. We note that para 13.8 (p437) states these site capacities are indicative only with the optimal capacity established on a case by case basis – which we support. Table 13.1 (p437) provides the indicative delivery number for all site allocations over the 20 year plan period, which includes homes (net units). However, we consider that the drafting should be further refined to make it explicit that the figure for the residential units is a minimum requirement, and indeed a only the starting point, as noted further below.</p> <p>This would ensure that the draft Local Plan is effective in its delivery of new homes, as well as affordable homes.</p> <p>We note that the PTAL states between 0 to 3. However, LBL’s Strategic Planning Committee report in relation to the Sun Wharf planning application (ref: DC/20/118229) confirms the PTAL is 3 to 4 (paras 43, 163 and 465). Fundamentally the site has a better than the standard PTAL rating, since it is in close proximity to areas of PTAL 6a and is within walking distance to additional station and bus services and also the Deptford Town Centre. Therefore, we would consider the text in the draft Local Plan should be updated to “<i>PTAL 3 to 4</i>” as noted below. This would ensure it is consistent and factually correct. <i>Suggested amendments to draft Local Plan re:</i></p> <p><i>Site Allocation 18, table on p588</i> SITE ADDRESS: “Cockpit Arts Centre, 18-2 2 Creekside, Sun Wharf London SE8 3DZ PTAL 2015: 0-3 3-4 2021: 0-3 3-4 2031: 0-3 3-4</p>		

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							<p>For the reasons explained above, under the sub-heading Development requirements (para 15.105) part 1 should be updated as follows: <i>Suggested amendments to draft Local Plan re:</i> <i>Site Allocation 18, para 15.105, Development requirements, No.1 (p589)</i></p> <p>Landowners should work in partnership and development must be delivered to ensure coordination, phasing and balance of uses across the site including the Cockpit Arts Centre and Sun Wharf parcels of land, in line with Policy DM3 (Masterplans and comprehensive development), and having regards to the approved Indicative Masterplan document (Kent Wharf, Condition 2 Planning Permission, ref: DC/14/89953 dated 17 June 2015).</p> <p>Under the sub-heading Development requirements (para 15.105) we note that part 5 states that: <i>"The site [i.e. site allocation] must be fully re-integrated with the surrounding street network to improve ac-cess [sic] and permeability. The site must also facilitate the delivery of Cycleway 10 which runs over Ha'penny Bridge and Cycleway 35 running along Creekside."</i></p> <p>Both of these cycle routes fall outside of, and have an extensive reach beyond the site, and the draft Site Allocation boundary. Whilst the principle of improved access to these cycleway routes is generally supported, it is unreasonable to require a draft site allocation <i>"to facilitate the delivery"</i> of both these cycleways, and would not be effective and would not be justified, contrary to the NPPF. The appropriate planning mechanism in which to address the relevant planning obligations is applying the relevant statutory tests set out in Regulation 1221. We would therefore suggest the following amendments which would seek to promote future redevelopment to be designed so that they promote connections with the surrounding street network, including the cycleways: <i>Suggested amendments to draft Local Plan re:</i> <i>Site Allocation 18, para 15.105, Development requirements, No.5 (p589)</i></p> <p>The site must be fully re-integrated with the surrounding street network to improve ac-cess [sic] and permeability. The site must also facilitate the delivery of Cycleway 10 which runs over Ha'penny Bridge and Cycleway 35 running along Creekside.</p> <p>The design of development proposals should seek to promote appropriate connections to the surrounding street network,</p>		

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							<p>including potential connections to Cycleway 10 (which runs over Ha’penny Bridge) and Cycleway 35 (running along Creekside).</p> <p>Under the sub-heading Development requirements (para 15.105) we note that part 8 refers to protecting and enhancing green infrastructure relating and this is supported in principle. However, this must be balanced against the Environment Agency requirements and the need to protect against flood risk. We therefore suggest this is made explicit, as per the suggestion below.</p> <p><i>Suggested amendments to draft Local Plan re: Site Allocation 18, para 15.105, Development requirements, No.8 (p590) Development proposals must protect and seek to enhance green infrastructure, the intertidal terrace, the sand martin bank at Deptford Creek and the SINC at Creekside Discovery Centre, The Creek and at Sue Godfrey Park – and balanced against any requirements from Environment Agency needed to mitigate against flood risk.</i></p> <p>Under the sub-heading Development guidelines (para 15.106) we note that part 5, support the principle of tall buildings. As it relates to the text that tall building elements should be located to the south east corner of the site marking the junction of Creek and the railway viaduct, whilst this is reflective of the current planning application it is considered that the policy text is overly prescriptive and should be amended to ensure it is more flexibly drafted i.e. it should simply say that tall buildings and their precise location will be a design-led approach. This will ensure there is sufficient flexibility in the publication Local Plan and that the site is deliverable, and would therefore be effective.</p> <p><i>Suggested amendments to draft Local Plan re: Site Allocation 18, para 15.106, Development guidelines, No.5 (p590) The potential for taller building elements to reflect the surroundings should be considered as part of a design led approach, and should ensure minimal impact on the Grade II listed railway viaduct and the Lifting Bridge Structure as well as the setting of the Grade I Listed St Paul’s Church in Deptford and the LVMF panoramic view from Blackheath Point. The precise location for tTaller elements should be informed by a design-led approach located in the south eastern corner of the site, marking the junction of Creek and the railway viaduct.</i></p>		

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							<p>Under the sub-heading Development guidelines (para 15.106) we note that part 6, there is reference the safeguarded Brewery Wharf. We note that LBL's Strategic Planning Committee report (dated 1 September 2022) in relation to the Sun Wharf planning application (ref: DC/20/118229) did not view the site being in 'close proximity' to Brewery Wharf as the report (para 243 p41) states <i>'the development site lies some distance away from Brewery Wharf'</i> with the Wharf located approximately 285m to the north east of the application site. Therefore, we consider that drafting be amended as follows.</p> <p><i>Site Allocation 18, para 15.106, Development guidelines, No.6 (p590)</i></p> <p><i>The proposed residential development located in close proximity to the Regard should be had to the safeguarded Brewery Wharf (located approximately 285m to the north east of the site), and proposed residential development should be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, in line with the Agent of Change principle.</i></p>		
CON041	REP166	Savills OBO Bellway Homes Ltd and Peabody Developme nts Ltd			2	EC 07	<p>Draft Policy EC7 Mixed-use Employment Locations (MEL)</p> <p>Our Client supports the principle mixed use redevelopment of MELs and Site Allocations within MELs through the masterplan process as outlined in Part A and Part B. However, the policy should make a more explicit reference to residential uses to be included as part of regeneration, as noted below.</p> <p>We note Part C of the draft policy seeks the long term protection of industrial capacity on MELs, ensuring there is no net loss of existing industrial capacity.</p> <p>This is not consistent with London Plan Policy E4 (Land for industry, logistics and services to support London's economic function) as Part C of that policy states <i>'the retention, enhancement and provision of additional industrial capacity across the three categories of industrial land set out in Part B [of London Plan Policy E4] 7 should be planned, monitored and managed'</i>.</p> <p>Whilst the site vacancy is scored as low in the Lewisham Employment Land Study (2019) with regard to Sun and Kent Wharf it states at para (5.60 p 51) <i>"If the current occupiers vacate the site it may be difficult to find a new occupier due to the constrained nature of the access and poor site coverage"</i>.</p>	<p>The Council notes and welcomes the broad level of support for the new Local Plan Policy EC 07 Mixed-use Employment Locations (MEL).</p> <p>The Council notes the comments made in relation to the new Local Plan Policy EC 07 in respect of its consistency with the London Plan. However, the Council suggests that the respondent is mistaken. The London Plan actively seeks to maintain and enhance the provision of industrial employment land opportunities. As a fact, London Plan Policy E4 not only speaks to the need for the retention, enhancement and provision of additional industrial capacity but also states that any release be "facilitated through the processes of industrial intensification, co-location and substitution." The Council maintains that this is a sound policy approach for safeguarding employment sites that remain viable and whose enhancement (over the course of the plan period) is deliverable and developable.</p>	No further changes required to the new Local Plan.

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							<p>The policy as its currently drafted does not allow for the site to be managed effectively to address possible vacancy issues in the future. Additionally, para 22 of the NPPF states that long-term protection of sites for employment uses should be avoided where there is no reasonable prospect of the site being used for allocated employment uses. Therefore, it would not be reasonable to include this, and should be omitted. We therefore suggest the following amendments:</p> <p><i>Suggested amendments to draft Local Plan re: EC7 Mixed-use Employment Locations (MEL), Parts A and C, p233</i></p> <p><i>A. The comprehensive redevelopment of Mixed-use Employment Locations will be supported in order to facilitate their renewal and regeneration (which may include residential uses) and to secure provision for a range of commercial uses, including new modern workspace with priority given to Class E(g) office and light industrial uses. All development proposals within MELs must be delivered in accordance with relevant site allocation policies and a site-wide masterplan. Development proposals must provide demonstrable improvements in the overall physical and environmental quality of the MEL and ensure that new development is well integrated with adjoining and neighbouring land uses.</i></p> <p><i>[...]</i></p> <p><i>C Where the comprehensive development of an MEL, or a site within the MEL, has been delivered through the masterplan process all future proposals involving the redevelopment or change of use of land and floorspace must:</i></p> <p><i>a. Retain, and wherever possible seek to increase, the proportion of industrial capacity across the MEL, as originally approved in the masterplan and planning consent; and</i></p> <p><i>b. Ensure there is no net loss of existing industrial capacity.</i></p> <p>Making these changes would ensure that the draft Local Plan is consistent with regional and national policy and effective in its delivery.</p>	<p>The Council notes the specific references to national planning policy (Para 22). The Council contends that the new Local Plan is indeed looking forward, planning for securing employment provision for a minimum of fifteen years, and identifying longer-term requirements and opportunities. Again, the Council considers this to be a sound approach.</p>	
CON041	REP167	<p>Savills</p> <p>OBO</p> <p>Bellway Homes Ltd and Peabody Developments Ltd</p>			2	HO 01	<p>Draft Policy HO1 Meeting Lewisham’s Housing Needs; and Draft Appendix 6 Housing Trajectory and Give Year Housing Land Supply</p> <p>Our Client is fully supportive of Site Allocation 18 providing new homes (C3).</p> <p>Our Client fully supports Policy HO1, noting the relevant reference to the London Plan Table 4.1 which sets out a minimum 10 year housing target for Lewisham. This sets out that the Council will ensure the London Plan ten year housing</p>	<p>The Council notes and welcomes the supportive comments made in relation to the new Local Plan Policy HO 01 Meeting Lewisham’s housing needs.</p>	<p>No further changes required to the new Local Plan.</p> <p>Suggest that the Council note the housing delivery trajectory identified in the respondent’s comments and use this as a basis for agreeing a SoCG with the development partner.</p>

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							<p>target is exceeded. It is important to note the Lewisham SHMA 2022 indicates (para 5.16 p 84) a higher housing need for Lewisham of 2,334 per annum over a 10 year period (2021 to 2031). This site represents a significant opportunity for mixed use development that can contribute towards housing provision and the above housing targets.</p> <p>We also note an up to date housing trajectory and five year housing supply for the Borough with inclusion of Site Allocation 18. Sun Wharf is listed in North Area (No.18) with a site area of 1 hectare (we note this relates to the entire site allocation, not just Sun Wharf), noting that:</p> <ul style="list-style-type: none"> For Year 4 (2026/27) 180 units would be delivered/completed; and For Year 5 (2027/28) 40 units would be delivered/completed. <p>Our Client fully supports Parts D, E and F that aim to provide a mix of unit sizes and housing choice on a case by case basis. We acknowledge Table 7.1 (Target unit size mix for affordable housing) which sets specific targets on affordable products to ensure stronger requirements for family housing.</p> <p>Our Client is supportive of the need to deliver a range of housing types. We note that Lewisham's SHMA 2022 in (paragraph C.12 p 144) with regard to open-market housing outlines flexibility (to meet changing needs over time) as one of the current limitations of the housing market in Lewisham from surveyed stakeholders. Therefore, it is essential that an appropriate mix of housing is established on a case-by-case basis.</p>		
CON041	REP168	Savills OBO Bellway Homes Ltd and Peabody Developme nts Ltd			2	HO 03	<p>Draft Policy HO3 Genuinely Affordable Housing</p> <p>Our Client strongly advocates for the delivery of new affordable homes to meet Lewisham's housing requirements. We acknowledge and support the Council's threshold approach to viability in accordance with the London Plan Policy H5 and the principle of increased affordable housing, and for new homes to be genuinely affordable, subject to viability.</p> <p>We support Part F (Threshold approach to viability) and Part G (Viability Tested Route) that ensure conformity and consistency with the London Plan and the Affordable Housing and Viability Supplementary Planning Guidance. The site represents a key opportunity for the delivery of a mixed use redevelopment brought forward by our clients to contribute towards affordable housing.</p>	<p>The Council notes and welcomes the supportive comments made in relation to the new Local Plan Policy HO 03 Genuinely affordable housing.</p> <p>The Council notes and acknowledges that national planning policy seeks to ensure that plan-making and decision-taking should not endanger the viability of new development by setting unrealistic requirements. The Council notes that the new Local Plan has been the subject of a whole plan viability assessment process and on that basis the policy approach is justified.</p>	No further changes required to the new Local Plan.

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							We also note that Part K may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. Our Client is supportive of the need to deliver a range of housing types that promote inclusive and mixed communities and advocates for policies that adopt a flexible approach to housing mix. This will ensure that the draft Local Plan is effective and deliverable.	Furthermore, the threshold approach set out in the new Local Plan is itself grounded in the London Plan. For that reason, the new Local Plan is consistent with the London Plan approach to this matter.	
CON041	REP169	Savills OBO Bellway Homes Ltd and Peabody Developme nts Ltd			2	QD 06	<p>Draft Policy QD6 Optimising Site Capacity</p> <p>Our Client strongly supports a design-led approach to make the best use of land in order to optimise site capacity so as to deliver redevelopment and its associated planning and public benefits.</p> <p>We also note Part C which aims to address concerns about indicative site development capacities on site allocations. Part C states “<i>Development parameters for specific sites are set out in this Local Plan (Part 3 – site allocations). Where development proposals do not accord with the indicative capacity set out in a site allocation policy they will only be supported where it is clearly demonstrated the optimal capacity will be achieved, having regard to (A) and (B) above...</i>”.</p> <p>We consider that current drafting is confusing when read in conjunction with Part A and Part B of the policy – we question how a development proposal can comply with an “indicative capacity” – when capacity is indicative.</p> <p>We therefore, Part C be further refined to make it clear that regard should be had to the indicative capacities. Furthermore, the indicative residential units should be considered as the minimum.</p> <p>These suggested amendments are outlined as follows:</p> <p>Suggested amendments to draft Local Plan re: QD6 Optimising site capacity, Part C, p103 A Development proposals must use the design led approach to make the best use of land and optimise the capacity of a site, with reference to Policy QD1 (Delivering high quality design in Lewisham). B To establish the optimum capacity of a site consideration must be given to the appropriate development density having regard to: a. The type and nature of uses proposed; b. The site context, with reference to the site’s immediate and surrounding area, taking into account: i. Location setting;</p>	<p>The Council notes and welcomes the broad supported offered in relation to the new Local Plan QD 06 Optimising Site Capacity.</p> <p>The Council notes the specific comments made in relation to Policy QD 06 A and B. The Council considers that the Policy is sound and does not require any amendment.</p> <p>The also notes the specific comments made in relation Policy QD 06 C. The Council considers that the policy requirement that proposals secure an optimal capacity that also meets or exceeds the identified indicative site capacity is clear. On that basis, the Council considers the Policy is sound and does not require amendment.</p>	No further changes required to the new Local Plan.

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							<p>ii. Local distinctiveness and character, including heritage assets, with consideration given to the prevailing and/or emerging form and proportion of development in the area;</p> <p>c. Public Transport Access Levels, taking into account current levels and future levels expected to be achieved by the delivery of planned public transport infrastructure; and</p> <p>d. Capacity of infrastructure to support the land uses and density proposed, having regard to the individual and cumulative impacts of development.</p> <p>C Development parameters for specific sites are set out in this Local Plan (Part 3 – site allocations). Where d Development proposals should have regard to do not accord with the indicative capacity set out in a site allocation policy, and seek to achieve they will only be supported where it is clearly demonstrated the optimal capacity will be achieved, having regard to (A) and (B) above.</p>		
CON041	REP170	<p>Savills</p> <p>OBO</p> <p>Bellway Homes Ltd and Peabody Developments Ltd</p>			2	QD 04	<p>Draft Policy QD4 Building Heights; and Draft Schedule 12: Tall Building Suitability Zones</p> <p>Our Client fully supports Policy QD4 as this would contribute to the effective delivery of the site, which would contribute to LBL’s regeneration objectives.</p> <p>We also note Figure 5.1 (Tall Buildings suitability plan) and corresponding Figure 5.4 (Deptford Creekside tall building suitability zones) and Table 21.12 in Schedule 12 (Table showing Tall Building Suitability Zones) of the draft Local Plan proposes to designate “Sun Wharf Mixed-use Employment Location (including Network Rail Arches)” as an appropriate location for tall buildings – stating a maximum height of 20 storeys.</p> <p>Whilst we fully support the principle of tall buildings and 20 storeys, the drafting is overly prescriptive and must be updated to ensure there is sufficient flexibility since the precise heights would be developed through a design-led approach. Therefore the text “maximum” should be replaced with “approximately”.</p>	<p>The Council notes and welcomes the broad level of support offered by the respondents in relation to the new Local Plan Policy QD 04 Building Heights.</p> <p>The Council also notes the respondent’s comments that the policy approach is overly prescriptive. In this respect the Council acknowledges that the decision-taking process, incorporating master planning and design-led approaches, may provide opportunities to explore greater levels of development intensity. However, the Council highlights that the new Local Plan Policy QD 04 has been prepared in accordance with the London Plan Policy D9 Tall Buildings; under which Paragraph 3.9.2 states that local planning authorities (through their plan-making) must “...determine the maximum height that could be acceptable”. Within this context the Council maintains that the new Local Plan is sound.</p>	No further changes required to the new Local Plan.
CON041	REP171	<p>Savills</p> <p>OBO</p> <p>Bellway Homes Ltd and</p>			2	QD 08	<p>QD8 High Quality Housing Design</p> <p>Our Client fully supports a high quality design approach for development proposals as set out in Policy QD8.</p> <p>The drafting of Part G relating to north-facing single aspect dwellings needs to be made clearer that it relates to specifically north-facing single aspect units.</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy QD 08 High Quality Housing Design.</p> <p>The Council notes the specific comments made in relation to the Mayor’s Housing</p>	No further changes required to the new Local Plan.

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		Peabody Developme nts Ltd					<p>The draft of Part E needs to be elaborated to take into the daylight and sunlight guidance set in the Mayor's Housing SPG (2016), specifically paras 1.3.45, 1.3.46 and 2.3.47. 10</p> <p>The suggested amendments are set out in the table as follows:</p> <p><i>Suggested amendments to draft Local Plan re:</i> <i>QD8 High quality housing design, Part E and G, p111</i> <i>E. Development proposals for housing must be designed to protect and enhance amenity of building occupants, as well as that of adjoining site users and uses, in line with Policy QD7 (Amenity and agent of change). They must ensure adequate provision of natural light with reference to the latest Building Research</i> <i>Establishment (BRE) good practice guidance, currently BR209: Site layout planning for daylight and sunlight, or suitable equivalent. The BRE Guidance and its quantitative results must be applied flexibility and sensitively and consider use of alternative targets for sites located in high density locations, town centres, part of phased development or part of a masterplan, taking into account the local circumstances, the need to optimise housing capacity.</i> <i>[...]</i> <i>G. Development proposals for housing must maximise the provision of dual aspect dwellings. Proposals for north-facing single aspect dwellings, particularly north facing dwellings will be resisted and only be permitted where it can be suitably demonstrated that the development will provide a more appropriate design solution than a dual aspect dwelling, having particular regard to: [...]</i></p>	<p>SPG (2016). The Council highlights that the Policy makes explicit reference to the London Plan Policy D6. The Council notes that the London Plan Policy D6 states – “The Mayor will produce guidance on the implementation of this policy for all housing tenures.” This is because the London Plan post-dates the now historic Housing SPG. Consequently, it is unsound for the new Local Plan to reference an out-of-date document.</p>	
CON041	REP172	Savills OBO Bellway Homes Ltd and Peabody Developme nts Ltd			2	EC 04	<p>Draft Policy EC4 Low Cost and Affordable Workspace We note the approach in para 8.24 that states “<i>all major commercial development, including mixed-use developments with a commercial component of 1,000 square metres or more gross, must ensure that 10 per cent of new workspace is delivered as affordable workspace</i>” .</p> <p>Whilst our Client supports the approach that this would be subject to viability. With regard to the formula for affordable workspace payments in lieu set out in Table 8.2, this must also be subject to viability.</p>	<p>The Council welcomes the broad support for the new Local Plan's approach towards securing affordable workspace through new commercial development. The Council notes that no specific modifications to the new Local Plan have been identified or sought.</p> <p>National planning practice guidance clearly states that plans should set out the contributions expected from development. The new Plan is supported by a robust and proportionate evidence, which includes a viability assessment of the spatial strategy, site allocations and planning policies. This evidence demonstrates that there is sufficient viability within the Plan. In this</p>	No further changes required to the new Local Plan.

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								respect the Council considers the approach taken by the new Plan to be sound. National planning practice guidance is also clear as to how development viability be considered during the decision-taking process. There are opportunities for those proposing new development to present robust evidence that market conditions have changed sufficiently to allow for a re-assessment of viability. Such evidence can subsequently be tested through the development management process.	
CON041	REP173	Savills OBO Bellway Homes Ltd and Peabody Developments Ltd			3	LNA 01	Policy LNA1 Lewisham's North Area Principles We support the principle of Policy LNA1 that seeks to ensure the North Area benefits from a high quality design-led regeneration to secure the long term vitality and vibrancy of the North Area.	The Council welcomes the support for new Local Plan Policy LNA1.	No further changes required to the new Local Plan.
CON041	REP174	Savills OBO Bellway Homes Ltd and Peabody Developments Ltd			3	LNA 03	Draft Policy LNA3 Creative Enterprise Zone (CEZ) Our Client supports the principle of draft Policy LNA3 in the retention and provision of clusters of creative and cultural industries subject to viability and where there is a demand for a proposed use. We note reference to Use Class Order Class E and further clarifications in Part B(e) that designates a Cultural Quarter at Deptford Creekside with the objective of facilitating the creation of additional clusters, new high quality workspace and facilities.	The Council welcomes the support for new Local Plan Policy LNA3.	No further changes required to the new Local Plan.
CON041	REP175	Savills OBO Bellway Homes Ltd and Peabody Developments Ltd			2	SD 09	Draft Policy SD9 Lewisham's Waterways Our Client supports in general Policy SD9 (Lewisham's Waterways) that relates to water management and flood risk. We note Part A that states " <i>Potential to facilitate water transport, for both passengers and freight</i> ". This ensures redevelopments have sustainable methods of transport to the site. However, policy should state " <i>subject to feasibility</i> ". 11 As previously mentioned, we note the supporting text in paragraph 11.56 states prescriptive relief (set back distances) between new development and river frontages – unless otherwise agreed by the Council and Environment Agency, with buffer zones left free of permanent structures and integrated into a new development to enhance their amenity value. It states as follows:	The Council welcomes the broad support for new Local Plan Policy SD9. The Council notes the suggestion that Policy SD9 A be amended to include the additional text " <i>subject to feasibility</i> ". The Council does not consider this addition necessary. The wording for Policy SD9 already clearly states that development give "...particular consideration to their...F. Potential to facilitate water transport, for both passengers and freight". The Council considers that the existing wording provides development partners with sufficient flexibility to	No further changes required to the new Local Plan.

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							<p><i>In order to ensure there is no adverse impact of the natural functioning of a watercourse, or the integrity of a flood defence, all new development must maintain an undeveloped buffer zone with an adequate set back distance from the watercourse. A relief of 8 metres from a main river and 5 metres from an ordinary watercourse should be secured, unless otherwise agreed by the Council and the Environment Agency. Buffer zones should be left free of permanent structures, ensure adequate access for the maintenance of flood defences and be sensitively integrated into development in order to enhance their amenity value...” (Our Emphasis.)</i></p> <p>It is considered that the drafting of the policy is currently overly prescriptive and would unnecessarily constrain redevelopment. This would not be effective and could restrict the delivery of future redevelopment and any associated full benefits, including new homes, new affordable homes and new jobs. We consider that each site must be considered on its own merits and any relief (set back distance) between new development and the frontage to be agreed with the Council and the Environment Agency on a case-by-case basis, having regards to all relevant technical matters, site specific constraints and development that would be brought forward, including the overall planning and public benefits.</p> <p>Whilst it is acknowledged that the current drafting includes the following text: “<i>unless otherwise agreed by the Council and the Environment Agency</i>” – and could potentially allow an alternative set back distance to be agreed with the Council and Environment Agency, we consider the policy should be updated as below. This would ensure that the policy is effective and deliverable.</p> <p><i>Suggested amendments to draft Local Plan re: SD9 Lewisham’s waterways, Part A, p111, p379 & para 11.56 (p382) A Waterways provide multifunctional social, economic and environmental benefits that support sustainable neighbourhoods and communities. Development proposals should identify and respond positively to the unique attributes of waterways, giving particular consideration to their:</i></p> <p><i>a. Environmental function and ecological qualities; b. Contribution to the Borough’s network of open spaces; c. Recreational and amenity value; d. Distinctive features that help to shape and reinforce the Borough’s physical, cultural and historical character;</i></p>	<p>consider such potential through the development management process, and either facilitate its delivery or discount it, based on that consideration. Consequently, the Council considers the existing wording to be effective and therefore sound.</p> <p>The Council notes the comments raised in relation to supporting text Paragraph 11.56, which identifies a baseline requirement for the natural functioning of a watercourse, or the integrity of a flood defence. This requirement is important to ensure that the potentially harmful impacts, upon new development, of flooding events are anticipated and mitigated. The new Local Plan Policy SD7 is clear in setting out the objective that the Council will work positively with partners to minimise and manage flood risk in relation to new development. In this respect development partners have a responsibility to their future customers, the Borough’s future residents, to ensure that their products are not exposed to potentially harmful flood risk. In this respect, the supporting text wording is considered reasonable.</p> <p>It is noted that the representation simply states that the requirement of the supporting text could restrict delivery. The representation provides no evidence to clearly demonstrate that it will. The Council considers that the supporting text provides prospective development partners with sufficient flexibility to negotiate alternative approaches with the Environment Agency and the Council in circumstances where they are supported by robust and sound evidence.</p>	

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							<p><i>e. Support for the visitor economy; and</i></p> <p><i>f. Potential to facilitate water transport, for both passengers and freight, subject to feasibility.</i></p> <p>[...]</p> <p><i>Para 11.56 – In order to ensure there is no adverse impact of the natural functioning of a watercourse, or the integrity of a flood defence, all new development must maintain an undeveloped buffer zone with an adequate set back distance from the watercourse. A relief of 8 metres from a main river and 5 metres from an ordinary watercourse should be secured, unless otherwise agreed by the Council and the Environment Agency. Buffer zones should be left free of permanent structures, ensure adequate access for the maintenance of flood defences and be sensitively integrated into development in order to enhance their amenity value. Development within 20 metres of a bank of a main river will need Environment Agency consent. Some rivers have defined flood defence assets and proposals will be required to identify assets and these into consideration, where appropriate.</i></p>		
CON041	REP176	Savills OBO Bellway Homes Ltd and Peabody Developments Ltd			2	DM 03	<p>Draft Policy DM3 Masterplans and Comprehensive Development</p> <p>Our Client is supportive of Policy DM3 as masterplans play a key role in clarifying design, capacity and phasing of a site and ensure coordination between various stakeholders.</p>	The Council welcomes the support for the new Local Plan Policy DM3 in respect of the role masterplans have in delivering high quality places.	No further changes required to the new Local Plan.
CON041	REP177	Savills OBO Bellway Homes Ltd and Peabody Developments Ltd			0	General	<p>Public Examination</p> <p>On behalf of our Client we consider it is necessary we attend the oral part of the Examination in Public. We would be grateful if you could keep us updated.</p> <p>Conclusion</p> <p>In summary, our Client supports the principle of the Site Allocation 18 for the redevelopment of the site which would provide significant public benefits including employment and new housing. With the suggested amendments we consider that the draft Local Plan would be sound.</p> <p>However, some of the items noted above in their current form would constrain potential redevelopment options and would therefore, not be effective in their delivery and would not be consistent with national policy. Therefore, it is considered that the draft Local Plan is not sound.</p>	<p>The Council notes and welcomes the broad support offered by Bellway Homes Ltd and Peabody Developments Ltd in relation to the new Local Plan as a whole.</p> <p>The Council notes the suggested amendments and additions proposed by the respondent in relation to the new Local Plan, which are perceived as being necessary to make the new Local Plan sound. The Council notes these suggestions but considers them unnecessary.</p> <p>The Council notes the general comment that the new Local Plan introduces “constrains” that in the respondent’s opinion have an impact on the ability of</p>	No further changes required to the new Local Plan.

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							Please do not hesitate to contact me or my colleague arrange a meeting and/or you have any further queries. In any event, we would be grateful if you could keep us updated of the progress with the new draft Lewisham Local Plan	development partners to deliver future growth. The Council notes that a key component objective of our national planning system is to intervene in situations where the market has failed. What the respondent's considers constraints are indeed interventions to address inequalities and the potential for unsustainable development. It is unclear to the Council why the respondents would not wish to secure the best and sustainable product possible for their customers – in respect of design quality, affordability and mitigation from possible on-site risks.	
CON042	REP178	Quod OBO Landsec			3	LCA SA 02 Introduction	<p>Lewisham Reg 19: Representations by Landsec</p> <p>Landsec welcomes the opportunity to engage with Lewisham Council on its Regulation 19 Local Plan (the "Reg 19 Plan").</p> <p>Landsec supports the Council's ambition for growth and renewal across the borough and within Lewisham Major Town Centre, its principal town centre. Landsec commends the Council on many of its development plan policies and considers that these are consistent with national planning policy and the London Plan.</p> <p>The key modifications to the Reg 19 Plan proposed by Landsec are summarised below.</p> <ul style="list-style-type: none"> ▪ We proposed that indicative capacities enclosed in Site Allocation 2 are revised to reflect site specific proposals by Landsec, pre-application discussions and Landsec's up to date needs assessment. The indictive capacity should refer to 2,500 homes and 40,000 sqm of main town centre floorspace. ▪ Site Allocation 2 should include additional text which recognises the significant infrastructure requirements and abnormal costs of delivering the site allocation policy objectives. ▪ The maximum building height threshold for Site Allocation 2 (Figure 5.5 and Schedule 12) should increase to 30 storeys to reflect the transition with land to the north. Additional text is required to recognise that the maximum height threshold proposed is indicative and may be exceeded through detailed pre-application analysis. We also suggest that the heights in metres should be removed from Policy QD4 as the floor-to-floor assumptions do not reflect the design requirements for town centre development. We suggest that the tall building zone (eastern boundary) be revised to align to the rear of the 	<p>The Council notes the introductory comments made in relation to the new Local Plan. The broad level of support offered in respect of "<i>many of its development plan policies</i>" is welcomed.</p> <p>The consequential modifications, which are being sought to the new Local Plan Policy LCA SA 02 Lewisham Shopping Centre are noted.</p>	No further changes required to the new Local Plan.

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							<p>high street buildings along the eastern boundary to reflect the Council's tall building evidence base and include land to the northeast corner of Site Allocation 2.</p> <p>▪ The Council's retail capacity figures should be updated, or additional text included to confirm that updated analysis is required on a site-by-site basis to support specific planning applications. The retail impact tests should be removed for town centre planning applications to ensure consistency with national policy.</p> <p>Landsec is willing to enter a statement of common ground with the Council in advance of the Local Plan examination in public.</p>		
CON042	REP179	Quod OBO Landsec			3	LCA 02	<p>1 Executive Summary</p> <p>1.1 Landsec welcomes the opportunity to engage with Lewisham Council on its Regulation 19 Local Plan (the "Reg 19 Plan").</p> <p>1.2 Landsec supports the Council's ambition for growth and renewal across the borough and within Lewisham Major Town Centre, its principal town centre. Landsec commends the Council on many of its development plan policies and considers that these are consistent with national planning policy and the London Plan.</p> <p>1.3 Landsec is the owner of Lewisham Shopping Centre, the principal site allocation and development opportunity for Lewisham Town Centre. Site Allocation 2 of the Reg 19 Plan is largely comprised of the shopping centre.</p> <p>1.4 Whilst these representations are written to be read as a comprehensive document, included at Appendix 1 is the Council's completed 'Proposed Submission document Regulation 19 draft Consultation Questions' Form which includes cross references.</p> <p>Summary of Proposed Modifications to the Regulation 19 Local Plan</p> <p>1.5 The key modifications to the Reg 19 Plan proposed by Landsec are summarised below.</p> <p>▪ We proposed that indicative capacities enclosed in Site Allocation 2 are revised to reflect site specific proposals by Landsec, pre-application discussions and Landsec's up to date needs assessment. The inductive capacity should refer to 2,500 homes and 40,000 sqm of main town centre floorspace.</p>	<p>The Council notes the further introductory and contextual comments that provide additional background to the representations made in direct and associated relation to the new Local Plan Policy LCA 02 Lewisham major centre and surrounds and Policy LCA SA 02 Lewisham Shopping Centre.</p> <p>The Council notes and welcomes the support offered in relation to the ambition for growth (across the Borough) and the continued investment of Lewisham Major Centre (to enable its future designation as a Metropolitan Centre).</p> <p>The Council remains committed to working positively with its development partners to secure the delivery of the growth planned-for through the new Local Plan – with the specific outcome of securing successful and sustainable places that meet the needs of our residents and communities. The welcomes the broadly positive overtures from the respondent – particularly in relation to evolving development proposals for their land-interest. The Council considers that the comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community and residential uses of the Lewisham Shopping Centre will support the delivery of the spatial strategy. The Council notes that the respondent does not challenge this objective.</p>	No further actions required in relation to the new Local Plan.

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							<p>▪ Site Allocation 2 should include additional text which recognises the significant infrastructure requirements and abnormal costs of delivering the site allocation policy objectives.</p> <p>▪ The maximum building height threshold for Site Allocation 2 (Figure 5.5 and Schedule 12) should increase to 30 storeys to reflect the transition with land to the north. Additional text is required to recognise that the maximum height threshold proposed is indicative and may be exceeded through detailed pre-application analysis. We also suggest that the heights in metres should be removed from Policy QD4 as the floor-to-floor assumptions do not reflect the design requirements for town centre development. We suggest that the tall building zone (eastern boundary) be revised to align to the rear of the high street buildings along the eastern boundary to reflect the Council's tall building evidence base and include land to the northeast corner of Site Allocation 2.</p> <p>▪ The Council's retail capacity figures should be updated, or additional text included to confirm that updated analysis is required on a site-by-site basis to support specific planning applications. The retail impact tests should be removed for town centre planning applications to ensure consistency with national policy.</p> <p>1.6 Landsec is willing to enter a statement of common ground with the Council in advance of the Local Plan examination in public.</p> <p>Background</p> <p>1.7 During 2020 Landsec undertook a detailed review of its Urban Regeneration portfolio in response to the structural change nationally in the retail sector. Town centres and the way we shop have been rapidly changing due to the growth of online shopping. The retail sector is going through its biggest upheaval since the 2008 financial crash which instigated structural change well before the global pandemic. COVID-19 has accelerated the change and the demand for retail floorspace is changing. The Arcadia Group (Topshop, Dorothy Perkins, Burton and Miss Selfridge); Debenhams; Monsoon; Aldo; Antler; Oasis and Warehouse; Debenhams; Cath Kidston; Laura Ashley; and Peacocks are just a few established high street retailers who have gone into administration and left the high street.</p> <p>1.8 How town centres, including Lewisham, are used by local people and retailers will change forever. Landsec's</p>	<p>The Council notes the contextual comments that support the respondent's position on several detailed components to their current development proposal. These specifically relate to the respondent's desire for further flexibility for the consideration of the quantum of development, vertical intensity and mix of uses that are appropriate for Lewisham Major Centre and the specific site allocation. The Council considers that the new Local Plan already provides an appropriate and sufficiently flexible framework for decision-takers to consider proposals that are supported with relevant evidence. This is particularly the case in relation to the optimisation of site allocations through master planning and design-led approaches – across all possible appropriate uses for the site. This is inclusive of proposals that seek to optimise vertical intensity – and demonstrate it can be accommodated without harm.</p> <p>The Council neither considers it necessary nor sound to amend the new Local Plan to accord with a particular landowner's current aspirations – in the absence of greater certainty of delivery. In such circumstances it remains appropriate that the new Local Plan provides a flexible framework for decision-takers to make judgements based on the evidence placed before them for consideration. The Council considers that the new Local Plan provides such a framework.</p> <p>Nevertheless, the Council remains committed to working positively in partnership with Landsec as they prepare a proposal that can be assessed through the decision-taking process.</p>	

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							<p>assessment included its landholdings in Lewisham and included a feasibility study to rethink the future of the 45-year-old shopping centre. Landsec engaged various stakeholders who responded with an overriding desire for change. Almost 70% of respondents supported Landsec's vision to deliver a visionary town centre regeneration programme focused around transforming an outdated shopping centre into an integrated and connected thriving modern metropolitan centre that will be a source of local identity, pride and economic opportunity for Lewisham. Overall, the community wanted a cleaner, safer town centre with a redesigned shopping centre, and more pedestrian areas with a greater mix of uses including those that would support a night-time economy. Lewisham Council and the Greater London Authority both agreed that the comprehensive redevelopment of the shopping centre and adjacent land will be central to achieving the vision and objectives for Lewisham town centre.</p> <p>1.9 Reinvention will not detract from Landsec's ambition to secure a vibrant and vital future for Lewisham, it is simply that this ambition will have to be achieved in a new and innovative way, supported by a flexible development plan. A new vision is required which seeks to balance several strategic planning issues which we comment on in these representations. These are long term vacant floorspace; demand for new commercial floorspace; economic regeneration; development economics and scheme delivery; tall buildings; housing including affordable housing.</p> <p>Landsec Vision</p> <p>1.10 Landsec's Vision is the sustainable and mixed-use transformation of Site Allocation 2 to reintegrate the place within its surrounding fabric, weaving the old and the new to create a layered living neighbourhood above a vibrant and high performing commercial hub. To secure Lewisham's future, healthy living and flexible working will come together around a diverse leisure and retail offer that caters to all. New connecting opportunities will enable the site to open and bring nature in. The place-shaping process will be inclusive and informed by public engagement to build upon what already makes the place special, and ensure the place grows organically over time.</p> <p>1.11 Landsec's vision is based upon the foundations set by Lewisham Council, national planning and the London Plan which support adaptation and diversification of town</p>		

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							<p>centres to respond to the anticipated needs. By taking a positive approach to growth, management and adaptation town centres are expected to grow and diversify in a way that can respond to rapid changes in retail and leisure needs allowing a suitable mix of uses including housing. It is recognised that residential development plays an important role in ensuring the vitality and viability of our town centres.</p> <p>Existing Policy</p> <p>1.12 National policy and the London Plan establish the policy framework for town centre diversification to meet the changing face of retail, the recognition that new homes contribute to town centre vitality and viability and the important role that the evening economy has in retaining expenditure and providing entertainment and leisure services. We set this out in detail at Appendix 2.</p> <p>1.13 The London Plan allocates New Cross/ Lewisham/ Catford as an opportunity area for 13,500 homes and 4,000 jobs. It recognises that Lewisham will grow in function and population and has the potential to become a town centre of Metropolitan importance. Public realm and environmental enhancements of the town centre are proposed to assist the continued transformation of Lewisham into a ‘high performing’ and ‘vibrant’ retail hub with excellent leisure services.</p> <p>1.14 The adopted Lewisham Local Plan (2014) recognises that Lewisham Shopping Centre will be ‘redeveloped over time’. It promotes redevelopment of the Leisure Box and Riverdale Hall for commercial uses at ground floor and residential above and supports residential conversion of the Citibank Tower (Lewisham House). It also allocates comprehensive redevelopment of the Beatties Building and model market to provide retail/restaurants on the ground floor with commercial or residential uses on the upper floors.</p> <p>Lewisham Regulation 18 Policy</p> <p>1.15 The Council’s early review (Regulation 18) into the local plan (the “Reg 18 Plan”) promotes wholesale redevelopment of the shopping centre and adjacent land, known as Site Allocation 2. The Reg 18 Plan allocation included an indicative capacity for 1,579 homes, and 80,388m² of commercial floorspace (20,097m² employment and 60,291m² main town centre) based upon a generic density matrix which was appropriate at that</p>		

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							<p>time, prior to detailed pre-application discussions or an assessment of town centre needs. Landsec submitted representations evidencing that housing capacity should increase to c.2,500 homes and commercial floorspace should be reduced by c.50% to reflect current occupancy levels and future retail needs.</p> <p>1.16 Positively, the Council recognised that applying prescriptive definitions of maximum and minimum quanta of defined uses was not something that would be helpful to impose, and that the indicative capacities set out in Site Allocation 2 should be considered as starting points in terms of the broad quantum of development. The Council would not seek to apply these prescriptively.</p> <p>1.17 We welcome this flexible approach and consider that the Reg 19 Plan Site 2 Allocation indicative site capacities should be updated to reflect Landsec's proposals and the site-specific analysis that has been undertaken.</p> <p>Town Centre Uses</p> <p>1.18 The performance and retail vibrancy of Lewisham is not reliant on more retail floorspace. In fact, the opposite is likely to be true. Since 2009, the Council's evidence base has identified a decline in retail floorspace needs in Lewisham Town Centre. Despite originally forecasting a market share increase to support 40,000 sqm of additional retail floorspace to achieve Metropolitan status, this level of growth has fallen away and there is now an oversupply of retail floorspace in Lewisham.</p> <p>1.19 We consider the role and function of Lewisham Town Centre and the physical characteristics of Lewisham Shopping Centre in detail at Appendix 3.</p> <p>1.20 Whilst the Council's retail update was published to inform the Reg 18 Plan, it did not consider the fundamental shift in retailing that has taken place in recent years. It relies on expenditure estimates and forecasts published before the pandemic (2018), and derives population estimates from 2015. The assessment is also underpinned by a household survey undertaken in September 2015. Owing to the date of this information, the retail evidence informing the Local Plan does not yet provide an up-to-date basis for assessing future retail and leisure needs for Lewisham town centre. The assumptions relating to special forms of trading (internet shopping);</p>		

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							<p>growth rates; shopping patterns within and outside the borough haven't yet been updated.</p> <p>1.21 Landsec has commissioned, using a methodology agreed with the LPA and their specialist advisors, a new household study and has applied the latest industry forecasts on special forms of trading (internet shopping); growth rates; shopping patterns within and outside the borough.</p> <p>1.22 To supplement these findings and to better understand the trading performance of existing facilities and shopping patterns, Landsec commissioned CACI Limited ('CACI'). This additional analysis is extremely useful, and in our view provides an accurate additional layer of evidence to help better understand shopping patterns. It also allows us to sensitivity test the outcomes of the household survey as CACI data includes actual store turnover. The CACI analysis is derived from actual debit and credit card transaction data, which will recognise that shoppers use multiple destinations and that a transaction value differs on a store and location basis.</p> <p>1.23 The effect of applying the latest data substantially reduces the available retail expenditure and identifies that there is a significant oversupply of existing retail floorspace. Lewisham's market share has not increased as expected, and the town centre's penetration draws principally from a localised catchment. Online shopping has increased significantly, well beyond the Council's forecasts of 3.8% and 16.8% applied by the evidence base supporting the Reg 19 Plan. The latest published figures identify that online market share has increased to 5.4% and 25.6% respectively for convenience and comparison goods.</p> <p>1.24 Another indicator is vacant floorspace. A conservative estimate suggests that combined with oversupply, this equates to between c.17,000sqm1 to 31,000sqm2 of floorspace within Lewisham Town Centre much of which is upper floor areas. In comparing the retail evidence prepared between 2009 and 2023, the capacity for Lewisham town centre is identified to have reduced by more than £193 million. This represents a substantial quantum, and it is within this context that the Reg 19 Plan policies must be updated, and appropriate flexibility applied.</p>		

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							<p>1.25 We do not therefore consider that Site Allocation 2 should promote a near like for like retention of commercial floorspace (80,388m²) as this is not supported by Landsec's or the Council's evidence base. In our opinion, the commercial site capacity for Site Allocation 2, in policy terms, should reflect the existing occupied floorspace. This would equate to c.40,000m² of new town centre floorspace.</p> <p>1.26 A reduction in existing floorspace would not have a negative effect on the town centre, as much of this floorspace is already vacant, serving no economic function, and detracting from the vitality and viability of Lewisham. The provision of new floorspace in comparison does represent an excellent opportunity for the Council, and residents of Lewisham. The need for retail floorspace consolidation and the Council's objective for potential Metropolitan status are not mutually exclusive objectives. The London Plan recognises, in the case of Lewisham, that its potential relates to the further growth supported by the arrival of the Bakerloo line at Lewisham Interchange (although not reliant on it and in the event that the Bakerloo line happens, this would not create a demand for additional floorspace.); enhanced access to central London; encouraging the delivery of employment, leisure, service and community uses that serve the local and sub-regional population; public realm and environmental enhancements; and the continued transformation of Lewisham into a 'high performing' and 'vibrant' retail hub; with excellent leisure services. It is the performance of the retail floorspace and its vibrancy that defines its potential re-classification, not its quantum, and there is no reason why Lewisham cannot become a high performing and vibrant retail hub through redevelopment and floorspace consolidation.</p> <p>1.27 Lewisham Shopping Centre comprises an outdated retail model which does not serve the town centre as well as it could principally through a lack of permeability, poor environment, limited mix of uses, lack of afterhours footfall and a number of big box retailers which traditionally rely on car borne trips. With the removal of car parking from the development in line with London Plan and emerging policy, large box retailers will have to adapt. Our analysis demonstrates that retailers such as Primark, H&M and TK Max operate from smaller stores in higher order town centres which offers the prospect of Lewisham attracting more national retailers to smaller floorplates</p>		

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							<p>alongside increased opportunities for independents. This can result in improvements to employment density ratios as well as increased sales densities reducing the prospects of long term vacancies. Smaller optimised retail units, which are less reliant on a handful of national retailers, represent a more sustainable retail offer for the future. Our analysis shows that the most successful major town centres contain an above average number of independent retailers. Lewisham can become a high performing and vibrant retail hub with this approach.</p> <p>1.28 It is also possible to maintain and enhance employment numbers and increase footfall through intensification and a mix of uses and the contribution of the missing offer of a night time economy. Catford, for example, scores higher than Lewisham for its night time economy.</p> <p>1.29 To complement greater employment densities, skills and training initiatives can be delivered both for retail and other professional jobs. New homes (including affordable homes) will generate increased council tax and new homes bonus and local spending. Indirect jobs and residential spending will contribute to vibrancy of the town centre and employment benefits will be complemented by end use employment and gross value add.</p> <p>1.30 The outcomes that are secured through investment in a town centre such as jobs, homes, businesses, health and wellbeing, safety, permeability, beautiful buildings, carbon reduction, accessibility, culture and urban greening can become the new ingredients for success and ambition of potential Metropolitan status. The future of Site Allocation 2 is clearly a catalyst to achieving these outcomes as the largest most central site in Lewisham, and these improvements can only take place with physical rationalisation of the existing commercial floorspace.</p> <p>Residential Floorspace</p> <p>1.31 It is agreed that residential floorspace will comprise an integral component of Site Allocation 2, and national, regional and local planning policy recognises the contribution that town centre housing will make to the vitality and viability of Lewisham.</p> <p>1.32 Site Allocation 2 seeks the delivery of at least 1,579 homes. Numerically, we consider that this comprises an underutilisation of this central town centre site. 1,579</p>		

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							<p>homes would result in a density of 247 dwellings per hectare, significantly below the previous London Plan density matrix of 405 dwellings per hectare for such sites, which itself was routinely exceed. This density would also be substantially below (c.40%) the prevailing densities approved in Lewisham town centre over recent years.</p> <p>1.33 Due to the greater level of policy ambition to optimise accessible brownfield sites, housing need, and Site Allocation 2 representing the largest and most accessible town centre site for the Council, it would not represent a good use of land to promote residential densities substantially below the prevailing new build character. Landsec has provided studies which we believe demonstrate that through specific site analysis that the capacity of Site Allocation 2 can deliver at least 2,500 new homes.</p> <p>1.34 This approach would help the Council to meet its minimum housing requirements. Lewisham is widely acknowledged as a borough that takes its housing requirements seriously, but despite this, delivery remains below actual housing need within the borough.</p> <p>1.35 The Reg 19 Plan plans to make up for previous shortfalls in housing delivery which equates to 462 dwellings per annum3 (“dpa”) in addition to a 5% buffer for continued undersupply of 83 dpa. In addition, it seeks to meet the London Plan requirement which equate to 1,667 dpa. It is widely acknowledged that the London plan target falls short of the actual housing needs of London. This is evidenced by the application of the Government’s standard methodology assessment which equates to a Lewisham housing requirement of 3,151 dpa, more than double the local plan target. Set in the context of past delivery, this is a significant target. Only 599 homes were delivered in 2021-22 and 181 in 2020-20214. The ten-year delivery average, in a successful borough of growth, has only been 1,317 dpa. There is a clear need to optimise housing delivery on the most sustainable and accessible sites.</p> <p>1.36 Residential development also performs an integral role for the development economics of a proposal. Unlike other proposals which are subject to cleared, or low intensity land uses, Site Allocation 2 is an extremely complex site as we discuss below.</p>		

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							<p>Viability of Delivery</p> <p>1.37 There are numerous existing commercial rights which have been acquired across the site over recent years; 3rd party interests; legal interests across multiple levels; and physical overlays of different buildings with different land interests and structural grids. These existing constraints represent significant abnormal costs⁵. Further abnormal costs are associated with the phased nature of delivery, a strategy necessary to avoid extensive wholesale demolition which could adversely impact town centre vitality and viability. The scheme must also deliver appropriate social and physical infrastructure to serve its residents and the wider community. Whilst a complex issue, abnormal costs do represent a fundamental part of the planning narrative.</p> <p>1.38 We have reviewed the Council's evidence base in respect of viability as prepared by BNPP. It is straightforward to adapt this work in order to test alternative development scenarios, and we have done so below in order to assist the Council in understanding the specific issues with comprehensive regeneration in Lewisham town centre.</p> <p>1.39 The BNPP study tests development across the 6.37ha site (referred to as site 46 Lewisham Shopping Centre) assuming a site capacity of 1,186 homes and 83,003m² of commercial floorspace. Prior to any allowance for site exceptional / abnormal costs, the BNPP study concludes that the Lewisham Shopping Centre site is capable of delivering 0% affordable homes at £6,500/m², just below the current average sales value. Where the study tests greater residential sales values, affordable housing theoretically can be delivered but only on the assumption that there are £0 abnormal costs, which of course is not the case.</p> <p>1.40 It is understandable that the Council's consultants did not include exceptional costs as this information was not available to them (and the BNPP report acknowledges it is seeking to set a consistent baseline for all sites, prior to allowance for these site-specific costs). However, the Council's own evidence suggests that an allocation of 1,579 homes will prevent any meaningful affordable housing and may risk delivery of the site.</p> <p>Design Led Optimisation</p>		

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							<p>1.41 Through the pre-application engagement work that Landsec has undertaken with the Council, GLA and local community, the following evidence-based principles have been derived to guide the redevelopment of the shopping centre:</p> <p>Re-establish the framework – introduce key connections reflecting how Lewisham is navigated today.</p> <ul style="list-style-type: none"> ▪ Rooting the place – promoting Lewisham’s built and social heritage. ▪ Amplify the town centre – create a thriving new Metropolitan Town Centre, inclusive and accessible to all. ▪ Growing a destination – concentrating public space to create an accessible safe and unified location for Lewisham. <p>1.42 A design led optimised approach by Studio Egret West demonstrates that tall buildings are a necessary and important typology to deliver the planning objectives at this site. Whilst tall buildings are considered appropriate in this location under existing and emerging planning policy, they are also necessary as a design and delivery tool to break open the inward facing shopping centre and create new open space, permeable routes, active frontages and a package of public benefits. They are an inevitable consequence of a new mixed use town centre model.</p> <p>1.43 Positively, with a rational approach to townscape and heritage, tall buildings can contribute to the role and function of Lewisham and the potential Metropolitan classification of the town centre. Tall building typologies, up to 35 storeys, have already been proposed to the north of Lewisham town centre, redeveloping large retail warehouse floorplates and infrastructure sites.</p> <p>1.44 However, the historic heart of Lewisham is the linear high street and market, with Lewisham shopping centre located behind this to the west. Whilst the high street is historic, it is not a designated heritage asset, which might otherwise present a limitation on optimisation. The rebalancing of the town centre height hierarchy to its geographical core is important for its health, vitality and viability. Site Allocation 2 is fundamental to this. There is a genuine transformative opportunity to connect the northern and southern tips of the town centre (a 2014 policy objective), connections east and west, and a critical mass of development within the core to draw Lewisham</p>		

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							<p>towards its town centre reclassification. Importantly, it can achieve this largely through single ownership enabling a comprehensive approach in phases to maintain operational continuity of trade and limiting disruption to the rest of the town centre.</p> <p>1.45 Tall buildings, alongside some linear blocks, are proposed to be the principal building typology at Site Allocation 2 to enable phased delivery, continuity of trade, improved residential amenity and deliver new public realm. Site Allocation 2 affords the opportunity to place the greatest emphasis in the area that has the greatest significance to the function of the town, and we consider that proposed maximum heights should be subject to site specific analysis which is likely to only be available at the planning application stage.</p> <p>1.46 It is our opinion that an indicative maximum height threshold of 30 storeys is appropriate for Site Allocation 2 and should be reflected in Figure 5.5 of the Reg 19 Plan and at Schedule 12 (Tall Building Suitability Zones). We do consider that from our own analysis of townscape, heritage, microclimate and regeneration needs that tall buildings of 35 storeys can be successfully accommodated within the allocation at specific, and limited, locations.</p> <p>Community Engagement</p> <p>1.47 Many of the planning objectives set out in the adopted and emerging development plan have been reflected in the consultation exercises undertaken by Landsec. There is an overriding desire for change. People want a cleaner, safer town centre, redesigned shopping centre, and more pedestrian areas. More independent retailers, cafes & restaurants are sought and whilst Lewisham market is popular, there are strong views about the way it is managed and the negative effects it has on the public realm.</p> <p>1.48 Landsec's community engagement has been extensive. It has undertaken programmes of consultation and engagement including public exhibitions in 2021 and 2022 and has engaged many local stakeholders.</p> <p>1.49 Landsec undertook a listening exercise in 2020. This comprised an extensive consultation programme to help better understand how the local community felt about the shopping centre and wider town centre. The consultation involved a six-week consultation period; 10,000</p>		

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							<p>newsletters; contact with 115 community groups and organisations; a consultation website; Facebook advertising to promote the consultation process; two virtual village halls; and street canvassing. Landsec received an excellent response with 2,231 website visits; 732 consultation responses of which 25% responses were from BAME other ethnic groups.</p> <p>1.50 A summary of what people told Landsec is set out below.</p> <ul style="list-style-type: none"> ▪ 60% visited the town centre once a week or less. ▪ Change is wanted: people want a cleaner, safer town centre, redesigned shopping centre, and more pedestrian areas. ▪ More independent retailers, cafes & restaurants are sought. ▪ Lewisham market is popular, but there are strong views about the way it is managed. ▪ 71% said new arts and cultural space would improve the town centre. ▪ Adding more shops ranked lowest as a positive impact. <p>1.51 The consultation identified considerable affection for Lewisham town centre but a feeling that it has become unloved. There is a strong desire for it to become a vibrant and exciting place again, with recognition for change. Lewisham Shopping Centre is key to that new start with a desire to see more in the town centre than retail, with a strong focus on cultural and other uses such as community and Food & Beverage.</p> <p>1.52 The feedback from the consultation has helped inform Landsec's thinking around the future vision for the town centre which is set out in these representations.</p> <p>1.53 Further consultation took place in November and December 2021 including a public exhibition held in Lewisham Shopping Centre. 609 people visited the exhibition and over 8,000 people visited the consultation website, with 751 respondents providing feedback to the consultation. Challenges identified around the town centre included an unappealing environment, a lack of planting and the need for a more diverse retail offering. Respondents overwhelmingly considered that Lewisham Town Centre would benefit from having a greater mix of residential, workspace, community, retail and leisure facilities. Respondents said that a wider offering in the town centre would encourage them to use the high street and market more.</p>		

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							<p>1.54 It was also considered that the town centre is seen as a place that serves functional needs, rather than an active destination point. There is a lack of civic space, and the town centre lacks accessible, well maintained and properly managed green spaces. The shopping centre acts as a barrier to movement and there is a desire for better permeability. More night-time activity is sought and Lewisham Market is an important part of life in Lewisham town centre.</p> <p>1.55 A summary of Landsec's community engagement is provided in Appendix 4. Further engagement is planned in 2023.</p>		
CON042	REP180	Quod OBO Landsec			3	LCA SA 02	<p>2 Site Allocation 2 - Lewisham Shopping Centre</p> <p>2.1 The Reg 19 Plan states (paragraph 3.23) how Part 3 includes site allocation policies to ensure that the best use of land and optimal capacity of sites is realised. Lewisham Shopping Centre is identified within Site Allocation 2 and is the largest Site Allocation, by some way, within Lewisham's Central Area.</p> <p>2.2 Within this Section, we comment specifically on the relevant parts of Site Allocation 2 as they are set out in the Reg 19 Plan and their soundness when considering the Council's evidence base.</p> <p>Site Allocation</p> <p>2.3 The allocation comprises Lewisham shopping centre, owned by Landsec, and land outside of the Shopping Centre, including Lewisham House, Lewisham High Street and Lewisham market. Site Allocation 2 (excluding the market) is allocated for comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community, and residential uses.</p> <p>2.4 Landsec support this allocation and whilst the area identified includes land in addition to Lewisham Shopping Centre, it is felt that this is a positive and necessary approach to secure a comprehensive redevelopment of this important 6.38ha town centre site.</p> <p>Indicative Development Capacity</p> <p>2.5 The indicative development capacity for the site is proposed as follows.</p> <p>Table 1: Reg 19 Plan Site Allocation 2 Indicative Capacity</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 02 Lewisham Shopping Centre.</p> <p>Specifically, the Council notes the various points made by the respondent that relate to the quantum, capacity and mix of uses proposed for the comprehensive mixed-use redevelopment of the site.</p> <p>For clarity, the Council considers that the evidence base used to inform and prepare the new Local Plan is robust and proportionate for the purposes of plan-making. The Council acknowledges that it may be technically possible to prepare more comprehensive and detailed evidence to support site allocations but that such detailed evidence may not be necessary for the plan to be sound. Within this context the Council considers it correct that the new Local Plan provides development partners and decision-takers to consider such detailed technical evidence when submitting and determining development proposals.</p> <p>The implication that the Council should have as part of the plan-making process undertaken more detailed technical evidence building to extract further potential development capacity is considered unreasonable. This would have required the Council to apply a more</p>	No further actions required in relation to the new Local Plan.

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							<p>Indicative Development Capacity/ Net residential units 1,579/ Gross non-residential floorspace Employment: 20,097 sqm Main town centre: 60,291 sqm</p> <p>2.6 The Council's Site allocation background paper (2021) confirms (page 10) that the starting point to establish indicative capacity is informed by the use of a standard methodology. This is based on the density assumptions used in the London-wide SHLAA methodology (2017). For Opportunity Areas, in Central locations with Public Transport Accessibility Levels ("PTAL") of 4 – 6 (the site's PTAL is 6b (best)) the London-wide SHLAA density assumptions are 450 dwellings per hectare ("dph").</p> <p>2.7 The Site allocation background paper then makes reference to a sensitivity analysis to assess whether the baseline capacity figure (standard methodology derived) was feasible and appropriate to the site context. It is confirmed in Table A.1 (Site development capacity) that the sensitivity analysis was not applied to Lewisham Shopping Centre.</p> <p>2.8 Table 7.1 of the background paper sets out the general assumptions for uses on mixed-use sites. For Lewisham Shopping Centre this proposes Residential – 60%; Main Town Centre – 30%; and Employment – 10%. The footnote goes onto state that this assumption reflects the need for provision of a significant amount of main town centre uses within the Primary Shopping Area, also commensurate with the objective for Lewisham to be designated a Metropolitan centre.</p> <p>2.9 Working this through, 60% of the 6.38ha Lewisham Shopping Centre site is 3.83ha, which at 450 dph would generate 1,724 residential units. This is more than the 1,579 residential units set out in the Indicative Development Capacity.</p> <p>2.10 Table A.2 Delivery assumptions (land use mix by site) then goes onto show, without explanation, the residential proportion of the land use mix for Lewisham Shopping Centre as 55%. Working this through, 55% of the 6.38ha Lewisham Shopping Centre site is 3.51ha, which at 450 dph would generate 1,579 residential units which reflects the 1,579 residential units figure set out in the Indicative Development Capacity.</p> <p>2.11 As we will go on to describe below, we consider that the standard method is too arbitrary for this complex site. It underestimates the potential for new homes on site, and by</p>	<p>detailed design-led typological assessment to more than 70 sites. Had the Council undertaken such detailed evidence building exercise it is likely that some participants would have continued to challenge the outputs suggesting that greater optimal capacities could be demonstrated (through increasingly more detailed evidence building). For this reason alone the Council maintains that the new Local Plan's approach is sound.</p> <p>For further clarity, the new Local Plan must be read and considered in its entirety. The new Local Plan site allocations identify indicative development capacities – the emphasis being upon the word "indicative". The capacity figures identified within the new Local Plan are very much a starting point on a journey to identifying and securing optimal development capacities.</p> <p>The Council highlights that this approach applies to both new residential uses, and employment and town centre uses. This is a critical consideration at this location/ place because of the aspiration, which the Council notes the respondent shares, for the Town Centre to evolve to gain Metropolitan Centre status. Equally, the Council concludes that the re-provision of Town Centre uses at this location will be an important place-shaping measures that will meet employment, retail and community needs for a growing and evolving population.</p> <p>In turn, the development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. Other policies such as Policy EC 13 Optimising the use of town</p>	

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							<p>apportioning 40% of uses to Main Town Centre and Employment uses greatly overestimates the demand for these uses and fails to recognise existing vacancy levels and the objectively assessed needs of Lewisham.</p> <p>2.12 The Council's Residential Density Technical Paper (2020) which was produced to support the sensitivity analysis described above also shows6 that the residential density of a number of approved schemes within Lewisham's Central Area (which includes the Lewisham Shopping Centre Site Allocation) are well above 450dph. They range from 480 to 670 dph and in some cases up to 1,287 dph. 450dph is considered to be a conservative figure given the centrality of the Lewisham Shopping Centre Site Allocation to the Central Area, and the size of the site to create its own urban character.</p> <p>2.13 Landsec recognised in its Reg 18 representations that the standard methodology described above can act as a starting point for site capacity. However, the final development capacity should be established through a detailed assessment of design, townscape, needs and various other planning matters subject to specific pre-application discussions.</p> <p>2.14 Indeed, the Council has used this approach to inform site capacities elsewhere in the borough.</p> <p>2.15 Landsec considers that since 2020, sufficient discussions have taken place with the Council and stakeholders to inform a site-specific approach to the indicative capacity for Site Allocation 2.</p> <p>Net Residential Homes</p> <p>2.16 As a PTAL 6 central location, the London Plan encourages much greater residential densification, certainly given the potential for metropolitan status. London Plan Policy H1 Increasing housing supply requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites in order to ensure that housing targets are met. Sites within existing or planned PTALs of 3-6 which are located within 800m of a tube or rail station or town centre boundary are identified as key sources of capacity.</p> <p><i>Contextual Density Assessment</i></p> <p>2.17 Numerically, we consider that the delivery of at least 1,579 homes referred to in the Site Allocation (a gross residential density of 247dha, the lowest of any Lewisham town centre site) comprises an underutilisation of brownfield land. This does suggest that the site allocation underutilises</p>	<p>centre land and floorspace, LCA 02 Lewisham major centre and surrounds are also relevant to this discussion.</p> <p>The Council considers that these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>The Council concludes that the new Local Plan's master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p>	

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							<p>capacity at Site 2 and further design led optimisation is required.</p> <p>2.18 This density would also be substantially below (c.40%) the prevailing densities approved in Lewisham town centre over recent years. Due to the greater level of policy ambition to optimise accessible brownfield sites, and Site Allocation 2 representing the largest and most accessible town centre site for the Council, it would not represent a good use of land to promote residential densities substantially below the prevailing character.</p> <p>2.19 Using gross densities (housing numbers and site area), we have compared Site Allocation 2; a housing proposal of 2,500 homes and 3,000 homes at Site Allocation 2 with other Lewisham town centre permissions, and the Surrey Canal (New Bermondsey) proposal which received a resolution to grant planning permission on 27/1/22.</p> <p>2.20 We have also compared the densities to the former London Plan density matrix which specifically considered appropriate residential densities for central PTAL 6 sites. This guided densities to 405 dwelling per hectare ('dph'). If this density threshold was applied to Site Allocation 2, it would generate 2,584 homes, the density that Landsec propose.</p> <p>2.21 The densities approved by Lewisham Council are generally greater than the densities proposed for Site 2 at 2,500 and 3,000 homes which would adequately support an increased housing capacity of at least 2,500 homes.</p> <p><i>Design Led Optimisation</i></p> <p>2.22 Landsec has entered into pre-application dialogue and design review with the Council, Design Review Panel and GLA regarding the design principles for the site. This has included a built heritage and townscape assessment and an assessment of public benefits; regeneration requirements; and site delivery. It is considered that following this design led approach Site Allocation 2 can deliver 2,500 new homes on site.</p> <p><i>Development Economics</i></p> <p>2.23 Residential development performs an integral role for the development economics of the proposal. Unlike other proposals which are subject to cleared, or low intensity land uses, Site Allocation 2 is an extremely complex site. There are numerous existing commercial rights which have been acquired across the site over recent years; 3rd party interests;</p>		

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							<p>legal interests across multiple levels; and physical overlays of different buildings with different land interests and structural grids. These existing constraints represent significant abnormal costs in addition to utilities reinforcements, highways works, remediation / asbestos removal, service diversions, demolition / reconfiguration of existing spaces & basements and vacant possession costs.</p> <p>2.24 Further abnormal costs are associated with the phased nature of delivery, a strategy necessary to avoid extensive wholesale demolition which could adversely impact town centre vitality and viability. Whilst a complex issue, abnormal costs do represent a fundamental part of the planning narrative. The Council's own evidence base used to inform the local plan review represents an important baseline to commence this discussion albeit the Council's consultants did not include exceptional costs as this information was not available to them (and the BNPP report acknowledges it is seeking to set a consistent baseline for all sites, prior to allowance for these site-specific costs).</p> <p>2.25 The Lewisham Shopping Centre site does however of course have substantial exceptional / abnormal costs.</p> <p>2.26 On the basis of the Council's own evidence, an allocation of 1,579 homes will prevent any meaningful affordable housing and may risk delivery of the site. A 2,500-home target whilst not achieving a policy compliant level of affordable housing, is evidenced by BNPP's work to be deliverable, once abnormal costs are taken into account and to include the substantial benefit of a meaningful level of affordable homes. This would also represent the appropriate residential density for the site both in terms of guidance and approved new build developments. Numerically it is therefore the appropriate quantum of housing for Site Allocation 2.</p> <p>2.27 Development economics is challenging and continually evolving. Since BNPP issued its evidence base, BCIS indicates a further 5% increase in build costs (representing a £50m additional cost to the scheme based on the BNPP build rates) whilst the sales market has become more challenging. Further viability pressures have arisen with the introduction of the Mayor of London's second staircase requirement and the economic climate has softened, with increased finance costs and risk.</p> <p>2.28 The infrastructure challenges of the site must therefore be recognised in the site allocation.</p>		

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							<p>Employment</p> <p>2.29 From a review of the evidence base we have not been able to locate the source of the 20,097sqm figure included within the indicative site capacity. We understand that the employment figure includes all the previous B use classes, and as a result office floorspace is removed from the 'main town centre' floorspace requirement. This does result in a degree of ambiguity as it is unclear what office floorspace capacity is expected of a site where there is no expectation for industrial floorspace, as is the case with Site Allocation 2.</p> <p>2.30 However, the figure does not appear to be supported by the evidence based on:</p> <ul style="list-style-type: none"> ▪ The 2017 London Office Policy Review included a "composite" projection for the borough, that suggested office floorspace falling by 2,500sqm from 2016-2041. Lewisham centre was categorised as "B", suggesting some new office provision but likely to entail overall net loss of office stock. Table A1.1 of the London Plan (2021) categorises the 'Office Guidelines' for Lewisham as 'C' which relates to protecting small office capacity. <p>The Council's 2018 Local Economic Assessment says "Demand for office space in Lewisham is low and is focussed on small spaces (below 5,000 sq ft)", and "not typically considered an office location" (page 46).</p> <ul style="list-style-type: none"> ▪ The Council's 2019 Employment Land Study says "demand for office space in Lewisham is relatively weak" (page 25). It notes the trend to concentrate office employment in the CAZ has led to falls in office stock in Lewisham even as the number of residents employed in "office sectors" has increased. It concludes that only 15,000sqm net of additional office stock was needed in total for the whole borough over the period 2018-2038 (para. 6.39). <i>[our underlining]</i> ▪ The evidence base does not take into account the recent changes in the nature of employment space brought about by the shift to hybrid, remote and home working, nor the change in Use Classes Order, and the creation of more flexible E-class. ▪ We note that Lewisham House, a 12,000sqm office building within Site Allocation 2 has remained vacant for a number of years, and has been subject to four office to dwellinghouse prior approval consents between 2015 and 2021. 		

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							<p>2.31 In our opinion it would also be more appropriate to include any requirement for office floorspace within the main town centre capacity to avoid ambiguity within the local plan. It is common ground with the Council there is no requirement for industrial uses within Site Allocation 2.</p> <p>Main Town Centre Uses</p> <p>2.32 In terms of the suggested capacity for main town centre uses (identified to be 60,291 sqm), it is not clear where this figure has been derived. This figure does not appear to be reflective of an evidence base. The Lewisham Retail Impact Assessment and Town Centres Report (dated December 2021) ("RIATCTR") did not assess capacity of individual sites.</p> <p>2.33 When considering the development capacity of a site, it is important to consider the following:</p> <ul style="list-style-type: none"> ▪ Existing use of the site; ▪ Future demand / capacity; and ▪ Place-making and design considerations. <p>2.34 All these factors will impact on the development capacity of a site. However, it appears that none have yet been assessed by the Council in identifying an indicative main town centre uses figure for the site allocation.</p> <p>2.35 Many of the upper floors (including within the existing retail units) within the shopping centre are not being used or are vacant. This suggests that existing retail units are oversized. For example, M&S and H&M, both of which are located within the Site Allocation, are not utilising their upper floors. This is supported by the CACI and sales density sensitivity assessment. 2.36 In terms of future capacity, the updated evidence published by the Council (RIATCTR) identifies an oversupply of comparison retail floorspace (which will be the focus for growth of higher order centres) by 2035. This represents a notable shift in the findings of the retail evidence informing the earlier Regulation 18 Local Plan. Despite this, the indicative development capacity for the site (at 60,291 sqm) remains identical with that identified in the Regulation 18 Local Plan. The adoption of the same floorspace figure further indicates that this has not been based on any evidence and has not been re-considered by the Council as a result in of the falling demand for new retail floorspace in Lewisham – as acknowledged by the RIATCTR.</p>		

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							<p>2.37 The Council's updated retail evidence demonstrates that the identified oversupply of retail floorspace in Lewisham town centre has increased. Our assessment identifies that within Lewisham town centre there is an oversupply of retail floorspace due to retail capacity and vacancy of c. 17,000 sqm (gross) at 2025, and this is likely to be an underestimate.</p> <p>2.38 The retraction in the retail market (as acknowledged by the Council's own retail evidence) has implications on the future capacity for the site allocation. By overstating the development capacity this has the potential of undermining the long-term vitality and viability of the town centre, by creating vacant floorspace where demand does not exist, and on the overall delivery of the site.</p> <p>2.39 Finally, when considering future development capacity, consideration must be given to placemaking and design issues. The existing site comprises built floorspace across most of the allocation giving rise to limited opportunities for permeability and public realm. Consequently, if the wider design aspirations for the site are to be achieved, which includes the reconfiguration of spaces to facilitate a street-based layout with improved permeability with the wider town centre, new and improved public realm it will not be physically possible to provide the same commercial footprint as currently provided as part of redevelopment proposals of the site.</p> <p>2.40 Given this, together with the fact that retail and a number of other main town centre uses do not typically wish to be located on upper floors, the wider design objectives will naturally impact upon the site capacity, despite Landsec seeking to ensure that commercial floorspace is maximised across the whole ground and part upper floors.</p> <p>2.41 Having regard to the above, the indicative capacity figure to provide 60,291 sqm of floorspace for main town centre uses within the site allocation is not justified or compatible with the wider redevelopment aspirations for the site.</p> <p>2.42 Instead, by taking into account all the above factors, we believe that the indicative capacity for main town centre uses should be reduced to c. 40,000 sqm. This represents capacity that is still in excess of the evidence base and is ambitious but could be deliverable and achievable and importantly will realise the wider regeneration benefits associated with the comprehensive redevelopment of Lewisham Shopping Centre.</p>		

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							<p>2.43 Submitted under separate cover, Landsec has prepared an updated technical assessment which applies the latest industry forecasts to the Council's retail model to help inform future needs for the town centre.</p> <p>Proposed Modification 2.44 The proposed modification to indicative site capacity of Site Allocation 2 is set out at Table 5 below. It seeks an increase in living units of 2,500 homes. It also seeks to remove the employment reference due to ambiguity and revised the indicative capacity to 40,000sqm.</p> <p>Table 5: Indicative Capacity Proposed Modification Indicative Development Capacity Net residential units 1,579 2,500 Gross non-residential floorspace Employment 20,097 and Main town centre 60,291 40,000</p> <p>Site allocation 2.45 The site allocation is supported by Landsec, albeit we consider that reference to student accommodation should be included as follows.</p> <p><i>Comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community, student and residential uses. Redevelopment of existing buildings and reconfiguration of spaces to facilitate a street-based layout with new and improved routes, both into and through the site, along with public realm and environmental enhancements.</i></p> <p>Opportunities 2.46 Due to the complexities of bringing Site Allocation 2 forward, it is considered necessary to include the following text within the opportunities section of the allocation. We consider that there should be explicit recognition and acknowledgement that policy priorities will need to be balanced to achieve the strategic aims of this town centre regeneration allocation.</p> <p><i>The site is by its nature complex to bring forward and requires significant upfront investment in infrastructure which may impact the viability of development and the ability to achieve other policies of the plan. The Council will take into</i></p>		

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							<p><i>consideration the viability challenges of the site when assessing the requirements of other policies.</i></p> <p>Development Guidelines</p> <p>2.47 We note there are cross references within the site allocation text to other policies within the Reg 19 Plan. The last sentence of Development Guideline 7 states as follows:</p> <p><i>“Tall buildings may be are appropriate across the site, especially at the northern end of the site and to the west along Molesworth Street.” [our underlining]</i></p> <p>2.48 We do not consider that the underlined text reflects policy QD4 (Building heights) which identifies that the site is located within a Tall Building Suitability Zone, where tall buildings are appropriate (Part B of the policy). For consistency with policy QD4, the Development Guideline text should be amended as follows:</p> <p><i>“Tall buildings may be are appropriate across the site, especially at the northern end of the site and to the west along Molesworth Street.” [our underlining]</i></p> <p>The final development guideline refers to options for plots of land that do not fall within the ownership of Lewisham Shopping Centre. We comment in Section 11 below on policy DM4 (Land Assembly). To align the development guideline with policy DM4, we consider the following amendments are required:</p> <p><i>“Redevelopment options for the plots of land that do not fall within the ownership of the Lewisham Shopping Centre should be explored, to better integrate them into fully co-ordinated with a comprehensive scheme for approach to the wider site allocation. This includes retail units along Lewisham High Street, and the Lewisham House block where the principle of land use has already been established through the prior approval process.”</i></p>		
CON042	REP181	Quod OBO Landsec			2	QD 04	<p>3 Chapter 5 - High Quality Design</p> <p>3.1 To remain in general conformity with the London Plan (LP Policy D9), Lewisham Council has prepared its evidence base to support the location of tall buildings in the borough. LP Policy D9 requires ‘appropriate’ tall building heights to be identified on maps. Paragraph 3.9.2 of the London Plan suggests that boroughs should determine the maximum heights that could be acceptable, however it is widely recognised across many London borough local plan reviews that it is simply impossible for a Council to prescribe rigid maximum building heights with</p>	The Council notes the comments made in relation to the new Local Plan Policy QD 04 Building Heights. The Council highlights that the respondent’s specific objective is to secure, through planning policy, a higher vertical intensity and consequential development quantum for nascent proposals for their development site (Lewisham Shopping Centre – Policy LCA SA 02).	No further actions required in relation to the new Local Plan.

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							<p>any degree of accuracy. This is because Councils do not have the capability or evidence base to undertake detailed site-specific design, townscape and heritage assessments and are unable to take into account all of the planning judgements required to inform maximum building heights (outside of the planning application process). It is therefore necessary to ensure flexibility within the plan.</p> <p>3.2 Landsec supports the Council's recognition that development proposals may come forward for building heights above the indicative maximums, and where building heights depart from the parameters set by the Local Plan they will be considered having regard to relevant material considerations. In such circumstances a wider public benefit must be demonstrated to justify the design of the development⁷.</p> <p>Draft Policy QD4 Building Heights</p> <p>3.3 The Reg 19 tall building policy (QD4) proposes a significant change to the Reg 18 Plan. It moves away from a 'Tall Buildings suitability plan' (which identified at a borough wide level those areas that were 'less suitable' to 'more suitable' for tall buildings), to a 'Tall Building Suitability Zone' which specifies the location and maximum storey height for each zone.</p> <p>3.4 As explained in Landsec's representations on the Regulation 18 Plan consultation, Lewisham Shopping Centre performs excellently when considered against the criteria set out in the Council's Tall Buildings Study (2021) for determining the appropriate scale and location of tall building in Lewisham:</p> <ul style="list-style-type: none"> ▪ High PTAL – PTAL 6; ▪ Proximity to Bakerloo Line Extension – Adjacent to transport cluster; ▪ Town Centre location – Located in a major town centre and potential for Metropolitan town centre classification; ▪ Opportunity area location – Located in an Opportunity area; ▪ Growth area location – Located in a Growth area; <p>Characterised by building height and tall building clusters – Located in an existing tall building cluster;</p> <ul style="list-style-type: none"> ▪ Proximity to Green and Open Space – Close to Green/Open Space; ▪ Good Cycling Transport Accessibility Level – Benefits from a reasonable level of accessibility to railway and London Underground stations by cycling; ▪ Site allocation – It is an allocated site; ▪ Outside a World Heritage Sites and Buffer Zone – Located outside World Heritage Site and Buffer Zone; 	<p>For clarity, the Council considers that the new Local Plan's approach in relation to building height is consistent and is in general conformity with the London Plan. It is noted that the Greater London Authority has not raised this matter as an issue of general conformity. The London Plan remains part of Lewisham's Development Plan.</p> <p>The Council considers that the policy is justified – it is based on robust and proportionate evidence, which identifies locations that are suitable and have the capacity for accommodating taller buildings. It is noted that the respondent (elsewhere) welcomes the inclusion of their site within a zone identified as more suitable for taller buildings.</p> <p>The suggestion that the quantification of building heights in metres be deleted from the policy is noted and discounted as itself being unsound. The Council highlights that the London Plan (under Policy D9 Paragraph 3.9.2) places a requirement upon plan-making authorities to identify maximum building heights, which is what the Council has sought to do. It is entirely logical that when identify maximum building heights the new Local Plan does so by using a known and understood quantifier/ metric. Careful reading of the policy wording, specifically the use of the words "not normally", reveals that there is flexibility to consider proposals that may be at precise variance from the identified heights. Again, the new Local Plan provides decision-takers with the opportunity to consider technical evidence – brought through the master planning and design-led approaches.</p> <p>For clarity, the Council highlights that the new Local Plan must be read and considered in its entirety. The new Local Plan site allocations identify indicative</p>	

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							<p>▪ Outside a Conservation Area – Located outside a Conservation Area;</p> <p>▪ Outside an Area of Special Local Character – Located outside an Area of Special Local Character;</p> <p>▪ Listed Buildings – Does not contain any listed buildings;</p> <p>▪ LVMF viewing corridor and consultation areas – Outside the LVMF viewing corridor and consultation areas;</p> <p>▪ Local landmarks and local view buffers – Outside the local landmarks, local views and local view buffer;</p> <p>▪ Varied Surrounding Building Heights – Lewisham has one of the widest spectrums of building heights; and</p> <p>▪ Lower ground (topography) – The site is located on areas of lower ground therefore is less sensitive to the impacts of tall building proposals</p> <p>3.5 It is therefore common ground that Site Allocation 2, and specifically Lewisham Shopping Centre is a suitable location for tall buildings. Landsec are concerned however that the Plan does not yet accurately reflect the High Court judgement on LP Policy D9 (part B of QD4); fails to accurately reflect the correct floor to floor heights of town centre developments (part C of QD4); and does not reflect national policy on heritage assets (part D of QD4). We are also concerned that the proposed maximum heights for Site Allocation 2 (Figure 5.5 and Schedule 12) do not represent the opportunity for building heights presented in detailed pre-application discussions and the Council’s own evidence base.</p> <p>3.6 We comment on these matters further below.</p> <p>Part B</p> <p>3.7 To align Policy QD4 (Building heights) with London Plan policy D9 (Tall buildings) and its application⁸, which does not preclude tall buildings coming forward outside of identified tall building locations, Part B should be amended so that it is consistent with regional policy and therefore sound as follows:</p> <p><i>“Tall buildings should only be developed in locations identified as appropriate for tall buildings on the Policies Map (i.e. Tall Building Suitability Zones). Development proposals for tall buildings outside of these zones will be resisted, except where the development is adjudged to be acceptable having regard to any adverse visual, functional, environmental and cumulative impacts in accordance with London Plan policy D9(c).”</i></p> <p>3.8 As the Reg 19 Plan wording currently stands, there is also a contradiction between Parts B and D of policy QD4. Part D of policy QD4 states that development proposals for tall buildings</p>	<p>development capacities – the emphasis being upon the word “indicative”. The capacity figures identified within the new Local Plan are very much a starting point on a journey to identifying and securing optimal development capacities.</p> <p>In turn, the development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>The Council concludes that the new Local Plan’s master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p> <p>For clarity, the Council highlights that the new Local Plan is seeking to exceed the housing needs (starting position) identified through the London Plan.</p>	

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							<p>will only be permitted where they are in a Tall Building Suitability Zone.</p> <p>3.9 To align Parts B and D of policy QD4, Part D should be amended as follows:</p> <p><i>“Development proposals for tall buildings will only be permitted should normally be developed where they are in a Tall Building Suitability Zone, align with the appropriate height ranges set out above and it is demonstrated that the development:”</i></p> <p>Part C</p> <p>3.10 Part C of QD4 includes maximum building heights in metres and in storeys. The maximum building heights, for example for Lewisham Town Centre 52m to 112.8m, have been derived from the Council’s evidence base, the Allies and Morrison Tall Building Addendum May 2022.</p> <p>3.11 This assumes⁹ that typical heights of ground floors will be 4 metres and heights of upper floors will be 3.2 metres. Landsec’s design team have been working on design proposals for the town centre and this analysis, and the contextual analysis of other town centres, indicates that ground floor heights will be greater than 4m, and 5.8m is normally proposed to deliver high quality retail space, the requirement of retailers, back of house and servicing requirements. Similarly, residential upper floors are 3.25m and plant 4.5m to allow for brick construction, approved document L (conservation of fuel and power), O (overheating) compliance and energy strategies. This results in less floors being delivered as a result of the metric threshold in part C which would in turn impact deliverability. As the evidence base only uses “typical” floor storey heights we suggest that the heights in metres be removed from QD4, particularly as these are not carried through into Figure 5.5 or Schedule 12.</p> <p>3.12 Text should be added to the end of Part C of policy QD4 as follows:</p> <p><i>“Where proposals for tall buildings exceed the height criteria set out above, they will only be permitted where the development is adjudged to be acceptable having regard to any adverse visual, functional, environmental and cumulative impacts in accordance with London Plan policy D9(c).”</i></p> <p>Figure 5.5 and Schedule 12 (Tall Building Suitability Zones)</p>		

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							<p>3.13 Despite the assessment undertaken by the Council regarding the exceptional suitability of Site Allocation 2 for tall buildings, we note that the maximum storey height identified is 25 storeys (Figure 5.5 and Schedule 12).</p> <p>3.14 This is despite the Council recognising that the site forms the heart of Lewisham major centre (Reg 19 Plan para. 14.28), and that Lewisham Gateway (directly opposite the shopping centre to the north) is identified for 35 storeys. Parts of North Deptford, which are less suitable using the Council's criteria-based assessment include zones of 35, 45 and 48 storeys and parts of Deptford Creekside which has a zone of 30 storeys.</p> <p>3.15 The Council's 'Tall Buildings Study Addendum (May 2022)' introduced maximum building heights for different areas of the borough. Landsec submitted representations to this document on 9th June 2022. Having regard to the analysis undertaken in Figures 50 – 57 of the Tall Buildings Study Addendum which consider matters such as accessibility, town Centre/ opportunity area location and combined suitability, we consider that there is nothing to distinguish why the Lewisham Shopping Centre site should have a maximum height parameter (25 storeys as identified in 'Zone B') that is materially less than the northern part of the town Centre (35 storeys as identified in 'Zone A'). Figure 59 of the Addendum shows a level of sensitivity on some parts of Lewisham High Street, however this is accounted for in the Addendum by removing the High Street from the area where tall buildings may be appropriate, and this is reflected in Figure 5.5.</p> <p>3.16 Whilst we acknowledge the transitional role that Lewisham Shopping Centre is envisaged to play, the Lewisham Shopping Centre Site Allocation text (Development Guideline 7) only applies this directly to the southern end of the site. The Council's 'Tall Building Review Background Paper – January 2023' also refers to the site performing a transitional role (page 12):</p> <p><i>"Deep site with constraints arising from existing structure. The site has to form a transition between the northern cluster of tall buildings focused around the station to the existing low rise context of the high street. Could support a cluster of towers up to max.25 storeys focused towards Molesworth Street and to the north of the site."</i></p> <p>3.17 However, we would disagree that a reduction from 35 storeys on the Lewisham Gateway site, as shown on Figure 5.5 of the Reg 19 Plan, to 25 storeys across the road on the</p>		

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							<p>Lewisham Shopping Centre site would form the basis of a successful transition. We also note that paragraph 4.33 of the Tall Building Review Background Paper draws from the Reg 19 Plan when stating:</p> <p><i>“There are significant site redevelopment opportunities, including the 1970s built shopping centre and multi-storey car park, which alongside planned public transport improvements, will <u>allow the character of Lewisham to be ‘reimagined’.</u>” [our underlining]</i></p> <p>3.18 We consider that the transition can be appropriately managed with a reduction to max. 30 storeys parameter as has been demonstrated in the detailed townscape and heritage analysis undertaken by Landsec in respect of its emerging proposals.</p> <p>3.19 The urban design characteristics of the northwest of Lewisham Shopping Centre and along Molesworth Street are very similar to the Lewisham Gateway site and land around the transport interchange, the reallocation of these areas within Zone A would ensure greater consistency between the zonal allocation and the evidence base. This would also reflect the opportunity for signature buildings and a clustering of buildings at the taller range. It would also facilitate the implementation of the Lewisham Shopping Centre site allocation which would require some buildings taller than 25 storeys.</p> <p>3.20 Additionally, we recognise that the tall building zone has been intentionally pulled away from Lewisham High Street along the eastern edge of the Lewisham Shopping Centre site, albeit Figure 5.5 now pulls the tall building zone further back from the Tall Building Evidence Base diagram figure 61 without justification. It appears that the tall building zone follows the alignment of back of house service yards, rather than the rear of high street.</p> <p>3.21 Whilst Landsec welcomes the relief, and the approach partly reflects the design analysis undertaken as part of Landsec’s High Street studies, we consider that the tall building suitability zone boundary should be revised to include land opposite Lewisham Gateway (northeast of the Lewisham Shopping Centre site allocation) and land at the southern tip of the site allocation which is bound by the High Street and Molesworth Street. These modifications are supported by the granular study of the Lewisham Shopping Centre site that has</p>		

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							<p>been presented during pre-application discussions regarding the redevelopment of the site. The analysis highlights the ability of the site to accommodate change, including the ribbon of rail and road infrastructure that lies to the west of the site that provides a natural physical and visual buffer, and the existing and emerging tall and coarse grain development located to the north and west of the site. It also highlights the benefits of redeveloping at greater height may afford, thereby freeing up more space at ground floor that would maximise town centre uses and create new publicly accessible space whilst being complementary to the surrounding townscape.</p> <p>3.22 The approach also facilitates regeneration and manages future growth, makes optimal use of the capacity of the site which is well-connected by public transport and has good access to services and amenities. It also emphasises the hierarchy of Lewisham's main centre of activity, an important street junction as well as the transport interchange.</p> <p>3.23 We consider that Figure 5.5 and Schedule 12 should be revised to reflect pre-application discussions and to refer to Max 30. The tall building zone should include land on the northeast corner of Site Allocation 2 and be revised to align with Figure 61 of the Tall Building Evidence Base (2022) along the eastern boundary with the High Street</p> <p>Part D 3.24 Finally, Part D (g) of policy QD4 states that development will preserve or enhance the significance of heritage assets and their setting. This is not consistent with London Plan policy D9 (c) 1d) or national policy which sets out criteria for where harm to heritage assets is identified. Part D (g) of policy QD4 should be updated to reflect the London Plan policy text and national policy, in particular paragraph 202.</p>		
CON042	REP182	Quod OBO Landsec			2	QD 05	<p>View management 3.25 Part C of policy QD5 (View management) states that development proposals must not harm and, wherever possible, seek to make a positive contribution to the characteristics and composition of London Strategic Views and Lewisham Local Views. This is inconsistent with London Plan policy HC4 (London View Management Framework) which in Part A states that development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.</p> <p>3.26 Policy QD5 should therefore be amended as follows so that it aligns with regional policy and is sound:</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 05 View management.</p> <p>The Council considers the respondents comments to be a matter of semantics rather than an issue of soundness. Nevertheless, the Council could consider an amendment to the policy wording.</p>	<p>The Council could consider a modification to the policy wording to ensure consistency – should that be demonstrably necessary to secure soundness.</p> <p>Policy QD 05</p> <p><i>"C Development proposals must should not harm and, wherever possible, should seek to make a positive contribution to the characteristics and composition of London Strategic Views and</i></p>

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							<i>“Development proposals must should not harm and, wherever possible, seek to make a positive contribution to the characteristics and composition of London Strategic Views and Lewisham Local Views...”</i>		<i>Lewisham Local Views, including their protected vistas and landmark elements.”</i>
CON042	REP183	Quod OBO Landsec			2	QD 06	<p>Optimising site capacity</p> <p>3.27 Part C of policy QD6 (Optimising site capacity) states where development proposals do not accord with the indicative capacity set out in a site allocation policy, they will only be supported where it is clearly demonstrated the optimal capacity will be achieved, having regard to (A) and (B) above. However, paragraph 13.8 of the Reg 19 Plan states:</p> <p><i>“Each site allocation includes information on the development capacity of a site for different types of land uses. The process for identifying sites and the methodology used for setting capacity figures are set out in the “Lewisham Local Plan: Site Allocations Background Paper”</i></p> <p><i>– this should be referred for further information. <u>The site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies.</u>” [our underlining]</i></p> <p>3.28 Policy QD6 therefore appears to give the indicative capacity a weight in policy that is not consistent with other parts of the Reg 19 Plan and was never envisaged by the Site Allocation Background Paper which in paragraph 6.2 states:</p> <p><i>“The indicative capacities should not be read prescriptively. The actual development capacity of a site will ultimately need to be determined through the detailed design and planning approval process.”</i></p> <p>3.29 Part C of policy QD6 should therefore be deleted. Site Constraints and Scheme Viability should also be added to the list of criteria set out under Part B of the policy.</p>	<p>The Council notes the comments made in relation to the new Local Plan QD 06 Optimising Site Capacity.</p> <p>The Council notes the specific comments made in relation to Policy QD 06 A and B. The Council considers that the Policy is sound and does not require any amendment.</p> <p>The Council also notes the specific comments made in relation Policy QD 06 C. The Council considers that the policy requirement that proposals secure an optimal capacity that also meets or exceeds the identified indicative site capacity is clear. On that basis, the Council considers the Policy is sound and does not require amendment.</p>	No further actions required in relation to the new Local Plan.
CON042	REP184	Quod OBO Landsec			2	HE 03	<p>4 Chapter 6 - Heritage</p> <p>Non-designated heritage assets</p> <p>4.1 Policy HE3 (Non-designated heritage assets) sets out criteria for locally listed buildings and other non-designated assets as follows:</p> <p><i>“A Development proposals will only be supported where they preserve or enhance the significance of a locally listed building or other non-designated heritage asset, and the asset’s setting.</i></p>	<p>The Council notes the comments made in relation to the new Local Plan Policy HE 03 Non-designated heritage assets.</p> <p>Policy HE 03 Parts A and B</p> <p>The specific comments made in relation to the new Local Plan Policy HE 03 Parts A and B are noted and is discounted. The Council acknowledges that a casual reader could</p>	No further actions required in relation to the new Local Plan.

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							<p><i>In particular, proposals for the sensitive retention, refurbishment and appropriate re-use of non-designated assets will be considered favourably.</i></p> <p><i>B Proposals that unjustifiably harm the significance of a non-designated heritage asset and its setting will be refused."</i></p> <p>4.2 There is a contradiction between parts A and B where part B accepts that there can be harm (where justified) to the significance of a non-designated heritage assess, whereas part A requires the preservation or enhancement of a non-designated heritage asset for development to be supported.</p> <p>4.3 Similarly, Part D(b) states that within Areas of Special Local Character development proposals must:</p> <p><i>"Secure the retention of unlisted buildings where these contribute positively to the local distinctiveness of the area."</i></p> <p>4.4 These approaches are not consistent with national policy. Paragraph 203 of the NPPF states:</p> <p><i>"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."</i></p> <p>4.5 The requirements of policy HE3 go far beyond the requirements of national policy which clearly recognise there is a balance to consider when assessing the impact of an application on a non-designated heritage asset. There is no reference to preservation or enhancement in paragraph 203 of the NPPF. This inconsistency between Parts A, B and D of policy HE3 and paragraph 203 of the NPPF mean that the policy is unsound. These parts should be redrafted to reflect NPPF policy.</p>	<p>interpret the policy wording as being contradictory. However, the Council considers that this is not the case. Decision-taking is an exercise that requires a balanced judgement across the full range of matters that inform the proposal. In this case, the Council acknowledges that scenarios may arise where a proposal involving a non-designated heritage asset is positively considered despite potential harm. In such cases it may be that the proposal provides other benefits that secure quality place-shaping that justify a positive outcome. In this respect, the Council considers the policy sound.</p> <p>Policy HE 03 Part D The new Local Plan clarifies that – <i>"Areas of Special Local Character are places where there is a coherent local character, often based on townscape, architecture and spatial qualities. Their significance will normally rest on the combined qualities of groups of elements rather than the value of the elements taken individually."</i></p> <p>The Council considers it logical and reasonable that in such identified locations non-designated heritage assets may justifiably contribute to the quality of a coherent local character. Consequently, it is entirely reasonable that the new Local Plan set a higher test, than national policy, to consider proposals that could result in the loss of non-designated heritage assets.</p> <p>As stated above, the Council considers that the new Local Plan provides a sound framework for decision-takers to make balanced judgements – taking account of necessary and relevant technical evidence submitted in support of planning applications.</p>	
CON042	REP185	Quod OBO			2	HO 01	5.4 Landsec agrees that the mix of types and tenures should be assessed on a case-by-case basis (Part E of policy HO1 – Meeting Lewisham’s housing needs). Landsec is however concerned that Table 7.1 is overly prescriptive in terms of the	The Council notes the detailed comments made in relation to the new Local Plan Policy HO 01 Meeting Lewisham’s housing needs.	No further actions required in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
		Landsec					<p>unit type mix for affordable homes. In particular the table / H01 E (c) wording does not acknowledge the importance of affordability and market demand for intermediate homes. These factors may mean that in some areas demand does not exist for the proposed 50% 3 and 4 bed homes within the intermediate component. Landsec proposes the following amendment to H01 E (c):</p> <p><i>“The need to secure provision of a mix of unit sizes to meet local need, with reference to the target unit size mix for affordable housing set out Table 7.1 and accounting for market demand and affordability for different types of intermediate homes within the local area”</i></p>	<p>The Council notes the respondent’s stated concern but does not consider this to be a matter of soundness. The Council considers that the policy, and the Borough-wide target unit size mix for affordable housing (identified under Table 7.1) is justified. Certainly, it is possible that other demand scenarios may present themselves during the life of the plan – such assumptions could be applied to several other policy areas. Within that respect, it is important that the new Local Plan provides decision-takers with opportunities to consider demonstrably appropriate alternatives. Within this context Policy HO 01 states –</p> <p><i>“E Development proposals must deliver an appropriate mix of housing within the site and local area. The appropriate mix should be established on a case-by-case basis having regard to the site’s location and character, the nature and scale of development proposed...”</i></p> <p>The Council considers that the above (by itself) provides development partners and decision-takers with sufficient flexibility to consider alternatives on a case-by-case basis when supported by relevant and proportionate evidence.</p> <p>The cited references to other current affordable products are noted.</p>	
CON042	REP186	Quod OBO Landsec			2	HO 03	<p>5 Chapter 7 - Housing Introduction</p> <p>5.1 Chapter 7 of the Reg 19 Plan contains key policies on housing, focusing on securing more genuinely affordable homes, boosting housing delivery and tailoring housing to local communities. Landsec strongly supports the overarching aims of the policy to significantly increase housing delivery and focus efforts to do this within sustainable, well-connected locations.</p> <p>Affordable Housing</p> <p>5.2 Landsec agrees that for genuinely affordable housing (i.e. London Affordable Rent / Social Rent) residents should be</p>	<p>The Council notes the comments and broad level of support offered in relation to the new Local Plan Policy HO 03 Genuinely Affordable Housing.</p> <p>The specific comments made in relation to the current ability to secure lifetime tenancies across the full range of affordable products is noted. Subject to this clarification being considered necessary for the purpose of soundness, the Council could consider amendments that comprehensively address this matter.</p>	<p>Affordable Housing</p> <p>Agree the following amendment to the supporting text on technical grounds -</p> <p>Paragraph 7.24 – “For genuinely affordable homes, we will seek that residents are provided with lifetime tenancies, ideally in perpetuity. The tenants of intermediate tenure products will be provided tenancy protection</p>

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							<p>provided with lifetime tenancies (Para. 7.24). Landsec seeks clarification that this does not apply to intermediate tenures which cannot have the same tenancy agreements as social rent (but do of course have other tenancy protections governed by separate law and policy). Landsec proposes the following amendment to Paragraph 7.24:</p> <p><i>“7.24 ... For genuinely affordable homes, we will seek that residents are provided with lifetime tenancies, ideally in perpetuity.”</i></p> <p>5.3 Landsec agrees that Shared Ownership housing costs should be demonstrably affordable (Para. 7.34). Landsec notes that Shared Ownership income thresholds should be linked to the London Plan and London Plan AMR. The London Plan AMR states in paragraph 3.74 that the Shared Ownership income threshold will be reviewed / updated on an annual basis. It is also considers that the affordability calculation be aligned to the formula in the London Plan AMR (annual housing cost should be no greater than 40% of a household’s net income). Landsec proposes the following amendment to Paragraph 7.34 to align with regional policy.</p> <p><i>“7.34 ... Shared ownership products may also be an acceptable form of tenure, where the total monthly costs are demonstrably affordable. The affordability threshold for intermediate tenures should be aligned to the London Plan Annual Monitoring report which is updated annually. For dwellings to be considered affordable, annual housing costs, including mortgage payments (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40 per cent of a household’s net income.”</i></p>	<p>The comments raised in relation to the consideration of London-wide income threshold datasets is noted. The Council notes that the policy is already sufficiently flexible to allow for the consideration of such additional evidence through the decision-taking process.</p> <p>The suggestion that the policy be further amended to align with regional policy (it is assumed that this refers to the London Plan) is noted and discounted. There is no requirement for the new Local Plan to reiterate the London Plan policy by policy – as the London Plan already forms part of Lewisham Development Plan. The Council considers that the new Local Plan’s approach towards securing affordable housing through new development is in general conformity with the London Plan. It is further noted that the Greater London Authority has not raised this policy area as a matter of general conformity.</p>	<i>through the relevant law and policy.”</i>
CON042	REP187	Quod OBO Landsec			2	HO 07	<p>Student Accommodation</p> <p>5.5 Landsec supports the inclusion of a specific policy (HO7) for purpose-built student accommodation (“PBSA”).</p> <p>5.6 Part A (b) of policy HO7 states that PBSA will only be supported where it is demonstrated that: <i>“The accommodation is secured for use by students, as demonstrated by an agreement with one or more specific higher education provider(s);”</i></p> <p>5.7 We consider that the agreement occurs at the point of occupation not planning application as set out at supporting text at paragraph 4.15.3 of the London Plan <i>“the borough should ensure, through condition or legal agreement, that the development will, from the point of occupation, maintain a</i></p>	<p>The Council notes the comments and broad support offered in relation to the new Local Plan Policy HO 07 Purpose built student accommodation.</p> <p>As acknowledged within the new Local Plan’s policy supporting text, the Borough is home to several further and higher education institutions. In addition, there are a few other similar education institutions located nearby, across the Borough’s administrative boundary. Consequently, it is important that the new Local Plan ensures that an appropriate</p>	No further actions required in relation to the new Local Plan.

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							<p><i>nomination agreement or enter a new nomination agreement with one or more higher education provider(s) for a majority of the bedrooms in the development, for as long as it is used as student accommodation. There is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed."</i></p> <p>5.8 This goes beyond Part A 3) of London Plan policy H15 (Purpose-built student accommodation) which states:</p> <p><i>"the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider" [our underlining]</i></p> <p>5.9 In order to be consistent with the London Plan and therefore sound, Part A (b) of policy HO7 should be replaced with the London Plan policy text.</p> <p>5.10 Landsec supports the definition of affordable student accommodation being aligned to the London Plan at Policy HO7 A (c). It is however proposed that the ability for a student led scheme to be 'Fast Track' is included in the main policy text. The London Plan (Policy H15) states</p> <p><i>"to follow the Fast-Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land"</i></p> <p>5.11 Landsec proposes an amendment to draft Policy HO7 A (c) as follows:</p> <p><i>"A (c) The maximum level of accommodation is secured as affordable student accommodation, in line with the London Plan and including the ability to follow the Fast-Track route (London Plan Policy H15, Purpose-built student accommodation)."</i></p> <p>5.12 Part B (c) of policy HO7 gives priority to sites located in proximity to the education facility the development is intended to serve, or other higher education institutions in the Borough. This is not aligned with policy H15 Part B of the London Plan which states:</p>	<p>quantum and quality of provision can be secured.</p> <p>However, evidence and experience suggest that proposals for new purpose-built student accommodation may come forward (for consideration) on a speculative basis; with no firm commitment that once implemented it will meet the accommodation needs of students attending local education institutions. Given the Borough's land supply trajectory and the higher demand for new genuinely affordable and market housing provision, the Council considers it prudent to ensure that proposals for new purpose-built student accommodation is responding to real need rather than fuelling a property bubble.</p> <p>The comments relating to consistency with the London Plan are noted. For clarity, the London Plan forms part of the Borough's wider Development Plan. As such there is no need for the new Local Plan to regurgitate the London Plan's content. There is a requirement for the new Local Plan to be in general conformity with the London Plan's approaches. It is noted that the Greater London Authority has not identified Policy HO 07 as a matter of conformity. Within the London Plan context, it is entirely permissible and possible for the new Local Plan to seek a "higher bar", and remain consistent, where it demonstrably necessary for such an intervention. The Council considers this to be the case in this instance.</p> <p>The further comments made in specific respect of the London Plan Policy H15 Purpose Built Student Accommodation and the relationship with the Mayor's "fast-track" route are noted. This is not a matter of soundness, as the London Plan already forms part of the Borough's Development Plan.</p>	

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							<p>“Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.”</p> <p>5.13 Part B (c) of policy HO7 is therefore not sound and should be removed.</p> <p>5.14 The Reg 19 Plan has also introduced a requirement in Part C (a) of policy HO7 of a recommended benchmark of 1 square metre of internal and 1 square metre of external communal amenity space per student bed. There is no such benchmark within London Plan policy and we have found no consideration of the introduction of such a benchmark within the Council’s evidence base or upon scheme viability or deliverability. The benchmark should therefore be removed from the policy.</p>	<p>The specific comments relating to the new Local Plan Policy HO 07 Part B c are noted and discounted. The suggestion that this approach is in some way unsound is itself unsound and for that reason is discounted. Plan policies must be read and considered in their entirety, and furthermore within the wider context of the entire Plan (and wider Development Plan). In this case, decision-takers have an appropriate level of flexibility to consider (and determine) the potential scenarios implied in this representation.</p> <p>Finally, the Council considers space standards, for all forms of residential accommodation, to be a key component of securing good quality design. Securing good design is a mutual objective that brings enduring benefits to residents and communities. It also brings benefits to development partners – helping to make their products more saleable. It is noted that the respondent has not provided any evidence to support their position.</p>	
CON042	REP188	Quod OBO Landsec			2	EC 03	<p>Workspace</p> <p>6.1 Part B of policy EC3 (High quality employment areas and workspace) states: “Development proposals for new Class E(g), B2, B8 and similar Sui Generis uses over 2,500 square metres (gross external area) <u>must include a reasonable proportion</u> of flexible workspace or smaller units suitable for micro, small and medium sized enterprises.” [our underlining]</p> <p>6.2 Supporting paragraph 8.20 sets out how the 2,500 sqm benchmark is established by the London Plan and given effect through London Plan policy E2. However, Part D of London Plan policy E2 (Providing suitable business space) states: “Development proposals for new B Use Class business floorspace greater than 2,500 sq.m. (gross external area), or a locally determined lower threshold in a local Development Plan Document, <u>should consider the scope to provide a proportion</u> of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises.” [our underlining]</p> <p>6.3 In order to be consistent with the London Plan and therefore sound, the “must include a reasonable proportion” in policy EC3 needs to be amended to “should consider the scope to provide a proportion”.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 03 High quality employment areas and workspace.</p> <p>The comments made in relation to the London Plan Policy E2 are noted. For clarity, the new Local Plan will be examined in relation its meeting the legal requirements and passing the tests of soundness. There is a further requirement that the new Local Plan demonstrates that it is in general conformity with the London Plan – Lewisham’s relevant strategic planning document. The Council notes that the GLA has not identified this matter as an issue of general conformity.</p> <p>The Council notes that there is an evidenced need for flexible workspace provision across the Borough. This is supported through the new Local Plan Policy EC 04 Low-cost and affordable</p>	No further actions required in relation to the new Local Plan.

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								workspace. The Council maintains that the new Local Plan policy approach is sound.	
CON042	REP189	Quod OBO Landsec				EC 04	<p>6.4 The first part of part D of policy EC4 (Low-cost and affordable workspace) states: “New major commercial development proposals for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and similar Sui Generis uses must make provision for affordable workspace. Developments <u>must provide</u> at least 10per cent of the rentable floorspace (Net Internal Area) as affordable workspace at 50 per cent of market rents. Affordable workspace should be provided on-site.” [our underlining]</p> <p>6.5 The Council’s Local Plan Viability Assessment (May 2022) considers the provision of affordable workspace within schemes and concludes on page 63: “we have tested emerging requirements on schemes which provide new or replacement B1 floorspace at 10% and 20% of floorspace with the discounts of 20%, 30%, 40% and 50% of market rent. The results of our analysis indicate that a requirement for 20% of floorspace discounted by up to 50% of market does not have a significant bearing on the viability of the schemes tested. However, the precise impact on individual schemes will depend on scheme specific composition, including the extent of other floorspace which is not discounted. <u>The affordable workspace policy will therefore need to be applied with a degree of flexibility, including having regard to site-specific viability issues that may emerge on individual schemes.</u>” [our underlining]</p> <p>6.6 Policy EC4 does not however offer any flexibility in how it is applied. In order to be consistent with the evidence base and justified, the policy should be amended as follows: “New major commercial development proposals for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and similar Sui Generis uses must should make provision for affordable workspace. Developments must should provide at least 10per cent of the rentable floorspace (Net Internal Area) as affordable workspace at 50 per cent of market rents having regard to site-specific viability issues that may emerge on individual schemes. Affordable workspace should be provided on-site.” [our underlining]</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 04 Low-cost and affordable workspace.</p> <p>For clarity, the policy clearly states at Paragraph 8.22 that –</p> <p><i>“The cost and availability of workspace can create a barrier to entry in the local economy and wider community, posing challenges for businesses and groups seeking to locate to, start-up or expand in Lewisham. This is particularly for micro, small and independent businesses as well as social enterprises, charities and voluntary organisations. The Local Plan therefore seeks to ensure that existing low-cost and affordable workspace is retained and that new provision is created as commercial development comes forward.”</i></p> <p>It is the council’s conclusion that this is a particularly acute area of need/ demand across Lewisham. As such it is entirely correct that the Council seeks to address this through a policy intervention. The Council considers that this will bring benefits to all parties engaging in the local economy – inclusive of landowners and development partners. Evidence demonstrates no adverse impacts on the continued viability of development. The Council concludes that the policy remains sound.</p>	No further actions required in relation to the new Local Plan.
CON042	REP190	Quod OBO Landsec				EC 12 Retail	<p>Retail</p> <p>6.7 Landsec has provided context to its representations within the Quod Technical Retail Report submitted under separate cover. It has been identified that the Reg 19 Plan (paragraph 8.70) may overstate the future retail capacity in the borough by not identifying an oversupply of comparison retail floorspace (of 3,651 sqm) and reporting a perceived need in the convenience retail sector.</p>	<p>The Council notes the comments made in relation to the technical evidence used to support and inform the preparation of the new Local Plan – specifically in relation to meeting future retail needs.</p> <p>The suggestion that the new Local Plan <i>“may overstate the future retail capacity in</i></p>	No further actions required in relation to the new Local Plan.

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							<p>6.8 This lack of capacity for additional comparison retail floorspace provides important context when considering the strategic approach to the Local Plan and specific policies.</p> <p>6.9 Overall, the updated assessment identifies an oversupply of retail floorspace (both convenience and comparison) for Lewisham town centre of 5,544 sqm (gross) by 2035. This oversupply occurs even before taking into account existing vacant and underutilised floorspace within Lewisham town centre.</p> <p>6.10 It is within the context of an oversupply of retail floorspace and a high level of vacancies that local planning policy should be developed in order that the Council's approach to town centres is effective and justified, and therefore sound. Future planning for town centres should seek to reduce existing vacant and underutilised space, rather than promote delivering additional or retaining large levels of retail floorspace in a contracting market.</p>	<p><i>the borough</i> is challenged. The Council contends that this is a matter of opinion and that the respondent may indeed be mistaken. It is highlighted that the Council approaches this matter from a long-term plan-making context and as such may apply evidence with caution. Given the dynamic nature of retail planning this is entirely correct – particularly in terms of churn of existing provision (for which there is a continuing demand) but also new floorspace. There is a certainty that retail operators will come and go across the plan-period. There is also a certainty that new major multiples will continue to seek new floorspace to match their individual needs and aspirations. This can be evidenced by the arrival of new operators such as Lidl and Aldi, and equally through existing operators that are expanding their offer – such as Primark and Sports Direct. The Council concludes that it is correct for the new Local Plan to take account of such possibilities.</p> <p>For clarity, it is highlighted that the indicative capacities for the site speak to the full range of possible town centre uses – not simply traditional retail. The Council contends that this provides the new Local Plan flexibility and certain degree of future proofing that would accommodate a dynamic town centre commercial environment – potentially comprised of currently unforeseen commercial activities and operations.</p> <p>Nevertheless, the new Local Plan remains a flexible framework. As such there will be opportunities for development delivery partners to identify and evidence changes in market signals, trends, and patterns.</p>	
CON042	REP191	Quod OBO Landsec				EC 11	<p>Policy EC11 – Town centres at the heart of our communities</p> <p>6.11 Policy EC11 reflects the approach of the London Plan and national policy in seeking to focus development on existing town centres.</p>	<p>The Council notes and welcomes the support offered in relation to the new Local Plan Policy EC 11 Town centres at the heart of our communities.</p>	No further actions required in relation to the new Local Plan.

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							<p>6.12 The policy highlights that town centres will be managed positively to ensure they are attractive and vibrant places that are resilient and adaptable to future challenges. Landsec supports this approach.</p> <p>6.13 The supporting text to this policy highlights that there is a need for town centres to remain resilient and adaptable to the challenges and opportunities facing the High Street, including changes in consumer behaviour and business practices. In particular, Paragraph 8.61 goes on to acknowledge that: “This is particularly in terms of the retail sector where Covid-19 has led to a spike in town centre vacancies and accelerated trends in multi-channel (online shopping). Whilst recognising that town centres play a key role in the provision of local shops and services, it is important, that they are able to evolve and adapt over time, so that they continue to support our neighbourhoods and communities. The Local Plan provides support for a wide range of uses to locate within town centres as diversification is vital to their revitalisation, adaptability and long-term resilience.”</p> <p>6.14 Such a flexible approach for town centres is supported by Landsec, so too is the recognition that town centres need to evolve in light of a changing retail landscape – as illustrated by the retail evidence and updated assessment undertaken. The Council should strengthen this objective through the site allocations and town centre policies.</p> <p>6.15 To achieve the long-term vitality and viability of Lewisham’s town centres, policy EC11 states that this will be secured through a number of measures. This includes delivering an appropriate mix and balance of residential and main town uses to attract visitors and ensure people have good access to a competitive range of services and facilities by seeking to define a broad range of matters that comprise vitality and viability. The policy also recognises that there is a need to ensure that town centres remain resilient and adaptable to change over the long-term.</p> <p>6.16 Within this context, whilst protecting the retail function of the Borough’s town centres is crucial, the ability for town centres to evolve and adapt over time, so that they continue to support the communities in which they are situated is welcomed.</p>	<p>The Council notes and welcomes specific comments made in respect of the flexible approach towards town centres being taken by the new Local Plan. The Council considers that such flexible approaches provide development partners with opportunities to identify, and evidence changes in market signals, trends, and patterns, which help inform decision-taking.</p> <p>The Council remains committed to working with its partners to secure the scale and nature of growth being planned-for across the Borough – as a component of delivering successful and sustainable places that benefit residents and communities.</p>	
CON042	REP192	Quod OBO				EC 12	<p>EC12 – Town centre network and hierarchy</p> <p>6.17 Policy EC12 seeks new development to support and reinforce Lewisham’s town centre network and hierarchy.</p>	The Council notes the comments made in relation to the new Local Plan Policy EC 12 Town centre network and hierarchy.	No further actions required in relation to the new Local Plan.

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		Landsec					<p>6.18 This Policy specially refers to the Borough’s future need by 2035 for 8,400 sqm (gross) of additional retail floorspace to be met, and that this should be focused on Lewisham and Catford major centres in the first instance.</p> <p>6.19 The supporting text to this policy (paragraph 8.70) outlines that this floorspace requirement is derived from the findings of the RIATCTR. For all the reasons identified, the RIATCTR overstates the level of retail capacity for Lewisham, and the forecast needs identified within the Local Plan needs to be updated. Policy should seek a consolidation of floorspace and diversification of the overall offer of Lewisham town centre.</p> <p>6.20 Notwithstanding our fundamental concerns with the robustness of the Council’s evidence base, the Council’s own evidence suggests that there is an oversupply of comparison goods floorspace – of more than 3,650 sqm (before taking into account existing vacant floorspace) – and that any retail need falls in the convenience retail sector only.</p> <p>6.21 The identified oversupply needs to be reflected within the Local Plan and by the policy approach for existing centres, including for Lewisham town centre¹⁰.</p> <p>6.22 Furthermore, part G of draft Policy EC12 needs to be amended to reflect the position of the London Plan and refer to the ‘potential’ future reclassification of Lewisham as a Metropolitan Centre.</p> <p>“EC12(F) Development of Lewisham town centre and its surrounds will be proactively managed in order to secure its potential future reclassification as a Metropolitan centre....”</p>	<p>For clarity, the new Local Plan Policy EC 12 sets out how the Borough’s town centre network and hierarchy will evolve and grow in accordance with the Borough-wide spatial strategy. The Council considers this a sound approach.</p> <p>As stated above, the Council notes the comments made in relation to the technical evidence used to support and inform the preparation of the new Local Plan – specifically in relation to meeting future retail needs.</p> <p>The Council respectfully acknowledges that the respondent has an opinion that the new Local Plan “<i>may overstate the future retail capacity in the borough</i>”. As implied above, evidence prepared in support of the new Local Plan was produced within a plan-making context. It is logical that evidence proposing an alternative opinion was prepared within a different context – namely, one that specifically seeks to challenge rather than support.</p> <p>The Council contends that the new Local Plan is sound – particularly given the dynamic nature of retail planning and specifically in terms of churn of existing provision (for which there is a continuing demand) but also new floorspace.</p> <p>Nevertheless, the new Local Plan remains a flexible framework. As such there will be opportunities for development delivery partners to identify and evidence changes in market signals, trends, and patterns. The Council notes that the respondent has, elsewhere, acknowledged and welcomed this inherent flexibility.</p> <p>The further commentary given on the future reclassification of Lewisham as a Metropolitan Centre (through the London Plan) is noted. The Council remains positive about the potential for such reclassification, which will bring benefits to</p>	

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								residents, communities, and businesses. It is unclear to the Council why the respondent would not seek to share such a positive outlook. Furthermore, the Council notes that the London Plan will be subject to review during the lifespan of the new Local Plan. Consequently, it is entirely correct that it addresses this matter positively (in accordance with NPPF Paragraph 22).	
CON042	REP193	Quod OBO Landsec				EC 13	<p>EC13 - Optimising the use of town centre land and floorspace</p> <p>6.23 Policy EC13 refers to the need for development proposals within and at edge-of-centre locations to optimise the use of land and floorspace through delivering new mixed-use schemes. Landsec supports this approach.</p> <p>6.24 However, Part B of this Policy goes on to states that mixed-use development proposals within town centres will be considered having regard to the impact on the town centre vitality and viability.</p> <p>6.25 Effectively the wording of draft Policy EC13 requires an assessment of impact to be undertaken in support of ‘in centre’ proposals. The is fundamentally inconsistent with national planning policy which recognises the need for greater flexibility in the reuse of town centre floorspace. Both national policy and the London Plan is clear in stating that ‘impact’ is only a policy consideration for retail and leisure development located outside a town centre¹¹.</p> <p>6.26 Against this background, the wording of Policy EC13 should be revised so that consideration on the impact on town centre vitality and viability should only be for mixed-use development proposals in edge or out-of-centre locations. Proposed amended wording is provided below:</p> <p>“B Within town-centre and edge and out-of-centre locations, mixed use development proposals (including the expansion, reuse or reconfiguration of existing floorspace) will be considered having regard to: a. The role and function of the centre; b. Impact on town centre vitality and viability; c. Compatibility of the proposed use with adjoining and neighbouring uses, both in terms of land use and character; and d. Compliance with other policies.”</p> <p>6.27 Also, consistent with the NPPF (paragraph 86), this Policy includes additional wording acknowledging that residential</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 13 Optimising the use of town centre land and floorspace. The broad support offered in relation to the policy is welcomed.</p> <p>The Council considers optimising opportunities for accommodating planned-for future growth it a key component of sustainable and successful place-making. The spatial strategy’s approach that directs future growth to sustainable and accessible locations (Figure 3.3) is sound. New Local Plan policies such as Policies QD 06, HO 02, EC 03 and EC 13) seek to optimise such opportunities to secure successful place-making.</p> <p>The Council notes the comment made in respect of Policy EC 13 Part B. Within this context, the Council considers that mixed-use proposals – specifically those securing vertical intensification above existing ground and lower floor commercial activity – may have a harmful impact on the vitality and viability of retail/ commercial uses to continue to function at high street/ lower levels (IE below any new residential uses). This is an understood and acknowledged phenomenon – where new upper floor residential uses impinge upon the economic activity of the town centre. This is both in terms of direct operation and possible incompatibility. In terms of the latter, this is particularly the case in respect of conflicts that may arise between new residential uses and established town centre evening/ night time economic</p>	No further actions required in relation to the new Local Plan.

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							<p>development often plays an important role in ensuring the vitality and encourage residential development on appropriate sites.</p> <p>6.28 Within this context, we believe that draft Policy EC13 is not justified, effective or consistent with national policy and therefore unsound, and should be re-drafted in line with the comments above.</p>	<p>activities. The Council considers it sound that plan-makers and decision-takers consider such impacts. It is noted that appropriate and proportionate consideration of such matters benefits all parties involved in place-making.</p> <p>The suggestion that the policy be expanded to incorporate locations encapsulated within the broader definition of “out-of-centre” sites is discounted. The new Local Plan must be read as a whole and already addresses this matter through the spatial strategy, site allocations and other planning policies.</p>	
CON042	REP194	Quod OBO Landsec				EC 14	<p>EC14 - Major and District Centres</p> <p>6.29 Policy EC14 establishes policies for the Primary Shopping Areas (‘PSA’), the locations where retail uses are concentrated.</p> <p>6.30 As currently drafted, this Policy requires development proposals within existing centres to demonstrate how they will support the vitality and viability of the town centre. Again, such an approach is at odds with national policy and the London Plan.</p> <p>6.31 Likewise, other parts of this Policy require certain criteria to be met when considering development proposals within town centres, and the PSA. This includes the following: ▪ Part C, which identifies that a Shopping Area Impact Statement will be required where development proposals for Class E and main town centre uses do not contribute to the retail function of the PSA. ▪ Part D of this Policy goes on to state that within Lewisham Major centre, development proposals should support the role and function of the centre by contributing to the target for the PSA to maintain a minimum of 50% of retail uses as a proportion of all units. ▪ Part F, identifies that planning conditions may be used to secure Class E(a) uses that contribute to the retail function of the PSA. It goes on to state that evidence of marketing will be required for development proposals seeking a change of use from retail to another main town centre use. ▪ Part G states that proposals for residential units on the ground floor level or below, both within the PSA and the wider town centre area, are inappropriate and will be strongly resisted.</p> <p>6.32 Such an approach provides little flexibility in the re-use or redevelopment of underutilised or vacant floorspace, is</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 14 Major and District Centres. The broad suggestion that the policy be amended (or deleted entirely) to allow for a more permissive development regime that accommodates other town centre uses and residential accommodation is noted and discounted.</p> <p>For clarity, the policy objection is clearly set out under Paragraph 8.77, which states that –</p> <p><i>“This policy designates the Primary Shopping Areas within Lewisham’s Major and District Centres, which are shown on the Policies Map. PSAs are characterised by their predominantly retail role and character and remain a focal point for town centre activity, particularly as they tend to be in the most accessible parts of the centre. The Local Plan seeks to ensure that the retail function of these areas is maintained and enhanced to support the long-term vitality and viability of the town centres.”</i></p> <p>In summary, the policy seeks to protect and enhance these locations, as foci for future growth, within the broader context of the spatial strategy. The identified centres are Lewisham’s focal points for</p>	No further actions required in relation to the new Local Plan.

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							<p>inconsistent with the position now being adopted by Government, and the Framework. The Framework is clear in recognising that residential development can play an important role in ensuring the vitality of town centres.</p> <p>6.33 The overall thrust of Policy EC14 is at odds with national policy and the London Plan, where both recognise ‘town centres’, including the PSA, as appropriate locations for ‘main town centre uses’ and not just retail. National policy¹² recognises that town centres should grow and “diversify in a way that can respond to rapid changes in retail and leisure industries, allows a suitable mix of uses (including housing)”.</p> <p>6.34 The Framework¹³ goes on to state that planning policies should: “recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites”.</p> <p>6.35 The London Plan (Policy SD6) also reinforces the need to promote and enhance town centre vitality and viability. Specifically, it recognises that “the adaption and diversification of town centres should be supported” in response to changing shopping patterns. Policy SD6 also refers to the importance of introducing new homes into town centres.</p> <p>6.36 Further reflecting the changing retail sector, the Government announced significant changes to the Use Classes Order, which came into effect in September 2020. This incorporated a number of ‘main town centre uses’ within the same Use Class (Class E). The driving rationales for the Government making these changes was to enable flexibility and for town centres to adapt to a changing market.</p> <p>6.37 It is within this national and strategic context that policies within the Local Plan should be prepared. Whilst elsewhere in the Local Plan, it is recognised that town centres need to be more resilient and adaptable to future changes (e.g. Policy EC11) the approach of the Policy EC14 is contrary to this important objective, and the main thrust of the NPPF and the London Plan in allowing town centres to adapt.</p> <p>6.38 The need for flexibility within town centres is particularly significant for Lewisham town centre given the identified oversupply of retail floorspace and the substantial quantum of existing vacant floorspace.</p>	<p>sustainable growth – being highly accessible, containing a successful mix of commercial, retail, community, and compatible residential uses. Critically they are interconnected nodes within the Borough’s infrastructure networks. Fact.</p> <p>Furthermore, the –</p> <p><i>“Primary Shopping Areas (PSAs) are the locations within Lewisham’s Major and District centres where retail uses are and should be concentrated. Development proposals should support the retail function of the PSA.”</i></p> <p>The laissez faire free-for-all proposed by the respondent runs the certain risk of undermining the justified level of protection provided by the policy. Within this context, the Council considers it reasonable that policy require development proposal that depart from the primary retail function are properly assess through the decision-taking process. This itself provides development partners with an opportunity to demonstrate the evidence for a departure.</p> <p>The Council acknowledges that retail environments are subject too dynamic change. However, the planning system and the new Local Plan provide development partners with the opportunity to inform decision-taking through evidenced market signals. The Council notes that historically retail demand is subject to fluctuation – and that an assumption that it is on an inexorable downward spiral is unwise.</p> <p>The claim that the policy is not in general conformity with the London Plan is noted and robustly discounted. It is unclear from the representation how or why the submission is not in general conformity with the London Plan Policy E9.</p>	

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							<p>6.39 It is therefore essential that policies are flexible and allow the town centre to diversify and adapt. The approach of Policy EC14 is one that may stifle flexibility and will not enable Lewisham town centres' long-term vitality and viability to improve. Instead, it will maintain the status quo of a centre through preventing the diversification of the town centre in a contracting retail market.</p> <p>6.40 Policy EC14 is not deemed to be effective or justified and should be removed or re-drafted to enable the flexibility required to ensure town centres, including Lewisham town centre, can adapt. This will include removing the need to undertake a Shopping Impact Statement for 'in centre' proposals and the target to achieve 50% threshold for Class E(a) uses. Neither is justified.</p> <p>6.41 Main town centre uses are supported in town centre locations, as reflected by the NPPF and the London Plan, being identified as the most appropriate location. The approach of Policy EC14 restricts the ability for town centre uses to be located within such locations.</p> <p>6.42 Lewisham town centre, and in particular Lewisham Shopping Centre and the wider Site Allocation 2, is currently heavily focused on the retail sector, with limited wider town centre uses. However, the approach of the retail policies within the Reg 19 Plan will prevent this diversification. Such an approach is contrary to the retail evidence, which supports the need to consolidate and rationalise Lewisham town centre's retail offer, moving away from a retail focus – as is currently the case – introducing other uses that will improve its vitality and viability, which will include residential uses.</p> <p>6.43 The proposed approach of Policy EC14 is also at odds with the advice contained within the RIATCTR (paras. 5.40 to 5.48). This evidence specifically considered four broad policy options that should be considered. These comprise the following:</p> <ul style="list-style-type: none"> ▪ Option 1: Strengthening policies to provide more control over the loss of retail and service uses. This would usually involve extending the PSA and / or increasing the restrictions on uses permitted; ▪ Option 2: Retaining the existing approach to control the mix of uses; ▪ Option 3: amend policies to allow a more flexible approach to enable more non-town centre uses. This would usually involve reducing the PSA and / or introducing more flexibility; or Option 4: a laissez-faire approach that does not seek to protect 	<p>The Council highlights the shared corporate and plan-making objective to raise the status of Lewisham Town Centre to that of a Metropolitan Town Centre. The Council highlights that it is appropriate for the new Local Plan to include such realistically aspirational objectives. Furthermore, the Council notes that the respondent has expressed clear support for achieving this objective. Consequently, it is surprising that this representation appears to be in clear conflict with their own stated position.</p>	

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							<p>retail and town centre uses, on the basis that the market will determine the appropriate mix of uses within town centres.</p> <p>6.44 In considering these four options, the RIATCTR (para. 5.42) advised that: “Considering current and likely future market trends, the updated (lower) retail floorspace capacity projections, and changes to the UCO [Use Classes Order] and permitted development rights described earlier, Options 1 and 2 are unsound and unimplementable approaches for existing premises.”</p> <p>6.45 Despite this, policies within the Reg 19 Plan have evolved from the earlier Regulation 18 version to place further restrictions on flexibility and the ability for town centres to adapt and change. This is despite the Council’s updated retail evidence (the RIATCTR) now identifying significantly less retail capacity for additional retail floorspace, including an oversupply of comparison retail floorspace. The Council’s own evidence acknowledges that not providing the necessary flexibility could lead to an increase in vacancies within town centres.</p> <p>6.46 Whilst the RIATCTR suggests that such controls are unsound and unimplementable for existing premises, this also applies for new development proposals. Given the available retail evidence and the reduced demand for traditional bricks and mortar floorspace, together with the approach supported by the NPPF and the London Plan, policies should provide greater flexibility. This is not the case in the Regulation 19 Local Plan. Instead, policies, including Policy EC14, seek to limit flexibility and will not enable Lewisham town centre (and other centres in the Borough) to adapt and change in a retracting retail market.</p> <p>6.47 It is also notable that the supporting text (paragraph 8.71) recognises that RIATCTR recommends that the priority should be given to the re-occupation of vacant units to meet the retail floorspace needs, this is not recognised by the policy approach of the Council or in the floorspace need figures referred to within the Reg 19 Plan. Instead, the approach of the Reg 19 Plan seeks to encourage more retail floorspace and no flexibility, despite such an approach not being supported by evidence. Future planning policies for town centres should seek to reduce existing vacant and underutilised space, rather than delivering more floorspace – particularly where a need is not demonstrated – as is the approach of the Regulation 19 Local Plan.</p>		

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							6.48 As currently drafted Policy EC14 is not sound and effective and is inconsistent with both the NPPF and the London Plan. It therefore needs to be substantially revised to enable flexibility for town centre to adapt and change.		
CON042	REP195	Quod OBO Landsec			2	CI 03	<p>Community Infrastructure</p> <p>7.1 Part E (g) of policy CI3 (Sports, recreation and play) states that all play space and provision for informal recreation must be designed to site outdoor communal amenity and play spaces at the street level or ground floor of development, avoiding the use of rooftops and mezzanines.</p> <p>We suggest that the policy should introduce flexibility to recognise that in some circumstances, such as town centre development, multi level open space, recreational space and play space is an important and necessary component of town centre vitality and viability, and can contribute successfully towards residential amenity.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy CI 03 Sports, recreation and play.</p> <p>The suggestion that the policy be amended to provide flexibility to allow the positive consideration of proposals for “multi-level” open space is discounted. The Council considers accessibility to infrastructure networks, including public open space, to be a key tenet of sustainable development, successful place-making and good quality design. Alternatives that could result in segregated provision will not normally be supported.</p> <p>For clarity, the supporting text, at Paragraph 9.17 states –</p> <p><i>“To support inclusive neighbourhoods and communities we will seek to ensure that all play space is free to use and made accessible to the wider public. Development proposals that unreasonably restrict access to play space, for example, by fencing or other measures will be refused. “</i></p> <p>Nevertheless, the Council concedes that there may be exceptional circumstances where such proposals provide the only form of deliverable on-site provision. Rather than provide a positive policy route for such solutions the Council proposes that they come forward iteratively through the master planning and design-led approaches to be consider as genuinely exceptional circumstances. It will be for decision-takers and development industry partners to work collegiately to secure innovative solutions that minimise the potentially harmful aspects of such provision, in those few circumstances</p>	No further actions required in relation to the new Local Plan.

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								where it is demonstrably the only way forward.	
CON042	REP196	Quod OBO Landsec			3	LCA 02	<p>Lewisham major centre and surrounds</p> <p>8.1 Part J of policy LCA2 (Lewisham major centre and surrounds) states:</p> <p><i>“To ensure Lewisham Major Centre maintains its role as one of the Borough’s principal commercial and employment locations, development proposals must retain or re-provide existing workspace, and deliver net gains in industrial capacity wherever possible.” [our underlining]</i></p> <p>8.2 This has no regard to policies in Chapter 8 of the Reg 19 Plan (Economy and Culture) which set out criteria for where reductions in employment floorspace might be acceptable (policy EC8). It is a broad statement which provides no opportunity to assess its applicability to individual sites, where for instance there has been long term vacant employment floorspace.</p> <p>8.3 As described in Section 4 above the Council’s evidence base describes the weak demand for office space in Lewisham.</p> <p>8.4 Part J of policy LCA2 introduces unnecessary inflexibility, is not supported by the evidence and is a matter that should be addressed in other Chapters of the Reg 19 Plan. Part J should be deleted.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA 02 Lewisham major centre and surrounds.</p> <p>The suggestion that the policy may conflict with the parallel new Local Plan Policy EC 08 Non-designated employment sites is noted. For clarity, Policy EC 08 states that –</p> <p><i>“Non-designated employment sites are those that contain or consist principally of Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and similar Sui Generis uses, and which are located outside of SIL, LSIS and MEL. These sites make an important contribution to Lewisham’s local economy by providing workspace for businesses and job opportunities. Development proposals should protect and not result in the net loss of viable industrial capacity on these non-designated employment sites.”</i></p> <p>Whilst Policy EC 08 provides an appropriate degree of flexibility to allow decision-takers to consider opportunities for new mixed-use development it has a clear objective to protect non-designated employment sites and in a wider context maintain viable industrial capacity. The Council considers this sound and compatible with Policy LCA 02.</p> <p>For further clarity the new Local Plan Policy LCA 02 requires that -</p> <p><i>“To ensure Lewisham Major Centre maintains its role as one of the Borough’s principal commercial and employment locations, development proposals must retain or re-provide existing workspace, and deliver net gains in industrial capacity wherever possible.”</i> (the Council’s underlining).</p>	No further actions required in relation to the new Local Plan.

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								The Council considers this a key component of making Lewisham Town Centre a successful and sustainable place. It is noted that the respondent has not provided any evidence that such an approach is undesirable, inappropriate, or unviable. As stated elsewhere, the new Local Plan must be considered in its entirety. As such the Council considers that it provides a sound and flexible framework to consider proposals that may depart from some of the Plan's detailed requirements – subject to those departures being demonstrably necessary to secure successful place-making.	
CON042	REP197	Quod OBO Landsec			4	DM 03	<p>Masterplans and Comprehensive Development</p> <p>9.1 Part B of policy DM3 (Masterplans and comprehensive development) states that where an outline application is submitted, it should be accompanied by a full planning application for the first phase of the development.</p> <p>9.2 This goes beyond any requirement of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). Article 7 (3) states that except where article 5(3) applies, an application for outline planning permission does not need to give details of any reserved matters (article 5(3) relates to where access is a reserved matter).</p> <p>9.3 Given this conflict with the Statutory Instrument, part B of policy DM3 should be amended as follows:</p> <p><i>“The site masterplan must be submitted at the outline or full planning application stage. Where an outline application is submitted, it should be accompanied by a full planning application for the first phase of the development. The masterplan will be required to comprise of:</i></p>	<p>The Council notes the comments made in relation to the new Local Plan Policy DM 03 Masterplans and comprehensive development.</p> <p>For clarity, the policy states at Paragraph 19.14 –</p> <p><i>“In order to achieve the Local Plan’s vision and strategic objectives it will be important that all development proposals positively engage with and seek to deliver the spatial strategy for the Borough. This is particularly vital for those sites that have been allocated for their strategic role and potential to deliver new and improved housing, business space, public realm, facilities and other infrastructure to support our communities.”</i></p> <p>The policy continues at Paragraph 19.15 –</p> <p><i>“To help ensure certainty of outcomes, the Council will seek that masterplans are submitted at the outline or full planning application stage.”</i></p> <p>It is noted that many development industry partners will submit proposal under the aegis of “enhanced” outline applications, rather than submitting a full planning application. Such enhanced applications typically extend beyond the</p>	No further actions required in relation to the new Local Plan.

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								<p>normal scope of normal outline proposals. It is the Council's experience that such enhanced applications can "sidestep" a consequential full application and tend to result in (for example) reserved matter applications. Such applications are inevitably highly focused (for example upon detailed matters such as materials) and provide limited transparency and opportunities for engagement.</p> <p>The approach set out under Policy DM 03 provides a clear sequential approach that benefits all parties involved in the delivery and decision process. For clarity the policy does not stipulate that the process "must" but rather "should" pass from outline to full. It is noted that there is considerable case law that supports such flexible policy language, and that it remains within partners gift to demonstrate why a departure is justified. The Council considers that the policy remains sound.</p>	
CON042	REP198	Quod OBO Landsec				DM 04	<p>Land Assembly</p> <p>9.4 A review of policy DM4 (Land assembly) has been undertaken in the context of the Town and Country Planning Act compulsory acquisition of land and legal requirements for this. The following amendments are proposed to ensure consistency with the Act.</p> <p><i>A To enable the delivery of the Local Plan and the spatial strategy for the Borough the Council will support land assembly to achieve comprehensive development, where appropriate. The Council will consider the use of its compulsory purchase powers, only where necessary, to assemble land for development within the Borough where there is a compelling case in the public interest to do so and where:</i></p> <p><i>a. Landowners and/or developers, as appropriate, can demonstrate that: there is a deliverable development proposal that will contribute to the achievement of the economic, social or environmental well-being of the area, or</i></p> <p><i>i. There is a viable and deliverable development proposal that appropriately satisfies the Local Plan requirements; and</i></p> <p><i>ii. They have made all reasonable efforts to acquire, or secure an option over, the land and/or building(s) needed, through negotiation.</i></p>	<p>The Council notes and discounts the suggested amendments and additions to the new Local Plan Policy DM 04 Land assembly.</p> <p>The Council acknowledges that circumstances may arise when compulsory purchase powers are deployed to secure land interests outside of comprehensive redevelopment scenarios. However, the policy is clear is setting out that the Council's focus in deploying such powers is to secure a comprehensive approach to development of sites, which is often in the public interest. The purpose of the policy is land assembly (to achieve comprehensive development). The policy does not preclude the Council from deploying compulsory purchase powers in other circumstances, where they are necessary.</p> <p>The Council notes that the respondent has suggested amendments to secure "consistency with the Act". It is unclear</p>	No further actions required in relation to the new Local Plan.

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							<p><i>b. A comprehensive approach to redevelopment of the assembled site is necessary to will deliver a strategic site allocation contained in the Local Plan (including the requirements of a masterplan where required) in a manner that delivers public benefit; and or</i></p> <p><i>c. The development proposal for the assembled site will contribute to the delivery of the spatial strategy for the Borough, having particular regard to the Vision and place principle policies for the area within which the development is located.</i></p> <p><i>And where reasonable efforts have been made to negotiate with the landowners and occupiers of the relevant land.</i></p> <p><i>B Where compulsory purchase is necessary, and determined to be an appropriate option for securing development that supports the delivery of the spatial strategy, applicants will be required to demonstrate how the associated costs will impact upon development viability.</i></p> <p><i>In appropriate cases, the Council will consider the use of its other statutory powers, including section 203 of the Housing and Planning Act 2016, to facilitate development where it is in the public interest.</i></p> <p>9.5 In relation to the amendments proposed to Part A, the use of CPO powers should not be limited to “comprehensive development”, but to development for which there is a compelling case in the public interest. Often that will be comprehensive development, but not always. Also, the use of the word “necessary” does not fit with the wording is S226(1)(a), which is that the authority thinks that the use of the powers will facilitate the development, redevelopment or improvement of land.</p> <p>9.6 The statutory test for using S 226(1)(a) powers is found in S 226(1A), which is that the use of the powers will contribute to the achievement of the social, economic or environmental wellbeing of the area, rather than satisfying local plan requirements. That can be part of the well-being test. Landsec consider that it is not necessary to have a test involving demonstrating how the costs of a CPO process will impact on development viability. That will be part of the Council’s consideration of whether to use its CPO powers, and should not be a separate policy test.</p>	<p>why this would be necessary as the policy does not conflict with the Act. It is clear that the Council, in deploying its compulsory purchase powers, must do so in accordance with the Act. The existing wording does not suggest, nor enable, any form of departure. For these reasons no further changes are necessary.</p>	

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							9.7 In relation to the amendments proposed to Part B there will be cases where, in order to facilitate development, the use of S 203 will be needed instead of/in addition to the use of CPO powers. It is important to make that clear.		
CON042	REP199	Quod OBO Landsec			2	EC 11	<p>1 The Policy Basis for Town Centre Diversification</p> <p>1.1 Landsec’s representations and vision has its foundations within adopted national policy, the National Planning Policy framework (2021) (the ‘Framework’) and the London Plan (2021).</p> <p>1.2 Policies within both documents, support adaptation and diversification of town centres to respond to the anticipated needs for town centre uses such as retail, office and leisure.</p> <p>1.3 Diversification in centres with current or projected declining demand for commercial, particularly retail, floorspace should be supported, alongside the promotion of residential floorspace which is considered a fundamental component of town centre vitality and viability.</p> <p>National Planning Policy – The Framework (2021)</p> <p>1.4 National policy relating to the vitality of town centres (Chapter 7) requires planning policies and decisions to support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaptation¹.</p> <p>1.5 National policy recognises that town centres should grow and “<i>diversify in a way that can respond to rapid changes in retail and leisure industries’ allowing ‘a suitable mix of uses (including housing)’</i>”².</p> <p>1.6 Development plan policies should “<i>recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites</i>”³.</p> <p>1.7 National policy recognises that markets should be retained and enhanced and, where appropriate, new ones should be re-introduced or created⁴.</p> <p>1.8 Fundamentally, the anticipated needs for retail, office and leisure should be met, looking at least ten years ahead⁵.</p>	<p>The Council notes the introductory and contextual comments made in relation to national planning policy, the London Plan, Lewisham Town Centre, and town centre planning.</p> <p>The statement that Landsec’s representation and vision has its foundations in adopted national and structure plan policy (the London Plan) is noted with interest. For clarity, Landsec is a commercial real estate organisation that is responsible/ accountable to its shareholders/ investors.</p> <p>National Planning Policy The comments made in relation to national planning policy are noted. The Council considers that the new Local Plan has been prepared in accordance and is broadly consistent with national policy. Where departures from national policy have been made these are in direct response to local conditions and have been informed/ triggered by the evidence base.</p> <p>In respect of town centres, employment and retail planning the Council considers that the Local Plan is sound.</p> <p>The London Plan The comments made in relation to the London Plan in respect of how it approaches town centre diversification, role and function, adaptive strategies/ town centre flexibility (outside of the London Plan) and Lewisham Town Centre (as a specific location). The Council has sought to positively prepare the new Local Plan in general conformity with the London Plan, and where necessary other strategies being deployed by the Mayor. The Council notes that within the context of the respondent’s representations, the Greater</p>	No further actions required in relation to the new Local Plan.

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							<p>1.9 Reflecting the changing retail sector, the Government announced significant changes to the Use Classes Order which could render retail only town centre polices redundant. Class E (Commercial, Business and Service) will incorporate a very wide spectrum of uses including Retail (previously A1), Financial and professional services (previously A2), Restaurant (previously A3), Offices (previously B1a), Research and Development (previously B1b), Light Industrial (previously B1c), Medical and health facilities (previously D1), Creches and day nurseries (previously D1), and Indoor sport, recreation and fitness facilities (previously D2).</p> <p>1.10 This new class allows for a mix of uses to reflect changing retail and business models. It recognises that a building may be in a number of uses concurrently or that a building may be used for different uses at different times of the day.</p> <p>1.11 The Government expects that bringing these uses together and allowing movement between them will give businesses greater freedom to adapt to changing circumstances and to respond more quickly to the needs of their communities.</p> <p>London Plan (2021) Diversification</p> <p>1.12 The London Plan Policy SD6 'Town Centres and High Streets' reinforces the need to promote and enhance town centre vitality and viability (Part A). It seeks to achieve this through inclusivity; a diverse range of commercial and community/social uses (operational day and night); housing; access by walking, cycling and public transport; creating a sense of place and local identity; economic contribution; and a Healthy Streets Approach⁶. Whilst the London Plan does not define vitality and viability, it may be construed that this comprises a reasonable definition.</p> <p>1.13 The policy specifically recognises that <i>"the adaptation and diversification of town centres should be supported in response to the challenges and opportunities presented by multichannel shopping and changes in technology and consumer behaviour, including improved management of servicing and deliveries"</i>⁷.</p> <p>1.14 Part C and D refer to the importance of introducing new homes into town centres. The potential for new housing within town centres should be realised,</p>	<p>London Authority has not raised any concerns of general conformity.</p> <p>Lewisham Town Centre Local Plan The Council notes the comments made in relation to this document and the general support offered in relation to those elements that remain relevant. For clarity, this document and its policies will be superseded by the new Local Plan.</p>	

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							<p>capitalising on the availability of services within walking distance and current/future accessibility by public transport⁸. The suitability of town centres to accommodate a diverse range of housing should also be considered and encouraged. Specific reference is made to smaller households, Build to Rent, student accommodation and older people's housing⁹ as being suitable for town centres.</p> <p>1.15 The re-development change of use and intensification of identified surplus office space to other uses including housing should be supported; social infrastructure should be enhanced; and Safety and security should improve.</p> <p>1.16 Boroughs should support the town centre first approach in their development plans by assessing the need for main town centre uses, taking into account capacity and forecast future need; allocate sites to accommodate identified need within town centres, considering site suitability, availability and viability, and review town centre boundaries where necessary; support the development, intensification and enhancement of each centre, having regard to the current and potential future role of the centre in the network; identify centres that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators for individual centres in Annex 110.</p> <p>1.17 In respect of identifying sites suitable for higher density mixed-use residential intensification the London Plan suggests a number of relevant examples:¹¹</p> <ul style="list-style-type: none"> ▪ comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge-of centre retail/leisure parks. ▪ redevelopment of town centre shopping frontages that are surplus to demand. ▪ redevelopment of other low-density town centre buildings that are not of heritage value, particularly where there is under-used space on upper floors, whilst re-providing nonresidential uses; and ▪ delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses as part of a mixed-use development. <p>1.18 The rest of the policy suggests a flexible approach based upon existing capacity, forecast need and diversification. Vitality and viability are not dictated solely</p>		

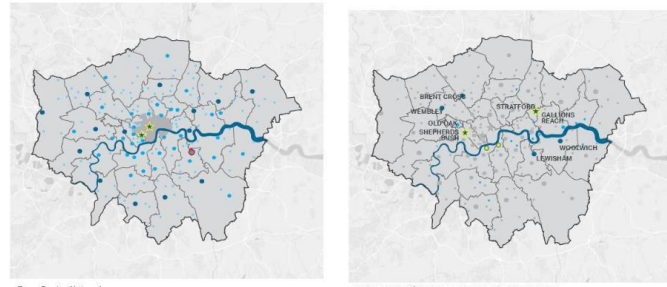
Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							<p>by retail floorspace quantum, rather a whole range of uses, including housing.</p> <p>The Role and Function</p> <p>1.19 Policy SD8 'Town Centre Network' recognises that <i>"the changing roles of town centres should be proactively managed"</i> in relation to Annex 1. Diversification in centres with current or projected declining demand for commercial, particularly retail, floorspace should be supported¹². These centres may be reclassified at a lower level in the hierarchy through a coordinated approach with local planning authorities.</p> <p>1.20 The classification of International, Metropolitan and Major town centres (Annex 1) can only be changed through the London Plan.¹³ Annex 1 indicates potential future changes to the Town Centre Network. International, Metropolitan and Major town centres should be the focus for the majority of higher order comparison goods retailing, whilst securing opportunities for higher density employment, leisure and residential development in a high-quality environment. Boroughs and other stakeholders should have regard to the broad policy guidelines for individual town centres in Annex 1.</p> <p>1.21 The London Plan defines Metropolitan centres as serving wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically, they contain at least 100,000m² of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings.</p> <p>1.22 The London Plan defines Major centres as typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000m² of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions.</p> <p>Lewisham</p> <p>1.23 The London Plan Annex 1 Town Centre Network (and Figure 2.18 Town Centre Classification) provides strategic guidance for town centres in London.</p>		

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							<p>1.24 Lewisham is categorised as a Major Town Centre (ref. 40) with ‘future potential’ for classification as a Metropolitan Centre. The broad London Plan approach for Lewisham is set out below.</p> <ul style="list-style-type: none"> ▪ Residential growth potential – High – This is a broad strategic-level categorisation that has been informed by the SHLAAA and Town Centre Health Check and takes into consideration the potential for impacts on heritage assets. ▪ Commercial growth potential – High – includes town centres likely to experience strategically-significant levels of growth with strong demand and/or large-scale retail, leisure or office development in the pipeline and with existing or potential public transport capacity to accommodate it (typically PTAL 5-6). ▪ Office Guideline – C – Protect small office capacity – These centres show demand for existing office functions, generally within smaller units. Category C is the lowest growth category for offices. Category A centres have the capacity, demand and viability to accommodate new speculative office development; and Category B the capacity, demand and viability to accommodate new office development, generally as part of mixed-use developments including residential use. ▪ Night-time economy classification – NT3 – These centres have a strategic night-time function involving a broad mix of activity during the evening and at night, including most or all of the following uses: culture, leisure, entertainment, food and drink, health services and shopping. NT3 is a more than local centre. For reference NT1 is an international or national centre and NT2 is a centre with regional or sub-regional significance. ▪ Strategic area for regeneration – Yes <p>1.24 The London Plan allocates New Cross/Lewisham/Catford as an opportunity area for 13,500 homes and 4,000 jobs. The relationship with this wider growth area is important because New Cross (District) and Catford (Major) are designated town centres themselves and include uses which in other Boroughs may include in higher level town centres (e.g., Metropolitan Centres) e.g., the Civic Centre, Broadway Theatre, Goldsmith’s College and other evening economy/cultural uses.</p> <p>1.25 Unlike Croydon or Kingston, for example, where all the uses are concentrated within the Metropolitan Town Centre, Lewisham is different as these uses are located in adjacent centres. The potential for Lewisham to achieve</p>		

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							<p>Metropolitan status does therefore need to consider the residual effects on the growth and renewal ambitions of Catford and Deptford.</p> <p>1.26 Supporting text paragraph 2.1.19 states that Lewisham will grow in function and population and has ‘potential’ to become a town centre of Metropolitan importance. The potential for further growth at Lewisham will be supported by the arrival of the Bakerloo line at Lewisham Interchange. This will bring enhanced access to central London and encourage the delivery of employment, leisure, service and community uses that serve the local and sub-regional population. Public realm and environmental enhancements of the town centre and surrounding employment, mixed-use and residential re-developments will continue to be delivered and will assist the continued transformation of Lewisham into a ‘high performing’ and ‘vibrant’ retail hub with excellent leisure services.</p> <p>Mayor of London Adaptive Strategies</p> <p>1.27 The Mayor of London is seeking to grapple with the issue of town centre flexibility having published his ‘Adaptive strategies’¹⁴ for high street renewal in early 2020. The Mayor reminds us that his new London Plan calls for high streets and town centres to adapt and diversify.</p> <p>1.28 The Mayor recognises that London’s town centres are the focal point for our culture, communities and everyday economies. They support the most sustainable models of living and working, including active travel and shorter commutes. The strategy recognises that high streets are so much more than just retail. The guidance supports the implementation of ambitious, innovative and fresh strategies so our high streets and town centres not only adapt and survive but thrive.</p> <p>1.29 Landsec supports the recognition that when it comes to our high streets, London’s communities, businesses and local authorities can show extraordinary levels of enterprise, motivation and commitment to delivering change. In particular Landsec supports the following findings within the Mayor’s report:-</p> <ul style="list-style-type: none"> ▪ There is significant value in London High Streets. Jobs, businesses, other nonresidential uses and the homes we live in are all part of our understanding of the high streets as places. High streets typically have more retail at ground floor facing 		

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							<p>the street, but they support a huge range of uses above and behind, and an interdependent mix of different activities and characteristics. Taken together, these have a multiplier effect in creating value of many types.</p> <ul style="list-style-type: none"> ▪ High streets are about much more than retail. London's high streets serve a wide range of Londoners in multiple and inclusive ways. They are highly social, diverse and accessible spaces. As such, they have a crucial role in supporting social, economic and environmental benefits. Particularly significant is the observation that high streets often cater for groups who are at risk of marginalisation or under-representation. These include the young, the elderly, jobseekers and those with young families. ▪ Whilst high streets appear to be a resilient urban typology in London, this varies widely across the city. For example, in Metropolitan centres, growth in the number of businesses and jobs is much lower than for high streets in general. Some of London's larger centres are seeing a downturn in retail-related jobs and businesses, which is significant by national standards. In the three years from 2015-2017, retail employment in Kingston Metropolitan town centre for example fell by 15 per cent. The Mayor's latest data shows that Croydon town centre has an overall vacancy rate of 22 per cent across all use classes. ▪ The Mayor sees high streets and town centres as good places for residential intensification. This is already being delivered across London, especially outer London, meaning more people will be living on and around high streets. Huge changes are needed. That's why the London Plan supports and encourages the adaptation and restructuring of town centres. This will enable them to take advantage of existing infrastructure and benefit from higher populations of residents. <p>1.30 National policy and the London Plan provide an important policy framework, the conformity of which will apply a rigid backbone to Landsec's proposals.</p> <p>Lewisham - Adopted Development Plan</p> <p>1.31 The adopted Lewisham Town Centre Local Plan (2014) (the 'LTCLP') recognises that Lewisham Shopping Centre will be 'redeveloped over time¹⁵'.</p> <p>1.32 The plan specifically promotes redevelopment of the Leisure Box and Riverdale Hall for commercial uses at ground floor and residential above and supports residential conversion of the Citibank Tower (Lewisham House). It also allocates comprehensive redevelopment of</p>		

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							<p>the Beatties Building and model market to provide retail/restaurants or leisure uses on the ground floor with commercial or residential uses on the upper floors.</p> <p>1.33 Policy LTC8 – S9 Land north of the Lewisham Shopping Centre comprises land to the north east of the Lewisham Shopping Centre, the Citibank Tower and the land surrounding it. It recognises that redevelopment of the site could be in sections or phases. Redevelopment will be encouraged in conjunction with more comprehensive improvements to the Lewisham Shopping Centre to provide retail (A1 – A3) and/or leisure use on the ground floor with commercial, leisure and/or residential use on the upper floors.</p> <p>1.34 Policy LTC8 confirms that more intensive office use or residential conversion of the Citibank Tower would be favourably considered by the Council. Any proposal should include recladding of the building and improved environmental performance. Redevelopment (including taller elements) should respond positively to the Lewisham Gateway development and provide a welcoming and accessible entrance to the centre from Lee High Road.</p> <p>1.35 Policy LTC8 – S10 Land south of the Lewisham Shopping Centre seeks comprehensive redevelopment of the Beatties Building and model market sites to provide retail (A1-A3) or leisure uses on the ground floor with commercial and or residential uses on the upper floors. Redevelopment should mark the beginning of the commercial and retail heart of Lewisham town centre, while respecting the height, mass and bulk of local surroundings. It should create a new southern anchor for Lewisham High Street to encourage customers to travel the full length of the High Street.</p> <p>1.36 Whilst dated, some of the principles established in the 2014 Local Plan remain relevant to the current redevelopment objectives of Landsec.</p>		
CON042	REP200	Quod OBO Landsec			3	LCA 02	<p>1 Lewisham Town Centre Existing Role and Function of Lewisham Town Centre</p> <p>1.1 London comprises two international town centres (West End and Knightsbridge) and 14 Metropolitan Centres.</p> <p>1.2 Geographically Canary Wharf is the closest Metropolitan Centre to Lewisham (one of ten Metropolitan Centres north of the River Thames). South of the Thames there are only 4 Metropolitan Centres (Bromley, Croydon, Sutton</p>	<p>The Council notes the introductory and contextual comments made in relation to the new Local Plan Policy LCA 02 Lewisham major centre and surrounds.</p> <p>The Council notes the respondent's suggestion that the <i>“that wholesale demolition of the Lewisham Shopping Centre (as a first phase) to create a cleared</i></p>	No further actions required in relation to the new Local Plan.

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							<p>and Kingston) which form a crescent south of Lewisham. These centres are illustrated below with Lewisham highlighted in red in Figure 2 below.</p> <p>Figure 1 & 3 - London Plan Figure 2.17 Town Centre Network and London Plan Figure A1.1 – Future Potential Changes to the Town Centre Network</p> <p>1.3 At present, Lewisham is one of 36 centres classified as ‘Major’, albeit the only town centre south of the Thames with the potential for re-classification to Metropolitan, as set out at Figure 3 below. The Royal Borough of Greenwich is not seeking reclassification of Woolwich town centre due to insufficient retail expenditure growth and market share.</p> <p>1.4 Across London, there are other examples of town centre development, albeit none directly comparable to Site 2 at Lewisham. This is because Landsec are seeking to balance the need to develop and invest whilst maintaining operational continuity and limiting disruption to the rest of the associated town centre, whilst redeveloping in the context of reducing retail floorspace needs.</p> <p>1.5 Landsec also do not consider that wholesale demolition of the Lewisham Shopping Centre (as a first phase) to create a cleared site would be the most appropriate solution for Lewisham. It would detrimentally result in more areas of the town centre becoming inactive and redundant for a long period pending development. However, costs are associated with this approach.</p> <div data-bbox="1113 1318 1736 1675">  <p>Town Centre Network</p> <p>Source: GLA Planning Contains OS data © Crown copyright and database right (2017)</p> <p>Future Potential Changes to Town Centre Network</p> <p>Source: GLA Planning Contains OS data © Crown copyright and database right (2017)</p> <p>Legend: International (yellow star), Metropolitan (blue star), Major (green star), District (grey star), CAZ (blue circle)</p> </div> <p>1.6 Stratford, Shepherds Bush and Croydon relied upon large, cleared sites to bring forward a specific retail model by Westfield. Croydon was more complex as it relied upon another landowner (Hammerson) but ultimately failed due</p>	<p><i>site would be the most appropriate solution for Lewisham.”</i> For clarity, the new Local Plan speaks to comprehensive redevelopment, comprised of redevelopment of existing buildings and reconfiguration of spaces to facilitate a street-based layout with new and improved routes through the site. Without entering into semantics, the policy allows for alternatives, to wholesale demolition, to be considered. The Council highlights that our national planning system and the new Local Plan positively seeks to provide flexibility – where it is demonstrably supported by evidence.</p> <p>The subsequent comments relating to the potential re-classification of Lewisham Town Centre as a Metropolitan Centre of sub-regional significance in London are noted. The anecdotal comparisons with other centres across the Capital are noted. The Council remains committed to the continued investment in Lewisham Town Centre to support its reclassification as a Metropolitan Centre – this remains a strategic priority. It is noted that the respondent supports this objective (in other comments).</p> <p>The comments made in relation to existing vacant commercial floorspace (within the Shopping Centre) and the apparent difficulties encountered by the respondent in finding tenants are noted. The Council acknowledges that retail markets are dynamic. It is an established fact that retail markets are challenging in terms of plan-making. For example, it was long-understood that retail needs assessments had relatively short horizons (five-seven years). Within this context the Council favours a cautious approach – this is considered a sound response.</p> <p>The Council understands the possible drivers behind the respondent’s aspirations to maximise the quantum of</p>	

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							<p>to the economic cycle and is now a redundant business model due to on-line shopping. Hammerson also tried to deliver a similar retail model at Brent Cross but this has been in gestation for decades and the focus is now on the delivery of the residential quarter south of the north circular by Argent, similar to the International Quarter at Stratford and White City Living.</p> <p>1.7 Sutton Metropolitan Centre is different to Westfield, albeit like Lewisham has been the subject of a number of individual development plots that comprise tall buildings. Whilst cumulatively they symbolise regeneration and investment, individually the silo applications are unable to contribute significantly to the town centre as they are in different ownerships on very small plots. The St Nicholas Centre freehold has now been purchased by the Council to plan for the rationalisation of surplus floorspace.</p> <p>1.8 Canada Water and Wembley comprise low density retail warehouse and leisure parks with large surface level car parks. Whilst not fully cleared sites like Westfield, they do represent simpler clearly defined phases of development with greater scope for unencumbered development without multiple and layered interests such as those at Lewisham.</p> <p>1.9 The Elephant and Castle development comprises the shopping centre and land beyond it. Unlike Lewisham, the whole shopping centre was first demolished (2021). The site will comprise (Phase 2) Castle Square, a small shopping destination bringing together local traders around a public square (already opened), 485 homes across three towers and a twelve-storey university campus for UAL's London College of Communication.</p> <p>1.10 The London Plan 2021 classifies town centres across London in accordance with their existing role and function, which is determined by the health check criteria that considers the centres' scale, mix of uses, financial performance and accessibility. The definition of Metropolitan and Major Town Centres is set out at paragraph 2.21 and 2.22 of this report. The GLA periodically complete a health check on all town centres across London. The most recent health check dataset was published in 2017.</p> <p>1.11 The health check data is used to monitor the performance of each town centre and also helps to inform the classification of town centres through the application of threshold ranges for several town centre floorspace uses. When a town centre</p>	<p>residential uses within future mixed-use redevelopment options for the site. The Council considers that the new Local Plan's approach towards optimising development capacities, across the full range of mixed uses, is sound. Again, development partners are provided with opportunities to demonstrate an alternative quantum through technical evidence coming through master planning and design-led approaches. Such an approach allows decision-takers to take account of up-to-date technical evidence of market signals.</p> <p>The Council welcomes the positive messages from the respondent in relation to meeting the needs of the Borough's residents and communities – specifically in terms of securing accommodation for specific demographics and providing training/ learning opportunities that support the local economy. The Council remains committed to working with its development and infrastructure delivery partners to meet the needs of residents, communities, and businesses.</p>	

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							<p>meets or exceeds these thresholds then he town centre classification may be reviewed and recommended for promotion or demotion depending on its performance</p> <p>1.12 The town centre classification thresholds are replicated at Table 1 below. These identify various subcategories beyond the headline of at least 100,000m² of retail, leisure and service floorspace set out in the Metropolitan town centre definition of the Annex 1 of the London Plan.</p> <table><caption>Table A2 – Town centre network and future potential network classification thresholds</caption><tr><th></th><th colspan="2">International</th><th colspan="2">Metropolitan</th><th colspan="2">Major</th><th colspan="2">District</th><th colspan="2">CAZ</th></tr><tr><th></th><th>Upper</th><th>Lower</th><th>Upper</th><th>Lower</th><th>Upper</th><th>Lower</th><th>Upper</th><th>Lower</th><th>Upper</th><th>Lower</th></tr><tr><td>All occupied floorspace (sqm)</td><td></td><td>240,000</td><td></td><td>100,000</td><td></td><td>50,000</td><td></td><td>50,000</td><td></td><td>5,000</td></tr><tr><td>All occupied floorspace (sqm) without offices</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>All occupied retail floorspace (sqm)</td><td></td><td>200,000</td><td></td><td>65,000</td><td></td><td>25,000</td><td></td><td>25,000</td><td></td><td>2,500</td></tr><tr><td>All occupied comparison floorspace (sqm)</td><td></td><td>180,000</td><td></td><td>50,000</td><td></td><td>15,000</td><td></td><td>15,000</td><td></td><td>1,000</td></tr><tr><td>Comparison goods retail as a per cent of total retail floorspace</td><td>100</td><td>90</td><td>100</td><td>75</td><td>75</td><td>50</td><td>65</td><td>15</td><td>100</td><td>15</td></tr><tr><td>Convenience goods retail as a per cent of total retail floorspace</td><td>0</td><td>10</td><td>5</td><td>25</td><td>15</td><td>45</td><td>20</td><td>75</td><td>0</td><td>60</td></tr><tr><td>All occupied leisure floorspace (sqm)</td><td></td><td>100,000</td><td></td><td>25,000</td><td></td><td>10,000</td><td></td><td>1,000</td><td></td><td>2,500</td></tr><tr><td>Office floorspace (sqm) - total (B1a) stock at 31.03.2016</td><td></td><td>1,000,000</td><td></td><td>65,000</td><td></td><td>30,000</td><td></td><td>500</td><td></td><td>30,000</td></tr><tr><td>Multiples as a per cent of total floorspace (Multiple + Independent)</td><td>90</td><td>50</td><td>80</td><td>50</td><td>80</td><td>30</td><td>80</td><td>5</td><td>80</td><td>25</td></tr><tr><td>Town centre base employee estimates (no.)</td><td></td><td>9,000</td><td></td><td>5,000</td><td></td><td>1,500</td><td></td><td>100</td><td></td><td>500</td></tr><tr><td>Town centre Workplace Zone employee estimates (no.)</td><td></td><td>20,000</td><td></td><td>10,000</td><td></td><td>4,500</td><td></td><td>700</td><td></td><td>4,000</td></tr><tr><td>Absolute 2016 Zone A Retail Rents (£/sqm)</td><td></td><td>5,000</td><td></td><td>1,500</td><td></td><td>1,000</td><td></td><td>500</td><td></td><td>1,500</td></tr><tr><td>Rents Growth per cent rates 2009-16</td><td></td><td>50</td><td></td><td>5</td><td></td><td>5</td><td></td><td>5</td><td></td><td>5</td></tr><tr><td>Public Transport Accessibility Level (PTAL)</td><td>6b</td><td>6a</td><td>6b</td><td>6a</td><td>6b</td><td>5</td><td>6b</td><td>3</td><td>6b</td><td>6a</td></tr></table> <p>1.13 A review of the 2017 data, as shown at Table 2 below, identifies that Lewisham town centre falls below the total floorspace minimum 100,000m² criteria for a Metropolitan Centre (retail, leisure and service), at c.74,000m².</p> <p>1.14 It is expected that this figure may have reduced over the last five years due to increasing vacancies and recent developments.</p> <p>1.15 Whilst Lewisham performs well against all of the Major town centre thresholds, the town centre does not meet any of the Metropolitan Town Centre criteria as summarised at Table 2 below.</p> <p>Table 2 - Total Floorspace Criteria (m²)</p> <table><tr><th>Classification</th><th>Lewisham Town Centre</th><th>Metropolitan Town Centre Thresholds</th><th>Major Town Centre Thresholds</th></tr><tr><td>Total retail, leisure and service floorspace¹</td><td>74,143</td><td>100,000-239,000</td><td>50,000-99,000</td></tr><tr><td>Retail</td><td>63,952</td><td></td><td></td></tr><tr><td>- Total comparison</td><td>46,232</td><td>50,000-179,000</td><td>15,000-49,999</td></tr><tr><td>- Total convenience</td><td>13,670</td><td></td><td></td></tr><tr><td>- Total service</td><td>4,050</td><td></td><td></td></tr><tr><td>Leisure</td><td>10,191</td><td>25,000-99,000</td><td>10,000-24,999</td></tr><tr><td>Office floorspace (B1a)</td><td>52,649</td><td>65,000-999,999</td><td>30,000-64,999</td></tr></table>		International		Metropolitan		Major		District		CAZ			Upper	Lower	Upper	Lower	Upper	Lower	Upper	Lower	Upper	Lower	All occupied floorspace (sqm)		240,000		100,000		50,000		50,000		5,000	All occupied floorspace (sqm) without offices											All occupied retail floorspace (sqm)		200,000		65,000		25,000		25,000		2,500	All occupied comparison floorspace (sqm)		180,000		50,000		15,000		15,000		1,000	Comparison goods retail as a per cent of total retail floorspace	100	90	100	75	75	50	65	15	100	15	Convenience goods retail as a per cent of total retail floorspace	0	10	5	25	15	45	20	75	0	60	All occupied leisure floorspace (sqm)		100,000		25,000		10,000		1,000		2,500	Office floorspace (sqm) - total (B1a) stock at 31.03.2016		1,000,000		65,000		30,000		500		30,000	Multiples as a per cent of total floorspace (Multiple + Independent)	90	50	80	50	80	30	80	5	80	25	Town centre base employee estimates (no.)		9,000		5,000		1,500		100		500	Town centre Workplace Zone employee estimates (no.)		20,000		10,000		4,500		700		4,000	Absolute 2016 Zone A Retail Rents (£/sqm)		5,000		1,500		1,000		500		1,500	Rents Growth per cent rates 2009-16		50		5		5		5		5	Public Transport Accessibility Level (PTAL)	6b	6a	6b	6a	6b	5	6b	3	6b	6a	Classification	Lewisham Town Centre	Metropolitan Town Centre Thresholds	Major Town Centre Thresholds	Total retail, leisure and service floorspace¹	74,143	100,000-239,000	50,000-99,000	Retail	63,952			- Total comparison	46,232	50,000-179,000	15,000-49,999	- Total convenience	13,670			- Total service	4,050			Leisure	10,191	25,000-99,000	10,000-24,999	Office floorspace (B1a)	52,649	65,000-999,999	30,000-64,999		
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							<p>1.16 Metropolitan centres are characterised as serving a wide catchment that can extend over several London boroughs and into parts of the wider Southeast. To better understand Lewisham’s role within the sub-region, we have considered the classification and floor areas of adjacent town centres in South-East London to understand whether there is likely to be competition from these centres in terms of role and function.</p> <p>Table 3 - Town Centre review for South-East London</p> <table><tr><td>Town Centre</td><td>Lewisham</td><td>Catford</td><td>Peckham</td><td>Woolwich</td><td>Bromley</td></tr><tr><td>Current Designation</td><td>Major</td><td>Major</td><td>Major</td><td>Major</td><td>Metropolitan</td></tr><tr><td>Borough</td><td>Lewisham</td><td>Lewisham</td><td>Southwark</td><td>Greenwich</td><td>Bromley</td></tr><tr><td>Distance from Lewisham</td><td>N/A</td><td>1.8km</td><td>4km</td><td>6.3km</td><td>6.5km</td></tr><tr><td>All occupied floorspace without offices (m²)</td><td>74,143</td><td>41,390</td><td>66,643</td><td>69,146</td><td>143,078</td></tr><tr><td>All occupied retail floorspace (m²)</td><td>63,952</td><td>28,610</td><td>54,734</td><td>48,313</td><td>114,678</td></tr><tr><td>All occupied comparison floorspace (m²)</td><td>46,232</td><td>13,690</td><td>28,440</td><td>27,823</td><td>99,118</td></tr><tr><td>All occupied leisure floorspace (m²)</td><td>10,191</td><td>12,780</td><td>11,900</td><td>20,560</td><td>28,400</td></tr><tr><td>Office floorspace (B1a) (m²)</td><td>52,649</td><td>11,776</td><td>18,000</td><td>71,948</td><td>161,613</td></tr></table> <p>1.17 Table 3 identifies that Peckham and Woolwich town centres are also performing close to the upper thresholds of a Major town centre constraining growth capacity for Lewisham. Woolwich has received significant inward investment as a result of the opening of the Elizabeth Line, albeit is no longer seeking Metropolitan status due to a lack of retail capacity growth evidenced as part of the local plan review.</p> <p>1.18 When considering Woolwich’s potential for growth alongside the likes of Bromley, an established Metropolitan town centre, the ability for Lewisham to serve a wide catchment which can extend over several boroughs and into parts of the Wider Southeast through floorspace alone appears limited.</p> <p>1.19 Spatial improvements (other than the binary metric of floorspace) can however improve town centre vitality and viability as well as the outcomes secured through investment in town centres for jobs, homes, businesses. These improvements can support Lewisham’s role and function as potentially one of the most important centres in south London as it seeks to reinvent itself and compete with the more dominant established Metropolitan Centres to the south, and the growth ambitions of other Major Centres such as Woolwich, Canada Water, and the Elephant and Castle to the north. Yet unclassified centres with potential for classification such as North Greenwich and the Old Kent Road are also</p>	Town Centre	Lewisham	Catford	Peckham	Woolwich	Bromley	Current Designation	Major	Major	Major	Major	Metropolitan	Borough	Lewisham	Lewisham	Southwark	Greenwich	Bromley	Distance from Lewisham	N/A	1.8km	4km	6.3km	6.5km	All occupied floorspace without offices (m²)	74,143	41,390	66,643	69,146	143,078	All occupied retail floorspace (m²)	63,952	28,610	54,734	48,313	114,678	All occupied comparison floorspace (m²)	46,232	13,690	28,440	27,823	99,118	All occupied leisure floorspace (m²)	10,191	12,780	11,900	20,560	28,400	Office floorspace (B1a) (m²)	52,649	11,776	18,000	71,948	161,613		
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							<p>competing with Lewisham and driving growth through redevelopment based around tall building typologies.</p> <p>1.20 Notably the Metropolitan Centres of Shepherds Bush (Westfield London) and Stratford (Westfield Stratford City) achieved their status through the completion of the Westfield shopping centre format. However, as demonstrated recently in Croydon, this format is no longer deliverable in the UK. Westfield has allowed the planning permission in Croydon to lapse and is currently repurposing excess retail floorspace at Stratford and Shepherds Bush.</p> <p>1.21 Principally it was this retail format that Lewisham courted with an eye on Metropolitan status comprising strategically significant increases in retail floorspace (c.40,000m²) which would generate a wide catchment which can extend over several boroughs and into parts of the Wider Southeast. The Quod Technical Report (Appendix 2) Figure 4.1 and Figure 4.2 demonstrates that the catchment is currently more localised and does not yet extend across several boroughs.</p> <p>1.22 The Council has maintained a longstanding aspiration to elevate Lewisham Town Centre to Metropolitan status. The adopted Core Strategy (2011) seeks to promote Lewisham Town Centre to Metropolitan status by 2026. The Reg 19 Plan repeats this vision² and contains policies to deliver Metropolitan status based upon a requirement to achieve considerable growth in comparison retail floor space.</p> <p>1.23 Landsec has stated its ambition to assist the Council in seeking to achieve the potential for Metropolitan status by 2040.</p> <p>1.24 Local Plans should be aspirational. The objectively assessed needs however point to the need for greater flexibility within the Reg 19 Plan, and an adjustment of indicative site capacities in respect of commercial floorspace. Landsec's promotion of greater flexibility also suggests that a broader set of qualitative metrics should be considered.</p> <p>Lewisham Shopping Centre</p> <p>1.25 Lewisham Shopping Centre has been at the heart of the town centre for over 45 years and requires renewal. It was opened in 1977 as the Riverdale Centre, the largest building in Lewisham town centre. The centre comprises shop units set over 3 floors, an 800-space car park, offices, a large internal service area/road set above the shopping centre and a disused leisure and community centre.</p>		

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							<p>1.26 The disused leisure centre has been closed for at least 23 years and offered sports facilities such as gymnastics, a five-a-side football, and badminton as well as an indoor bowls court, bar area and function rooms. On the ground floor was the Riverdale Hall which hosted a variety of events.</p> <p>1.27 The design of the shopping centre (as a covered mall) results in full site coverage by a single building with 100% plot ratio. This offers limited opportunities for permeability and urban greening. It is an inclusive and enclosed environment solely reliant on retail occupancy and customer footfall to generate vitality and vibrancy. Without sustained long term retail occupancy, there is no reason for the local community to visit the centre and it could have an adverse impact on vitality and viability of Lewisham as a whole.</p> <p>1.28 Landsec has sought to keep the centre as occupied as possible however this has its challenges due to the restructuring of the retail sector and in the long term is not a sustainable solution for Lewisham Town Centre. Covid has created a greater issue by accelerating the structural change in retail, and through the loss of many high street retailers has removed current and future tenants. There simply are not the quantity and quality of tenants available to occupy the floorspace in a way which benefits the town centre in the long term.</p> <p>Vacant Floorspace</p> <p>1.29 Lewisham Shopping Centre comprises c.36,000m² (GIA) of floorspace of which around 15,000m² (GIA) is vacant or subject to short term lets pending redevelopment. 70% of the floorspace is at ground floor, with 30% at first or second floor. Most of the centre is in retail use, with only a very limited food and beverage offering.</p> <p>1.30 In addition, there is also c.6,800m² of vacant space as part of the wider estate. This comprises the former leisure centre (c.4,500m²) and the former Riverdale Hall (c.1,700m²) both of which are disused and have been vacant for many years. Adjacent, the longstanding vacancy of Lewisham House, which itself extends to some 12,100m² adds to the overwhelming sense of an oversupply of unrequired floorspace.</p> <p>1.31 Within the wider Site Allocation 2 boundary, there is around 31,500m² (GIA) of floorspace of which around 7,000m² (GIA) is vacant.</p>		

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							<p>1.32 Landsec has undertaken an assessment of the floorspace and use of that floorspace in Site Allocation 2, the key findings of which are summarised below:-</p> <ul style="list-style-type: none"> ▪ There is 85,480m² of existing floorspace across Site Allocation 2. ▪ Of this area the Landsec ownership comprises 58%, and third-party land 42%. ▪ 35% of Site Allocation 2 is vacant, 5% short term lets (combined 34,131m²), and 60% let. ▪ 34% of Landsec ownership in Site Allocation 2 is vacant and subject to short term lets pending redevelopment. ▪ 49% of 3rd party land (17,613m²) in Site Allocation 2 is vacant. ▪ Of the 32,713m² of existing floor space in Lewisham shopping Centre, 14,612m² (45%) is vacant or subject to short term lets. ▪ Site Allocation 2 comprises 59% retail floorspace; 21% unclassified/other; 7% office; 5% storage; 3% gym; 3% food and beverage; 2% culture and 1% community. <p>Improving vitality and viability</p> <p>1.33 It is our opinion that consolidation of town centre floorspace, and particularly long-term vacancy is a pro-active planning tool to foster enhanced vitality and viability. It is a constructive approach to the vitality and viability of the town centre which we believe the Council should embrace.</p> <p>1.34 Lewisham town centre lacks diversity. This is reflected by the retail-dominated offer and the lack of evening economy and dwell time in the centre. For example, our household survey identifies a notable drop off in town centre restaurant / café use between the daytime and evening – by 35%.</p> <p>Employment and Job Density</p> <p>1.35 The challenge in Lewisham is acute. It is the local authority with the lowest job density in London with only 0.4 jobs per resident. Overall employment has decreased since by -6% since 2015 compared to growth (4%) in London. Retail employment in Lewisham has flatlined over this period.</p> <p>1.36 A new approach is therefore needed to support employment in the borough – and in particular in the town centre. This cannot rely on the continuation of a retail model that is outdated and declining. The counterfactual for the shopping centre, and indeed for the wider town centre, is not a continuation of the current snapshot. It is continued decline in employment.</p>		

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							<p>1.37 Landsec recognise this issue and believe that it is appropriate to consider alternative ways of achieving potential Metropolitan status. The London Plan identifies that the ‘potential’ for Lewisham to become a town centre of Metropolitan importance is linked to its function and population. Significantly, the London Plan does not explicitly refer to the need for additional floorspace, but the creation of a ‘high performing’ and ‘vibrant’ retail hub. Within this context, we consider that the Council should align itself with the qualitative growth aspirations.</p> <p>Capturing a higher proportion of spend</p> <p>1.37 The role and function of town centres is changing – the redevelopment of the shopping centre is an opportunity to move away from oversized big box retail which trades below company averages³ and long-term vacancies to provide a mix of town centre uses that meet a local need, and with the aesthetic attractiveness to draw consumers in from a wider catchment.</p> <p>1.38 This means capturing more of what people spend in person – including importantly on leisure, food and beverage (F&B) and the evening economy and creating a destination. There is comparatively little nighttime economy floorspace in Lewisham town centre, with no hotels or theatres, limited F&B and an overprovision of hot food takeaways. Catford has more floorspace to support its night time economy than Lewisham.</p> <p>1.39 It also means capturing higher spending visitors / trips. Major centres with smaller consolidated floorspace achieve higher turnover per ft² than Metropolitan centres. The development of the shopping centre is an opportunity to provide a mix of uses that support the transformation of Lewisham into a high performing and vibrant retail hub. It is the performance of retail space and the vibrancy of the town centre that should inform the future plans for the town centre, not simply the quantum of floorspace.</p> <p>Expand and Diversify the Catchment</p> <p>1.40 Proposals which include a range of living formats including build to rent, student accommodation and traditional homes including a range of apartment types at a location well served by public transport and cycle networks are likely to attract young, mobile households who will spend money in the town centre, particularly if the town centre offer is diversified and improved.</p>		

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							<p>1.41 A report by the GLA 'More Residents, more jobs' (2015 update) found that 17 jobs were supported in the local area for every 100 residents. This would mean that 2,500 homes (excluding student accommodation) would support 850 jobs in the local area – ranging from teachers and health workers to people working in retail and leisure.</p> <p>1.42 The provision of student accommodation represents an opportunity to support the demand for a wider variety of amenity and leisure uses and help animate the town centre in the evening. While student income is generally low, student spending is not – and it tends to be a disproportionately local and on a range of amenities. It also helps to forge links between education and employment opportunities (which is considered in more context below).</p> <p>Provide a Range of Job Opportunities</p> <p>1.43 The redevelopment proposals promoted by the local plan include retail, leisure, community and office / workspace. Early proposed estimates suggest that there could be up to 1,700 full time equivalent jobs onsite – which could account for 2,300 jobs once part time working is taken into account. This would include entry level job opportunities (for example in the retail space) as well as space for small businesses to grow.</p> <p>1.44 Landsec is committed to ensuring that the benefits of these jobs are maximised for the local community, and has conducted a local needs assessment, which highlighted the following:</p> <ul style="list-style-type: none"> ▪ A need to support the (growing) younger population - the number of young people Not in Employment, Education or Training (NEET) in Lewisham is 54% higher than the London average (Department for Education, 2021) ▪ High unemployment amongst ethnic minorities (higher in Lewisham compared with the London average) ▪ Mental health is an area of need, with suicide rates (Public Health England, 2018-2020) and the rate of claimants with mental and behavioral disorders (ONS, 2020), both greater in Lewisham than in London as a whole. ▪ Supporting people impacted by Covid-19 is a priority, especially given the high claimant count (ONS, 2021) <p>1.45 The development of the shopping centre is an opportunity to provide a sustainable mix of uses to ensure that the vibrancy of the town centre, and the jobs it supports, is maintained.</p>		

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							<p>1.46 Landsec is already working to support young people in Lewisham through their existing partnerships with Construction Youth Trust and Circle Collective. They provide support such as donated resources, funding and volunteer time.</p> <p>1.47 Landsec is working with Circle Collective to bring young people into the planning process for Lewisham Shopping Centre through their programme, Voice Opportunity Power which supports young people to have a voice in forums where they typically would not be present.</p> <p>1.48 Landsec has supported Construction Youth Trust through funding to create a hub in Lewisham that has allowed the organisation to support four schools in the borough. Construction Youth Trust are working with these schools to provide curriculum support and help young people access meaningful employer engagement, work experience, site visits and practical sessions.</p> <p>1.49 The construction phase of the project is likely to support significant jobs over a long period of time. Landsec will continue support Construction Youth Trust through construction to achieve its targets which are set out below:</p> <ul style="list-style-type: none"> ▪ Creating apprenticeships (1-2 weeks per every 1 FTE employed) ▪ 3-5% of construction workforce being people Not in Employment, Education or Training ▪ Targets will also be set around paid and unpaid work placements, local school engagement, site visits and career advice <p>1.50 Landsec is also committed to supporting local people throughout the development lifecycle with their targets:</p> <ul style="list-style-type: none"> ▪ All jobs to be advertised locally 7 days prior to general advertisement in construction and new management employment opportunities in-use ▪ 30%+ of all new jobs created to be targeted for local people through construction and inuse ▪ Recruitment programmes to support those who are long-term unemployed or been impacted by the Covid-19 pandemic <p>1.51 Landsec is committed to supporting the local economy in Lewisham through the construction and in-use stages of the development. Currently, Landsec already provide</p>		

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							<p>support to social enterprises such as Circle Collective as well as free donated space to charities such as the Migration Museum. Landsec is committed to continuing this legacy through initiatives such as:</p> <ul style="list-style-type: none"> ▪ 50% local spend in construction and 50% spend in management supply chain in-use ▪ 10-20% of local spend with SMEs through construction and in-use ▪ Targets will also be set for Landsec and its delivery partners around providing expert business advice locally ▪ Landsec will also commit to a 15% social value weighting in the procurement of its delivery partners <p>1.52 Landsec will also support community programmes to support a healthier and safer community in Lewisham:</p> <ul style="list-style-type: none"> ▪ Supporting mental and physical health programmes through its workforce and supply chain ▪ Providing investment and volunteer time to organisations that promote health and wellbeing in Lewisham such as: Lewisham Compass @ The Hub, Lewisham Community Wellbeing, Cycle Confident, Ageing Well in Lewisham and Age Exchanges <p>1.53 These initiatives represent long term economic benefits for Lewisham Town Centre and form part of the employment initiatives to achieve Metropolitan status.3</p>		
CON043	REP201	Knight Frank OBO Lewisham House No.1			3	LCA SA 02	<p>On behalf of Lewisham House No.1 Limited (Guernsey) (hereinafter 'the Client'), Knight Frank hereby submit representations in respect of the Regulation 19 Consultation on the Lewisham Local Plan Proposed Submission Document (dated January 2023), which is running from 1 March 2023 to 25 April 2023. The London Borough of Lewisham ('LBL') commenced a review of their Local Plan in late 2015, with a consultation on the main issues for the Plan. LBL subsequently undertook a Regulation 18 Consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document (the Draft Local Plan) which ran from January to April 2021. It is understood that representations made to the Regulation 18 Consultation have informed the content in the Regulation 19 Local Plan Proposed Submission Document. The Client have a major land interest in the borough as owners of Lewisham House, 25 Molesworth Street, SE13 7EP (hereinafter 'the Site'), which will be affected by the policies and allocations contained within the new Lewisham Local Plan.</p>	<p>The Council notes and welcomes the support offered in relation to the new Local Plan and the site allocation identified under new Local Plan Policy LCA SA 02 Lewisham Shopping Centre.</p> <p>The Council notes the overview of national planning policy provided in the respondent's comments.</p>	No further actions required in relation to the new Local Plan.

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							<p>The Client supports the preparation of the Lewisham Local Plan Review and the allocation of the Site within the Plan for comprehensive mixed-use redevelopment. Notwithstanding, it is considered that in its current form the draft Local Plan would not be legally compliant or sound. Within this representation we provide comments on a range of draft policies against the tests of soundness, and where necessary, make specific reference to our Client's Site.</p> <p>The Site Lewisham House is currently vacant but was last in use as an office (Use Class E(g)). The Site is situated within Lewisham Major Centre and is an underutilised and brownfield site in a highly sustainable location. The Site is suitable, available and deliverable within the first 5 years of the Plan period. The Site has been subject to several prior approval applications in recent years. Prior approval (submitted under Schedule 2, Part 3, Class O) was granted on 28 March 2018 (Ref. DC/17/105087) for the change of use from office use to residential (Use Class C3) to create 237 units. The prior approval was not implemented. A subsequent prior approval application (Ref. DC/21/120369) was granted on 17 May 2021 for the change of use from office to residential (Use Class C3) to create 219 units with 322 cycle spaces and subject to a unilateral agreement. The Site forms part of the Lewisham Shopping Centre site allocation under the provisions of the Regulation 19 Proposed Submission Document. It is in this context that the Client submits this representation.</p> <p>The Client wishes to ensure that the Lewisham Local Plan, which will shape the future of the Borough and the regeneration of the Lewisham Shopping Centre site, is robust, flexible, and capable of responding to future economic and demographic changes. Regulation 19 Proposed Submission Document Paragraph 35 of the National Planning Policy Framework ('NPPF') which the Local Plan will be considered against requires that any Plan submitted to the Secretary of State for Examination must be capable of being found both legally compliant and sound. This places various duties on the Council including, but not limited to, ensuring the Plan is:</p> <ul style="list-style-type: none"> • Positively prepared – seeking to meet objectively assessed needs, including unmet needs from neighbouring areas where it is practical to do so; • Justified – an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence; • Effective – deliverable over its period and based on effective joint working on cross-boundary strategic matters; and 		

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							<ul style="list-style-type: none"> Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework. If the Lewisham Local Plan Proposed Submission Document fails to accord with any of the above requirements, it is incapable of complying with the NPPF, which as a result of Section 19 of the Planning and Compulsory Act 2004, is a legal requirement. 		
CON043	REP202	Knight Frank OBO Lewisham House No.1			1	OL 1	<p>Part 1: Planning for an Open Lewisham The Council sets out an overarching strategic objective for “An Open Lewisham as Part of an Open London” over the Plan period, which is then supported by nine themed topic areas. Within these nine themed areas, numerous objectives have been set out. For example, Strategic Objective B ‘Housing tailored to the community with genuinely affordable homes’ aims to ensure Lewisham’s existing and future residents benefit from good access to a wide range and mix of high quality housing, including the needs of those from all age groups and at different stages of life. Objective F ‘Celebrating our Local Identity’ seeks to make the optimal use of land and facilitate the regeneration and renewal of localities within the London Plan Opportunity Areas. Objective G ‘Healthy and Safe Communities’ aims to promote cohesive and mixed communities along with walkable and liveable neighbourhoods by ensuring development is carefully integrated and designed to secure high quality, legible and permeable spaces that are inclusive’. Policy OL1 (Delivering an open Lewisham (Spatial Strategy)) and Figure 3.3 sets out those locations to which new development and investment will be directed.</p> <p>The Client agrees with and acknowledges the importance of the abovementioned objectives and is well placed to assist LBL in their delivery. The Client’s Site is an underutilised, brownfield site in a town centre location. Furthermore, Figure 3.3 identifies Lewisham Major Centre (including the Site) as a Regeneration Node. Overall, the Council’s strategic objectives and Spatial Strategy, including the continued focus on making the optimal use of land, providing a wide range of housing, and facilitating regeneration, is supported.</p>	The Council notes and welcomes the supportive comments made in relation to the new Local Plan Policy OL 1 Delivering an Open Lewisham (spatial strategy), and the associated Table 3.2 Lewisham Local Plan Strategic Objectives and Table 3.3 Borough-wide Spatial Strategy Plan.	No further actions required in relation to the new Local Plan.
CON043	REP203	Knight Frank OBO Lewisham House No.1			2	QD4	<p>High Quality Design</p> <p>The Council continues to promote the delivery of high-quality design throughout the Borough. Policy QD1 (Delivering high quality design in Lewisham) requires development proposals to follow a design-led approach to determine the most appropriate form of development that responds positively to the local context.</p> <p>Policy QD4 (Building heights) and Figure 5.1 (Tall buildings suitability plan) sets out areas where tall buildings are</p>	The Council notes and welcomes the broad support made in relation to the new Local Plan Policies QD, and specifically QD4. The Council emphasises that the new Local Plan policy approach towards building height was developed in close partnership with the greater London Authority and is in accordance and conformity with the London Plan. The Council considers this approach to be sound.	No further actions required in relation to the new Local Plan.

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							<p>considered acceptable in principle, in accordance with London Plan Policy D9 (Tall buildings).</p> <p>Policy QD4 Part C stated that in Lewisham Town Centre, the maximum height of buildings shall not normally be more than 16 – 35 storeys. It is acknowledged that this has been amended since the September 2022 version of the Regulation 19 Proposed Submission Document, which stated normal maximum heights of 25 – 35 storeys. It is understood that the analysis contained within the Tall Building Review Background Paper (2023) informed this revision - the analysis within which applied an ‘additional level of scrutiny’ to that utilised by Allies and Morrison in the 2022 Tall Building Study Addendum. The need to impose thresholds is understood, however extending the range to incorporate lower building heights should not prejudice development coming forward at the upper limits where it has been demonstrated that a site can accommodate such heights.</p>	<p>The Council notes the comments made in relation to QD 4 C and the range of building heights identified within places that are suitable for tall buildings. These places are broadly defined by the new Local Plan under Figure 5.1. The policy approach to this matter is that the decision-taking process, through master planning, provides additional detail on suitability and capacity of places and sites to accommodate tall buildings. It does not prejudice proposals for tall buildings coming forward for positive consideration where the evidence is supportive. The Council contends that this is a sound approach that will secure quality design and good place-making.</p>	
CON043	REP204	<p>Knight Frank</p> <p>OBO</p> <p>Lewisham House No.1</p>			2	DM3	<p>The Client suggests that additional Representations to Regulation 19 Proposed Submission Document Consultation of the Lewisham Local Plan Review. Page 3 text is provided to ensure the policy is suitably flexible and allows proposals to utilise the design-led approach to optimise site capacity. Part F states that tall buildings must be delivered through a masterplan process, and refers to Policy DM3 (Masterplans and comprehensive development).</p> <p>Policy DM3 Part A states that development proposals must be accompanied by a site masterplan where they form all or part of a site allocation. Furthermore, policy DM3 Part B requires masterplans to comprise of: an assessment of the site and its context; a detailed site-wide masterplan that responds positively to the spatial strategy for the Borough, site specific development principles and guidelines, and other relevant planning policies; and a delivery strategy that identifies how the development will be implemented and managed over its lifetime.</p> <p>The Client acknowledges and agrees that tall buildings require detailed design scrutiny, as set by the London Plan policy requirements (paragraph 3.9.4). However, it is contended that it is possible to do so without necessitating a formal masterplan. The criteria set out in Policy DM3 Part B can be satisfied through a detailed planning application process and submission, and requiring a masterplan for detail which can be provided through the application process is likely to result in significant delays to the timely delivery of development. It is therefore considered that the requirement for a masterplan is</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy DM 3 Masterplans and comprehensive development.</p> <p>Master planning is an established mechanism for securing good design and successful place-making. It is widely acknowledged by development industry partners as an integral part of decision process deployed for considering large and sensitive proposals. In contrast to this representation, development industry partners are broadly supportive of this approach.</p> <p>Master planning at the start of decision-taking provides a sound, transparent and logical approach to the process. It is noted today that most development rarely come in as “full” applications; with even the largest strategic urban extensions being submitted as detailed outline applications that are then subject to further reserved matters proposals. Within that context, the preparation of a master plan at an early stage provides a logical and sound approach – which does not in any way disadvantage the developer in terms of time or cost.</p>	No further actions required in relation to the new Local Plan.

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							onerous and not fully justified. Furthermore, the nature of the masterplan being requested is unclear. What status would the masterplan need to have? For example, is the intention an informal masterplan discussed with the Council, or a formally approved masterplan adopted as an SPD or alternatively an outline planning application? The lack of clarity is a significant concern, and as per the above reasons, we do not think a masterplan approach to sites comprising tall buildings is necessary or justified. It is suggested that the Council amend Policy QD4 either to wholly remove the requirement for a masterplan, or to provide greater clarity on what a masterplan approach would consist of.		
CON043	REP205	Knight Frank OBO Lewisham House No.1			2	QD6	<p>Policy QD6 (Optimising site capacity) requires development proposals to use the design-led approach to make the best use of land and optimise the capacity of a site. Part B adds that proposals should have regard to factors such as the type and nature of the use proposed, and the context of the site with reference to the immediate and surrounding area. Finally, Part C states that where development proposals do not accord with the indicative capacity of a site allocation, they will only be supported where it is clearly demonstrated that optimal capacity will be achieved.</p> <p>The focus on optimising site capacity is supported, and aligns with London Plan Policy D3 (Optimising site capacity through the design led approach). LBL Policy should acknowledge, however, that the capacity outlined in site allocations is indicative and has not been informed by detailed analysis of individual parcels of land within an allocation. For mixed use allocations, in particular, capacity will depend on the land use coming forward on specific parcels of land.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD6 Optimising Site Capacity. The Council welcomes the support offered in relation to the policy's focus on optimising site capacity.</p> <p>The Council notes the suggestion that the policy be amended to note that the development capacities identified for the Local Plan site allocations are indicative. The Council acknowledges that this is the case, and the site allocations policies make this clear. For further clarity, Policy QD6 is a general planning policy and as such relates to speculative development proposal in addition to those coming forward on site allocations. Consequently, it is logical that it speaks in general terms – particularly as the site allocation policies are clear on this matter. For these reasons, the Council considers the policy to be sound.</p>	No further actions required in relation to the new Local Plan.
CON043	REP206	Knight Frank OBO Lewisham House No.1			2	HO 7	<p>Housing Policy HO7 (Purpose built student accommodation) Part A states that development proposals for Purpose Built Student Accommodation ('PBSA') will be supported where it helps to meet an identified need – taking into account the amount of PBSA within an area, and the proportion of PBSA provided in relation to the overall mix of housing within a development, relevant masterplan, or site allocation.</p> <p>The Client requests clarity regarding 'proportion of overall housing mix within a site allocation', to ensure that the development potential of their Site would not be prejudiced as a consequence of what may or may not come forward on the remainder of the site allocation – which is in different</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy HO 7 Purpose built student accommodation.</p> <p>The Council notes and welcomes the broad support expressed in the representation in relation to number of specific elements of Policy HO 7. In terms of the statement relating to site allocations involving multiple landownerships, it is entirely reasonable for the Council to encourage and seek discussion and understanding as part of the decision-taking process. The</p>	No further actions required in relation to the new Local Plan.

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							<p>ownership and thus out of their control. The Client agrees that PBSA provision should contribute to mixed and inclusive neighbourhoods, as per London Plan Policy H15 (Purpose-built student accommodation). However as currently worded, the policy assumes landowners within site allocations are aligned in their approach and aware of the development intentions of each other. This is not always the case and therefore this draft policy would necessitate landowners to make assumptions on forthcoming development. The policy as currently drafted would be difficult to enforce and ineffective.</p> <p>The Council should also consider as part of applications the proportion of students living in the borough at the point an application is made, and as projected into the future. The implications of the increasing numbers of students living in general housing stock should be considered and balanced against the benefits of providing PBSA as part of the wider housing stock. PBSA has an important role to play in building capacity into the housing market, with each 2.5 beds accounting for 1 home. Part B states that PBSA should be appropriately located, including at well-connected sites and within or at the edge of town centres. This is supported and aligns with part B of London Plan Policy H15 which encourages Boroughs to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.</p> <p>Part C states that PBSA must be of a high quality design and give particular consideration to (inter alia): adequate functional living space and layout, with a recommended benchmark of 1 sqm of internal and 1 sqm of external communal amenity space per student bed; inclusive and safe design; and amenity of occupiers and neighbours. The Client supports the focus on providing high quality PBSA, however it is suggested that the Council avoid being overly prescriptive in their requirements – particularly as retrofitting / change of use developments to provide PBSA are unlikely to be able to provide the specified amount of external amenity space. Given the increasing focus on retrofitting over redevelopment, buildings should not be prejudiced where they are unable to meet such amenity requirements, and policy should reflect that conversions are not always able to meet the same standards as new builds. Furthermore, PBSA products must evolve to changing market demand and student requirements, and therefore overly prescriptive policies limit future flexibility.</p>	<p>application of the master- planning approach, possibly in conjunction with planning performance agreements (or other mechanisms) provides an effective process for achieving this objective. It is reasonable for the Council to assume that landowners/ developers can talk to one another to agree approaches for meeting their shared objectives. It is unclear why this should not be possible.</p> <p>For clarity, the housing market area for purpose-built student accommodation is London—wide. The Council acknowledges that the provision of additional accommodation may impact on other sources of student housing supply – such as Homes in Multiple Occupation. However, evidence clearly demonstrates that when such sources are released, they tend to re-align to fill other housing needs – such as providing a form of available “inexpensive” accommodation – rather than returning as “normal” market housing.</p> <p>In respect of the comments about the requirement that new student accommodation meet the new Local Plan’s requirements for high quality design and place-making, it is unclear why the respondent believes this unsound. The Council questions whether the respondent for some reason considers that the occupants of student accommodation should not benefit from good quality places and high-quality design. The Council highlights that these are key components of successful place-making and sustainable-development – which is inclusive of student accommodation. The Council notes that all places (and development proposals – including market housing) - are subject to evolutionary change over their lifespan; that does not in any way invalidate the requirement that they aspire and achieve high-quality design.</p>	

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							<p>Overall, the Client supports a positive policy encouraging the provision of PBSA. However, for the reasons discussed above it is considered that the Policy as currently worded is not yet compliant.</p> <p>The Policy should be updated to acknowledge that developments within a site allocation or masterplan area will not be prejudiced where the development intentions of the other landowners are not known. Furthermore, more flexibility is required regarding provision of amenity space – particularly in the case of change of use / retrofit. The Council should insert text acknowledging that the recommended benchmark is targeted more toward new build developments and acknowledge that it will not always be possible for conversions to meet such a benchmark.</p>	<p>The Council acknowledges that future proposals for student accommodation may involve the retrofitting of existing buildings and structures, and that process may require the application of a flexible approach to this matter. Such compromises are an acknowledged part of the development management process but are not in themselves any justification for poor place-making. Such compromises will be managed through the development decision-taking process - as a starting point the Council will seek to achieve the highest design quality including benchmarked amenity space.</p>	
CON043	REP207	<p>Knight Frank</p> <p>OBO</p> <p>Lewisham House No.1</p>			2	HO8	<p>Policy HO8 (Housing with shared facilities (Houses in Multiple Occupation) part D states that development proposals for large-scale purpose-built shared living accommodation will only be permitted subject to certain criteria. The criteria includes (inter alia): meeting an identified local market demand for the type of housing proposed; well integrated provision of communal facilities and services; the development to be under single management; and all units are available to rent, with minimum tenancy lengths of no less than 3 months. This policy is broadly supported and it is noted that most of these criteria are reflective of London Plan Policy H16 (Large-scale purpose-built shared living). However, more clarity is required on the requirement for developments to ‘meet an identified local market demand for the type of housing proposed’.</p> <p>Supporting paragraph 7.75 adds that “Applicants will be required to submit robust evidence of market demand in the Borough for the type of provision proposed, along with evidence to demonstrate that the development will not result in a proliferation of purpose-built shared living. Shared living developments are not restricted to particular groups by occupation or specific needs, and instead provide an alternative to traditional flat shares. It is therefore not clear what type of marketing report would evidence this demand, as population cohorts such as traditional renters may wish to utilise shared living developments. The policy as worded is not robust or effective and should therefore be updated to clarify the nature of evidence required.</p>	<p>The Council notes the comments and broad level of support offered in relation to the new Local Plan Policy HO 8 Housing with shared facilities (Houses in Multiple Occupation).</p> <p>The Council notes that this is a significant housing issue for the Borough and that the Policy plays an important role in managing the scale and impact of provision.</p> <p>For clarity, genuinely affordable and conventional market housing comprise the two highest areas of demand in Lewisham. Consequently, the Council consider it entirely correct and legitimate that decision-takers be provided with evidence that justifies other forms of housing – including that in multiple occupation.</p> <p>For clarity, both the London-wide and Borough Strategic Housing Market Assessments provide development industry partners with a sound baseline for assessing demand. The Council considers it reasonable that proposals for large-scale shared accommodation be justified. This approach provides development industry partners flexibility to demonstrate and justify such proposals – this is considered sound.</p>	<p>Subject to it being demonstrated as being necessary for the purpose of soundness, the Council could consider a modification that provides a specification of the of evidence required to support proposals for large-scale shared accommodation.</p> <p>Suggest amendments to Paragraph 7.75 – “...Applicants will be required to submit robust evidence of market demand in the Borough for the type of provision proposed, along with evidence to demonstrate that the development will not result in a proliferation of purpose-built shared living in the Borough. The required evidence will comprise...”</p> <p>The modified paragraph will need to include a specification of the evidence required to support this application – to be agreed through the examination process.</p>

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								The Council notes the comments seeking clarification on the nature of evidence required to support proposals for large-scale shared accommodation. Should this be considered a matter of soundness could consider a modification to address this request.	
CON043	REP208	Knight Frank OBO Lewisham House No.1			2	EC2	<p>Economy and culture Policy EC2 (Protecting employment land and delivering new workspace) sets out areas where employment land is safeguarded and encouraged to be delivered, in line with Lewisham’s Employment Land Hierarchy. Figure 8.1 and Table 8.1 specify these locations. It is noted that much of this land is concentrated towards the northernmost part of the Borough, with sporadic Locally Significant Industrial Sites (LSIS) located elsewhere, and one Strategic Industrial Location (SIL) located immediately north of Bellingham Station. The locations are not interrelated, and the sporadic locations do not facilitate comprehensive employment areas. It is acknowledged that part B(c) seeks to maximise opportunities to deliver new and enhanced workspace, including through appropriate mixed-use development in town and edge-of-centre locations and non-designated employment sites.</p> <p>Part C states that outside of designated employment areas the appropriateness for new employment uses will be assessed having regard to the nature and scale of the development, and additional criteria such as the compatibility with neighbouring land uses and compliance with other Local Plan policies. Encouraging the delivery of mixed-use development in highly accessible locations is supported, however this is not currently reflected in Figure 8.1 or Table 8.1 – it is suggested that these Figures should be updated, or new Figures provided, to reflect that town centre and well-located sites are also suitable for employment uses as part of regeneration and mixed use development. However, exclusive focus on providing ‘appropriate mixed use development’ is not suitably flexible, particularly with regard to change of use applications which cannot easily facilitate mixed use schemes. As noted above, the direction of travel is to reuse and repurpose existing buildings and so policy must be written in a way which accounts for this.</p> <p>We suggest Policy EC2 part B is amended to include a subpoint supporting change of use to provide employment floorspace in appropriate locations. The policy also does not consider the loss of office, and it is therefore unclear whether existing office space is safeguarded under the provisions of the draft Regulation 19 Proposed Submission Document.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC2 Protecting employment land and delivering new workspace.</p> <p>The Council acknowledges that the Borough’s employment land is concentrated to the north. This reflects Lewisham’s historic development pattern, which is characterised by concentrations of employment uses adjacent to and south of the docks and wharves of the River Thames. For clarity, much of the Borough south of New Cross, can be characterised in townscape terms as Victorian suburb. That is a fact. The opportunities for securing deliverable and developable sites for entirely new large-scale employment provision, as opposed to the redevelopment of existing provision, are limited. That is also a fact. Consequently, the Council concludes that the approach taken through the new Local Plan is sound.</p> <p>For clarity, the new Local Plan addresses the management and future place-shaping of the Borough’s towns centres through Policies EC11, EC12 and EC13. The latter policy seeks to manage future development proposals within town centres – inclusive of the delivery of mixed uses. Contrary to the comments the policy approach is flexible and allows development industry partners with the opportunity to assess and explore the available options as part of the decision-taking process. The suggestion that proposals for changes of use cannot support mixed uses is unjustified. It is unclear from the representation the</p>	No further actions required in relation to the new Local Plan.

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							As further discussed below, Policy LCA2 Part J seeks retention of existing workspace in Lewisham Major Centre, however this is not acknowledged in Policy EC2. It is suggested that the wording is updated to ensure clarity and consistency.	reasons why such schemes could not accommodate a mix of uses. For clarity, the new Local Plan addresses the management and future place-shaping of the Borough's major centres through Policy EC14. This seeks to manage future development proposals. This policy applies across the Borough – inclusive of the site allocations.	
CON043	REP209	Knight Frank OBO Lewisham House No.1			2	EC11	Policy EC11 (Town centres at the heart of our communities) states that town centres are and should remain at the heart of Lewisham's neighbourhoods and communities. Part B states that development proposals should support and help to secure the long-term viability and vitality, for example through optimising the use of land and by delivering an appropriate mix and balance of residential and main town centre uses.	The Council notes the statement made in relation to the new Local Plan Policy EC11 Town centres at the heart of our communities.	No further actions required in relation to the new Local Plan.
CON043	REP210	Knight Frank OBO Lewisham House No.1			2	EC12	Policy EC12 (Town centre network and hierarchy) promotes a town centre first approach. Part A states that development proposals must support and reinforce Lewisham's town centre network and hierarchy and Part B confirms that a 'town centres first' approach will be used to assess development proposals for main town centre uses, in line with the London Plan and the NPPF.	The Council notes the statement made in relation to the new Local Plan Policy EC12 Town centre network and hierarchy.	No further actions required in relation to the new Local Plan.
CON043	REP211	Knight Frank OBO Lewisham House No.1			2	EC13	Finally, Policy EC13 (Optimising the use of town centre land and floorspace) states that development proposals should optimise the use of land by delivering new mixed-use schemes on individual sites, and through comprehensive redevelopment of multiple sites and investigating opportunities for the reuse and reconfiguration of existing space. The town centre first approach is supported and aligns with London Plan policy and the NPPF. The Client recognises the benefits of delivering high-quality development in sustainable, town centre locations. Through their major land interest in Lewisham, the Client is well placed to assist the Council in delivering the aspirations of these policies – through the redevelopment/change of use of an underutilised, allocated brownfield site in a town centre location. The Client looks forward to working proactively with the Council to ensure such aspirations are met.	The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy EC13 Optimising the use of town centre land and floorspace. The Council remains committed to working with its development industry partners to secure and deliver the planned-for growth identified and managed through the new Local Plan.	No further actions required in relation to the new Local Plan.
CON043	REP212	Knight Frank OBO Lewisham House No.1			2	SD2	Policy SD2 (Sustainable design and retrofitting) part D states that the use of sustainable retrofitting measures will be encouraged and supported. Part E and F specify that proposals for major residential domestic refurbishment and major nonresidential refurbishment much achieve a certified 'Excellent' BREEAM rating, unless it can be demonstrated that	The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy SD 2 Sustainable design and retrofitting.	No further actions required in relation to the new Local Plan.

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							this is not feasible. The Client welcomes the acknowledgement of the sustainability benefits of retrofitting.		
CON043	REP213	Knight Frank OBO Lewisham House No.1			3	LCA 2	<p>Part 3 – Lewisham’s Neighbourhoods and Places (Lewisham’s Central Area) The Client supports the principles of Policy LCA1 (Central Area place principles) and Policy LCA2 (Lewisham major centre and surrounds) which encourage the continued investment in Lewisham Major Centre to enable its future designation as a Metropolitan Centre.</p> <p>Policy LCA2 part E requires development proposals to be designed to improve access and permeability in the town centre and its surrounding area, particularly where sites are to be delivered through comprehensive redevelopment. This includes new or enhanced east-west routes through the Lewisham Shopping Centre site.</p> <p>Part H states that within the designated town centre area and at its edges, development proposals must provide for an appropriate mix of main town centre uses at the ground floor level. Retail uses should be concentrated within the Primary Shopping Area, forming the main use across the shopping frontages.</p> <p>Part I requires development proposals to make provision for positive frontages with active ground floor frontages within the town centre and at its edges, and states that development must reinforce or create a positive relationship with the public realm at the street or ground floor level. New housing will only be acceptable on the upper floor levels.</p> <p>The Client acknowledges the need to deliver positive active frontages in order to improve the public realm and increase safety. The policy as drafted, however, seems only to consider traditional residential and does not acknowledge that alternative forms of residential uses can assist in creating active frontages. For example, PBSA, co-living and some residential developments often incorporate amenity spaces and lobbies at ground and lower floors, thus creating active frontages. It is suggested that the policy is amended to acknowledge the potential of residential type developments to provide active frontages and improve the public realm, instead of an absolute requirement to deliver non-residential uses at ground and lower levels.</p> <p>Part J adds that, in order to ensure Lewisham Major Centre maintains its role as a principal commercial and employment location within the Borough, development proposals must</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy LCA 2 Lewisham major centre and surrounds.</p> <p>The comments made in relation to the requirement for active frontages and ground floor uses are noted. However, the conclusions arrived at by the respondent are not justified. Evidence clearly demonstrates that the introduction of residential accommodation at ground floor level within designated town centres has an entirely harmful impact upon vitality and viability and specifically erodes active frontages. No alternative evidence to robustly demonstrate the benefits of the proposed approach is provided.</p> <p>For clarification, the Council acknowledges that there can be circumstances where specific ancillary elements of residential uses, such as entrances lobbies, staffed concierge desks/ building management spaces can be designed and operated to provide a form of active frontage that can contribute to town centre vitality and viability. The Council highlights and differentiates that such spaces and uses are ancillary to residential accommodation such as PBSA and managed/ serviced apartments that are in all cases located in the upper floors; above commercial street level. This is in contrast to solely residential uses, which the Council maintains are unacceptable at commercial street/ ground level (within retail centres).</p> <p>For clarity, the new Local Plan addresses the management and future place-shaping of the Borough’s major centres through Policy EC14. This seeks to manage future development proposals. This policy applies across the Borough – inclusive of the site allocations. The Council maintains that this approach is sound.</p>	No further actions required in relation to the new Local Plan.

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							<p>retain or re-provide existing workspace, and deliver net gains in industrial capacity where possible. This does not align with Policy EC2 (Protecting employment land and delivering new workspace) which does not make reference to the retention or reprovision of existing workspace and instead solely safeguards land included within Lewisham's Employment Land Hierarchy.</p> <p>The principle of loss of office at the Site has previously been established through prior approval applications (this is acknowledged in guideline 12 of the Lewisham Shopping Centre site allocation, further discussed below). However, under the provisions of the draft Policy it is not clear the extent to which existing employment floorspace is safeguarded outside of designated employment areas.</p> <p>Although Part J seeks to retain existing workspace, clarity is not provided as to the requirements of justifying any loss of floorspace – for example, it is not clear whether this should be based on market demand, or viability. Furthermore, if the Council seek to 'ensure Lewisham Major Centre maintains its role as one of the Borough's principal commercial and employment locations', this should be reflected in Figure 8.1 and Table 8.1 of Policy EC2 to ensure consistency</p> <p>We contend that both Policy LCA2 Part J and Policy EC2 should be amended to ensure consistency and to provide clarity on the locations to which employment development will be safeguarded and encouraged. Policy LCA2 should be amended to confirm the process for justifying loss of employment floorspace in areas in which it is safeguarded.</p>		
CON043	REP214	Knight Frank OBO Lewisham House No.1			3	LCA SA 02	<p>Site Allocation: Lewisham Shopping Centre The Site is included within the draft Site Allocation for Lewisham Shopping Centre; comprising a much larger site of 6.38 hectares. The allocation is for comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community and residential uses. An indicative development capacity of 1,579 net residential units; 20,097 sqm gross employment floorspace and 60,291 sqm of main town centre floorspace has been identified.</p> <p>Furthermore, paragraph 14.10 acknowledges that the redevelopment of Lewisham Shopping centre is essential to improving access and permeability within and through the centre and considers it noteworthy given its size and prominent location. The Client supports the allocation of the Site, and notes that development guideline 12 of the allocation acknowledges that the principle of redevelopment of the Site</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy LCA SA 02 Lewisham Shopping Centre.</p> <p>The Council notes the statement relating to site allocations involving multiple landownerships. It is entirely reasonable for the Council to encourage and seek discussion and understanding between neighbouring landowners as part of the decision-taking process. The application of the master- planning approach, possibly in conjunction with planning performance agreements (or other mechanisms) provides an effective process for achieving this objective. It is reasonable for the</p>	No further actions required in relation to the new Local Plan.

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							<p>has already been established through the prior approval process.</p> <p>The draft allocation acknowledges that there are different site ownerships across the allocation, stating that “redevelopment options for the plots of land that do not fall within the ownership of the Lewisham Shopping Centre should be explored, to better integrate them into a comprehensive scheme for the wider site allocation”. However, the allocation explains that landowners must “work in partnership and in accordance with a masterplan, to ensure the appropriate co-ordination, phasing and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development)”. As worded, the draft site allocation would prejudice the ability of the Site to come forward for redevelopment on an individual basis, instead requiring it to be delivered as part of the much larger site allocation. The allocation wording is particularly onerous in that it requires landowners to work in partnership and in accordance with a masterplan. The requirement for a masterplan has been discussed earlier within these Representations. To reiterate, the requirement for a masterplan is onerous and not fully justified. Furthermore, it is not sufficiently clear what the expectations for a masterplan would be. This is particularly the case given that the requirements of Policy DM3 Part B can be satisfied through the pre-application process and submission of a detailed planning application. The requirement for landowners to work in partnership is not sound and has the potential to cause significant delays in the delivery of development – particularly if owners have different or conflicting aspirations or have different commercial objectives that would require development to come forward at timescale not acceptable to the other parties. In the interest of ensuring deliverability of developments, whilst in an ideal world a masterplan covering the whole allocation would come forward, the reality is that sites will need to come forward as they are available to do so. The Council will have an important role to play to mediating between parties where a wider masterplan approach is sought.</p> <p>The Client acknowledges that it is necessary to consider surrounding context and take account of emerging development when (re)developing a site, however policy already requires emerging development to do so, without requiring ‘partnerships’ between landowners. See, for example, Policy EC13 Part B(c) which states that mixed-use development proposals within town centres will be considered having regard to compatibility of the proposed use with</p>	<p>Council to assume that landowners/ developers can talk to one another to agree approaches for meeting their shared objectives. It is unclear why this should not be possible.</p> <p>Master planning is an established mechanism for securing good design and successful place-making. It is widely acknowledged by development industry partners as an integral part of decision process deployed for considering large and sensitive proposals. In contrast to this representation, development industry partners are broadly supportive of this approach.</p> <p>Master planning at the start of decision-taking provides a sound, transparent and logical approach to the process. It is noted today that most development rarely come in as “full” applications; with even the largest strategic urban extensions being submitted as detailed outline applications that are then subject to further reserved matters proposals. Within that context, the preparation of a master plan at an early stage provides a logical and sound approach – which does not in any disadvantage the developer in terms of time cost.</p> <p>The comments made in relation to the types of residential uses that could be considered across the site allocation are noted. The new Local Plan must be read in its entirety. The new Local Plan includes policies that address proposals for other forms of residential accommodation – providing sound mechanisms for consideration through the decision-taking process. These mechanisms provide development partners with appropriate opportunities to promote and justify such proposals. This is a sound approach.</p> <p>The comments made in relation to indicative development capacities is also</p>	

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							<p>adjoining and neighbouring uses, both in terms of land use and character. The Client contends therefore, that it is possible and arguably more efficient, for parcels of land within an allocation to come forward separately whilst still providing compatible uses and maintaining overall cohesion. Given the varied land interests within the allocation, the wording must reflect that development of one parcel should not prejudice the development potential of another.</p> <p>The design-led process to optimise site capacity (for example, as per policy QD6 (Optimising site capacity) and EC13 (Optimising the use of town centre land and floorspace)) should take precedent over the indicative site capacity of the allocation, which has not given detailed consideration to the individual parcels of land within the wider site. Furthermore, we note above that Policy HO7 specifies that such development should be delivered within or at the edge of town centres, and Policy HO8 specifies that such developments should be appropriately located in areas that are wellconnected to local services. As such, we suggest that the allocation should be updated to reflect that the indicative residential capacity could also include alternative forms of residential such as PBSA and co-living in this highly accessible, town centre location. To this end, the indicative residential capacity of 1,579 net residential units must also be updated to include 'or the equivalent of' in order to account for uses such as PBSA – where 2.5 beds are equivalent to 1 residential unit. This will ensure the policy is robust and effective.</p> <p>Conclusion: Lewisham House No.1 Limited (Guernsey) support the preparation of the new Lewisham Local Plan and broadly agree with the objectives and aspirations set out within the Regulation 19 Proposed Submission Document. In particular, the Client supports the inclusion of the Site within an allocation for comprehensive redevelopment, and the focus on encouraging a town centre first approach. However, the allocation as currently worded prejudices the Site as an individual development plot</p>	<p>noted. The Council considers that the new Local Plan is sound on this matter. Policy provides sufficient flexibility for development partners to justify potential alternative approaches to securing an optimal development capacity. That includes the consideration of forms of residential accommodation in circumstances where such proposals are justified. National planning policy and guidance provides clear direction on how alternative residential accommodation, where it is appropriate, can be accounted for in terms of housing delivery. The Council notes that the overwhelming housing demand in Lewisham remains for genuinely affordable homes and market housing.</p>	
CON044	REP215	Lichfields OBO Tesco Stores Ltd			3	LCA SA 05	<p>Introduction Lichfields has been instructed by our client, Tesco Stores Ltd (hereafter referred to as 'Tesco'), to review the draft Lewisham Local Plan ('LLP') having regard to its retail store and property interest at Conington Road, Lewisham, SE13 7PY, and to submit a representation to the Proposed Submission consultation for the LLP (Regulation 19).</p>	<p>The Council welcomes the broad level of support offered in relation to the new Local Plan Policy LCA SA 05 Land at Conington Road and Lewisham Road (Tesco). The further background and contextual comments made in relation to the site allocation are noted.</p> <p>Provision of a Temporary Food Store</p>	No further action required in relation to the new Local Plan.

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							<p>Our representation therefore provides commentary on the following draft site allocation and planning policies:</p> <ul style="list-style-type: none"> • Site Allocation 5: Land at Conington Road and Lewisham Road (Tesco) • High Quality Design (Policies QD1, QD4 and QD6) • Optimising the Use of Town Centre Land and Floorspace (Policy EC13) • Lewisham Central Area Place Principles (Policies LCA1 and LCA2) • Retail Car Parking (Policy TR4) <p>The representation follows and is consistent with Tesco's 9 April 2021 representation to the previous iteration of the Local Plan: The Main Issues and Preferred Approaches consultation (Regulation 18) version.</p> <p>The reader should also be aware of Astir Living's representation to this Regulation 19 version of the Local Plan (prepared by Boyer), also on the Site Allocation 5 ('SA5') and the above policy topics.</p> <p>Lewisham Tesco Superstore The Tesco superstore and petrol filling station at Conington Road lies on the edge of but within Lewisham the town centre. The store has served Lewisham residents and shoppers since 1987, providing main and top-up food shopping in a highly accessible location, as well as providing local employment (currently 125 full and part time staff as well as a number of apprenticeships).</p> <p>In the last 10-15 years there have been very considerable changes in shopper behaviour and spending across the UK and travel patterns in London. This has manifested in a sizeable reduction in car borne main food shopping at this store.</p> <p>In 2015, Tesco sold two areas of the original 536 space car park to Meyer Homes for residential-led redevelopment, with a consequential loss of 251 car parking spaces, to the present 285 car parking spaces. Meyer Homes secured full planning permission for a 365 homes mixed use scheme in January 2020 and a s73 variation was approved in December 2021.</p> <p>The site is the subject of LLP SA4 and is presently being built out by Watkins Jones for 'build to rent' homes. The retail store itself is tired and dated as a retail operation and has long been identified by Tesco for investment through the provision of a</p>	<p>The Council notes this anticipated requirement. The Council considers that this is a matter that can reasonably be addressed through the decision-taking process. The Council will seek to work proactively with development partners to secure such provision where it is necessary and capable of being provided without prejudicing wider objectives inclusive of successful place-shaping.</p> <p>Site Allocation Paragraph 14.42 The comments and the suggested addition to the supporting text are noted and discounted. The Council does not consider this necessary to ensure soundness. As stated elsewhere, the specification for a "replacement" food store is unnecessary proscriptive and may render the policy ineffective over the life of the plan.</p> <p>Indicative Development Capacity Comments made in relation to the site allocations possible development capacities are noted. Within this context the Council highlights that the new Local Plan must be read and considered in its entirety. The new Local Plan site allocations identify indicative development capacities – the emphasis being upon the word "indicative". The capacity figures identified within the new Local Plan are very much a starting point on a journey to identifying and securing optimal development capacities.</p> <p>In turn, the development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an</p>	

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							<p>modern replacement store, to better serve Lewisham shoppers, as part of more intensive mixed-use development.</p> <p>Such a replacement store also affords the opportunity to provide a building design of better quality and sustainability. Having reviewed its existing and future expected requirements for this store, Tesco need to replace it with a modern store providing a minimum of c. 2,400 sq m. (25,850 sq ft) net sales area on a single level, served by a minimum of 140 car parking spaces – i.e. a 51% reduction in car parking. The petrol filling station will not be replaced. Tesco consider that this is the maximum reduction in the size its car parking for this store that can be achieved whilst maintaining the operation and viability of the store, in particular its main food shopping business.</p> <p>In addition, for any redevelopment of the site, Tesco would need a temporary store to be provided on site to ensure continuity of trade up and until a new replacement store is operational.</p> <p>Tesco, the freehold owner and retail occupier of the area of land covered by LLP SA5, has recently entered into contract with Astir Living, for the specialist housing developer to bring the site forward for residential-led mixed use redevelopment, including the Tesco required replacement and temporary stores, in partnership with Tesco.</p> <p>Site Allocation 5: Land at Conington Road and Lewisham Road (Tesco) Site Allocation Tesco continues to support the principle of 'Land at Conington Road and Lewisham Road (Tesco)' being allocated (SA5) for "Comprehensive mixed-use redevelopment with compatible main town centre, commercial and residential uses. Public realm, access and environmental enhancements including new public open space, improved walking and cycle routes and along the river" (para 14.42).</p> <p>We would, however, encourage that the below additions are added to the description of the site allocation. "Comprehensive mixed-use redevelopment with replacement large retail store, compatible main town centre, commercial and residential uses. Public realm, access and environmental enhancements including new public open space, car and cycle parking, improved walking and cycle routes and along the river".</p> <p>Indicative Development Capacity</p>	<p>opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>The Council concludes that the new Local Plan's master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p> <p>The Council notes and welcomes new technical work that may have been undertaken to support the progressive redevelopment of the site. In that respect the Council encourages development partners to constructively engage with the decision-taking process – as outlined above. This provides an opportunity for such evidence to inform the master planning and design-led approaches that will bring forward growth across the Borough.</p> <p>The master planning and design-led approaches that will be applied to this site provide appropriate and effective mechanisms to considers possible design matters, including the use of a podium format, through the decision-taking process. For these reasons, the Council considers the existing wording sound.</p> <p>Replacement of Bus Stops/ Sustainable Travel Network Provision The Council notes the comments made in relation to the content of new Local Plan Policy LCA SA 05 Paragraph 14.45 9 – specifically in relation to the retention of public transport connectivity (a bus stop) on-site. The suggestion that this requirement be removed is discounted on the grounds that this will harm the</p>	

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							<p>We appreciate and agree that the development capacity is indicative and is a matter to be determined through detailed design and planning processes and that “development proposals must use the designed approach to make the best use of land and optimise the capacity of the site” in accordance with draft Policy QD6 (Optimising site capacity).</p> <p>As is previously mentioned, Tesco seek to remain on Site, requiring, however, a podium level store which measures c.2,400sq m net sales area to meet Tesco’s operational requirements. This is a fundamental requirement in unlocking this Site for comprehensive redevelopment and retaining employment in the Borough. We would therefore recommend that the indicative development capacity explicitly identifies a replacement Tesco Supermarket for c.2,400 sqm net sales area (Class E).</p> <p>With regard to the indicative residential capacity, whilst we note the modest increase from 380 homes in the regulation 18 version of the Local Plan, to 407 homes, we still consider this to be a significant underestimate for this highly accessible ‘Major Centre’ site (PTAL 5-6b), next to the station and adjacent to the under-construction Conington Road development, including one building up to 35 storeys, indicating much greater optimisation is possible. We would encourage that the uplift in residential floorspace is reconsidered and increased, having regard to the location and site-specific considerations.</p> <p>Your ‘standard method’ for an Opportunity Area site with a central setting and 5-6b PTAL, indicates a capacity of (1.53 ha x 450 dwellings/ha) 689 homes.</p> <p>Development Guidelines We note that Development Guideline 9 states that “Development should allow for the retention and/or re-provision of the bus stop and stand facility that are currently provided on this site”. We consider that any prescriptive requirement for the retention or reprovision of a bus stop on-site is unnecessary and would materially impact on the ability to optimise the site’s development.</p> <p>The site benefits from close proximity to Lewisham station interchange and a number of bus stops (serving a number of routes) on Lewisham Road and Station Road. We therefore recommend that Development Guideline 9 is deleted.</p>	<p>accessibility onto the site and result in unsuccessful place-making.</p> <p>The Council expresses its surprise that the respondent states that the retention of a bus stop on-site “<i>would materially impact on the ability to optimise the site’s development.</i>” This statement appears counterintuitive as public transport connectivity is a key component of successful place-making and reasonably provides future customers and residents access to the sites – conceivably removing the need for expansive parking provision or providing an opportunity to configure it more efficiently. It is highlighted that securing good, improved access to public and sustainable transport infrastructure networks is a key strategic objective.</p>	

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							We trust our representations will be taken into consideration in the progression of the emerging Lewisham Local Plan. We would be grateful for the opportunity to meet with you to discuss our suggested amendments to the above policies and the Lewisham SA5 allocation.		
CON044	REP216 a and b	Lichfields OBO Tesco Stores Ltd			2	QD 01 QD 06	<p>Delivering High Quality Design in Lewisham (Policy QD1) and Optimising Site Capacity (Policy QD6)</p> <p>Tesco is supportive of LBL's overarching aim at Policy QD1 to ensure that proposals deliver a highquality design which contributes to the delivery of inclusive, safe, healthy, liveable, and sustainable neighbourhoods in Lewisham.</p> <p>In particular, Tesco supports the Draft Plan's Design Led Approach to development proposals, through policies QD1 and QD6 that "development proposals must use the design-led approach to make the best use of land and optimise the capacity of a site."</p> <p>Tesco also support the flexibility at Policy QD6 Limb C regarding the below indicative capacities and development parameters in the draft allocations: "Development parameters for specific sites are set out in this Local Plan (Part 3 - site allocations). Where development proposals do not accord with the indicative capacity set out in a site allocation policy, they will only be supported where it is clearly demonstrated the optimal capacity will be achieved, having regard to (A) [Design Led Approach] and (B) [Criteria for establishing maximum capacity of the site] above."</p>	<p>The Council welcomes the support offered in relation to the new Local Plan Policy QD 01 Delivering high quality design in Lewisham, and Policy QD 06 Optimising site capacity.</p> <p>The specific support towards Policy QD 01 objective of securing high quality design and use of the design-led approach to make the best use of land is noted.</p> <p>The specific support for Policy QD 06 flexible approach towards indicative development capacities is also noted.</p>	No further action required in relation to the new Local Plan.
CON044	REP217	Lichfields OBO Tesco Stores Ltd			2	QD 04	<p>Building Heights (Policy QD4)</p> <p>Policy QD4 (Building Heights) does not consider the design led approach when considering building heights. Whilst Tesco support part C of the policy, which states tall buildings within Lewisham town centre should be between 16 to 35 storeys, the Site (SA5) is only considered to be appropriate for buildings which are a maximum of 16 storeys. Given the 'Major Centre' location, the sites high accessibility of PTAL 5-6b, adjacent to a multi service transport node and close proximity to a number of tall buildings, including the under construction Conington Road (up to 35 storeys) and Lewisham Gateway developments, it is indicative that greater optimisation and building heights on the site should be achieved (than 16 storeys). The exact heights and densities would be dependent on the design led approach to development and its assessment. Accordingly, we would encourage Policy QD4 to include a reference to the need to justify buildings heights on a design-led approach, in accordance with London Plan Policy D3 (Optimising Sites through a Design-Led Approach) and Policy D9 (Tall Buildings) (2021) and Policy QD6. Alternatively, if heights are specified,</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 04 Building Heights – specifically in terms of the suggestion that a specific location should be identified as suitable for an even taller new building; this being upon work undertaken to support a specific development proposal. Within the context of this specific representation, the council considers that the site is not within a suitable location for tall new buildings that could significantly exceed the maximum height identified in the new Local Plan. The specific location is not within the core of the town centre and is adjacent to lower residential development. These key considerations were considered by the robust evidence prepared in support of the new Local Plan.</p>	No further action required in relation to the new Local Plan.

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							this should include text such as 'these are indicative height guidelines to inform and allow flexibility required by a design-led approach.	<p>For clarity, the policy does require all proposals for tall new buildings to be progressed through a master planning process. It states –</p> <p><i>“Tall buildings must be delivered through a masterplan process in order to ensure that they are appropriately located, designed to a high quality standard and effectively managed over the lifetime of the development. The requirements for masterplans are set out in Policy DM4 (Masterplans and comprehensive development).”</i></p> <p>The Council considers this a sound approach that provides development partners with an opportunity to negotiate with decision-takers to secure sustainable development and successful place-making. It is consistent and in accordance with the London Plan.</p>	
CON044	REP218	Lichfields OBO Tesco Stores Ltd			2	EC 13	<p>Optimising the Use of Town Centre Land and Floorspace (Policy EC13)</p> <p>Tesco support the principle of draft LLP Policy EC13, namely that development proposals should optimise the use of land and floorspace within town centres and at edge-of-centre locations.</p> <p>We would encourage text to be added to the draft policy supporting greater optimisation in town centre locations with the greatest PTAL locations (5, 6a or 6b) such as Lewisham Town Centre.</p>	<p>The Council welcomes the broad level of support offered in relation to the new Local Plan Policy EC 13 Optimising the use of town centre land and floorspace.</p> <p>The suggestion that the policy be amended to include wording that supports greater optimisation in town centre locations with high PTAL ratings is noted and discounted. Such an addition is unnecessary to ensure soundness. Town centres, especially Lewisham Town Centre, are already signalled as being highly sustainable accessible locations for development through the spatial strategy, relevant site allocations and other planning policies. These provide decision-takers sufficient flexibility to consider this matter when it demonstrably arises.</p>	No further action required in relation to the new Local Plan.
CON044	REP219 a and b	Lichfields OBO Tesco Stores Ltd			3	LCA 01 LCA 02	<p>Lewisham Central Area Place Principles (Policy LCA1 and LCA2)</p> <p>Tesco continues to welcome the vision and spatial objectives for Lewisham’s Central Area Place Principles, including its focus on the town centre of Lewisham, identified as a “Major Centre” and “Regeneration Node”, as identified at ‘Figure 14.2: Central Area key diagram’ .</p>	<p>The Council welcomes the support offered in relation to the new Local Plan Policy LCA 01 Central Area place principles and Policy LCA 02 Lewisham major centre and surrounds.</p>	No further action required in relation to the new Local Plan.

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							Tesco supports the ambition of Policy LCA2B (b) to support “Continued investment in Lewisham Major Centre to enable its future designation as a Metropolitan Centre of sub-regional significance in London is a strategic priority”.	<p>The specific support for Policy LCA 01 identification of Lewisham as a Major Centre and Regeneration Node is noted.</p> <p>The specific support for Policy LCA 02 identifying Lewisham for continued investment to enable its designation as a future Metropolitan Centre is also noted.</p>	
CON044	REP220	Lichfields OBO Tesco Stores Ltd			2	TR 04	<p>Retail Car Parking (Policy TR4) We observe that draft LLP Policy TR4B has been updated to meet the parking requirements and standards set out in the now adopted London Plan.</p> <p>It is noted that at Paragraph C it states that “Development proposals must not exceed the maximum car parking standards set out in the London Plan”. This includes retail parking. The London Plan Table 10-5 identifies the maximum retail car Pg 5/6 26537964v1 parking standard to be car free (with exception of disabled persons parking) for areas of PTAL 5-6, which would on face value, apply to any retail schemes in Lewisham Town Centre. The approach to retail parking in the LLP must though now reflect the change at limb G of the adopted LP policy T6.3, arising from a policy modification required by the SoS to enabling a less restrictive approach to retail car parking to apply in specified circumstances. Specifically, TC6.3G states: “G. Boroughs may consider amended standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence that the standards in Table 10.5 would result in: a. A diversion of demand from town centres to out of town centres, undermining the town centres first approach. b. A significant reduction in the viability of mixed-use redevelopment proposals in town centre.” Over time, there are likely to be further reductions in parking demand associated with large scale food retail sites, and a rise in online deliveries. Nonetheless, pre-pandemic, more than 80% of UK shoppers still carried out a weekly/fortnightly main food shop. The volume of purchases made at a typical weekly/fortnightly shop often means that transporting goods on foot, cycle or by public transport is unfeasible. Therefore, whilst there remains a public desire to shop in this way, it will be necessary to provide appropriate levels of car parking for large foodstores to remain viable, including those in London where car usage is less. A reduction in car parking demand, the use of alternative modes of travel and increase of on-line shopping over time has been evident at the Tesco superstore in Lewisham. However, car borne main food shopping trips do continue to comprise a sizeable proportion of the store’s turnover. Tesco would not</p>	<p>The Council notes the comments and objection made in relation to the new Local Plan Policy TR 04 Parking.</p> <p>For clarity, the London Plan Policy T6 Car Parking clearly states that –</p> <p><i>“Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity... Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’).”</i></p> <p>The London Plan Policy T6 continues by stating that –</p> <p><i>“The maximum car parking standards set out in <u>Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking</u> should be applied to development proposals and used to set local standards within Development Plans.”</i></p> <p>For further clarity, the London Plan Policy T6.3 states –</p> <p><i>“The maximum parking standards set out in <u>Table 10.5</u> should be applied to new retail development, unless alternative standards have been implemented in a Development Plan through the application of Policy G below. New retail development should avoid being car-dependent and should follow a town centre first approach, as set out in <u>Policy SD7 Town centres</u>:</i></p>	No further action required in relation to the new Local Plan.

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							<p>proceed with redevelopment of this store to achieve significant development intensification, if it meant any required replacement store in the town centre PTAL5-6b location had to be served by a level of car parking provision less than that required by expected customer demand. To do so would undermine both the store's trading and redevelopment viability to the detriment of the Tesco business, shoppers and the vitality and viability of Lewisham town centre. This is not just a commercial consideration for Tesco (or any supermarket retailer) but a planning consideration for the vitality and viability of Lewisham Town Centre, risking the consequential loss of trade to out of centre stores, resulting in trade loss to the town centre, as well as less sustainable travel patterns and additional CO2 emissions. Accordingly, we recommend an additional paragraph is added to the explanation of policy TR4B(c.) on Retail Parking to address the above.</p>	<p><u>development principles and Development Plan Documents."</u></p> <p>It is highlighted that the new Local Plan does not identify alternative standards for this location or other town centres. For that reason, the existing policy wording is considered sound.</p> <p>The respondent's comment that it remains necessary to provide car parking at appropriate levels is noted. The Council considers that the levels that would be provided through the application of the adopted parking standards are appropriate. The Council notes that in parallel to changing convenience food retail patterns, private car usage and ownership is also under going structural change. This is a factor that can reasonably be anticipated accelerate over the life of the plan. It is a well-established fact that the nation's major food retailers have over-provided parking provision – evidenced through unimplemented permissions, typically for new parking decks. The Council encourages development partners to be open and predictive of inevitable change and consider innovative solutions. The new Local Plan's master planning approach (to this site and others) provides an appropriate and sound platform.</p> <p>The creation of a site-specific parking study that supports the respondent's interests is noted. The Council suggests that the new Local Plan provides sufficient flexibility for such technical evidence to be considered and independently assessed through the decision-taking process. It is inappropriate and unreasonable for such detailed evidence to be considered through the plan-making process.</p> <p>Finally, the comment that private vehicle's offer customer convenience is noted and discounted. The respondent's claimed</p>	

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								support for addressing the climate emergency appears to be in conflict to this statement, which does little to encourage and enable sustainable travel patterns or successful place-shaping.																															
CON045	REP221	Avison Young OBO Legal & General (L&G)				LCA SA 07	<p>Representation to Lewisham Local Plan Regulation 19 Stage “Lewisham Local Plan: Proposed Submission Document” (Dated January 2023) – Lewisham Retail Park, Loampit Vale</p> <p>We write on behalf of our client, Legal & General (L&G), to submit a representation to the London Borough of Lewisham (LBL) in response to the Lewisham Local Plan: Proposed Submission Document (dated January 2023). The consultation period for this document closes on Tuesday 25th April 2023.</p> <p>This representation is made specifically in relation to the draft Site Allocation 7: Lewisham Retail Park, Loampit Vale (the Site).</p> <p>These representations follow those made on behalf of L&G, on the Regulation 18 Stage of the Lewisham Local Plan, dated 9th April 2021 which set out the background and current policy context for the Site.</p> <p>Comments on the Local Plan: Proposed Submission Document</p> <p>We welcome the opportunity to comment on the draft Local Plan. Overall, L&G is supportive of the inclusion of the draft site allocation for Lewisham Retail Park, Loampit Vale (Site Allocation 7) and the principle of redevelopment for this site.</p>	The Council notes Legal & General’s introductory comments and welcomes the support given to Site Allocation 7 Lewisham Retail Park.	No further action required in relation to the new Local Plan.																														
CON045	REP222	Avison Young OBO Legal & General (L&G)				LCA SA 07	<p>We note that the Proposed Policies Map (January 2023) identifies the Site as an appropriate location for a tall building. This aligns with the findings of the Council’s supporting evidence base document: “Tall Building Review Background Paper – January 2023” which identifies the Site (reference L9 in this Paper) to be included in a ‘tall building suitability zone’ and recommended to be grouped together with a cluster of adjoining sites of a maximum of 35 storeys clustered around Lewisham Station. An extract of the Table from the Paper detailing this is included in Figure 1.0 below:</p> <table><tr><td></td><td></td><td></td><td></td><td></td><td>max. 35 storeys clustered around station</td></tr><tr><td>L8</td><td>Recently developed mixed use tower blocks bordered by rail on north and western sides and Jerrard St on east side.</td><td>Y</td><td>Recently developed</td><td>Completed scheme scale: up to 10 storeys</td><td></td></tr><tr><td>L9</td><td>Lewisham Retail Park</td><td>N</td><td></td><td>Site allocation 7 (central area) Extant permission ref: DC/16/097629 Podium with series of towers up to 23 storeys and tall parapet concealing services</td><td>Group with adjoining sites – max. 35 storeys clustered around station</td></tr><tr><td>L10</td><td>Student Exchange towers, recently developed student housing with Bakerloo terminus for future BLE</td><td>Y</td><td>Recently developed</td><td>Completed scheme scale: up to 34 storeys</td><td></td></tr><tr><td>L11</td><td>Lewisham Gateway</td><td>N</td><td></td><td>Site allocation 1</td><td>Heart of metropolis</td></tr></table>						max. 35 storeys clustered around station	L8	Recently developed mixed use tower blocks bordered by rail on north and western sides and Jerrard St on east side.	Y	Recently developed	Completed scheme scale: up to 10 storeys		L9	Lewisham Retail Park	N		Site allocation 7 (central area) Extant permission ref: DC/16/097629 Podium with series of towers up to 23 storeys and tall parapet concealing services	Group with adjoining sites – max. 35 storeys clustered around station	L10	Student Exchange towers, recently developed student housing with Bakerloo terminus for future BLE	Y	Recently developed	Completed scheme scale: up to 34 storeys		L11	Lewisham Gateway	N		Site allocation 1	Heart of metropolis	<p>The Council welcomes Legal & General’s support regarding the site being in an appropriate location for tall buildings.</p> <p>The Council agrees that the new Local Plan does not accurately reflect the Tall Building Review 2023, with omissions in relation to referencing tall buildings in Lewisham’s Central Area Site Allocation 7 Lewisham Retail Park (as well as a number of other site allocations) and errors in the text in Schedule 12 too.</p>	<p>Consider the following modification (omission) text:</p> <p>“Appropriate Location for Tall Buildings” within the Planning Designations and Site Considerations box of these site allocations: LCA SA 07 Lewisham Retail Park LCA SA 21 Wickes and Halfords LNA SA 02 Deptford Landings MEL LNA SA 09 Surrey Canal Triangle MEL</p> <p>Consider modification (omission) text in Schedule 12: Tall Building Suitability Zones, to align with Figures 5.3-5.10 of the new Local</p>
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							<p>Figure 1.0 – Table taken from page 12 of Tall Building Review Background Paper (January 2023)</p> <p>The allocation of the Site as an appropriate location for a tall building is supported by L&G and aligns with the extant planning permission for the Site (ref: DC/16/097629) for buildings of up to 23 storeys in height.</p> <p>However, the current ‘Planning Designations and Site Considerations’ section of Site Allocation 7: Lewisham Retail Park does not expressly state that this Site is identified as a suitable location for a tall building and currently reads as follows: Opportunity Area, Regeneration Node, Bakerloo Line Safeguarding Direction, Adjacent to <i>Site of Importance for Nature Conservation</i>, Adjacent to <i>Strategic Open Space</i>, <i>Air Quality Management Area</i>, <i>Air Quality Focus Area</i>, <i>Major Centre</i>, <i>Night-time Economy Hub</i>, <i>Flood Zone 2, 3</i>, <i>Groundwater Source Protection Zone 1</i>, <i>Critical Drainage Area</i></p> <p>To accord with London Plan Policy D9 ‘Tall Buildings’ part B and for the Local Plan to be therefore, ‘sound’, we request that it is expressly stated in this part of Site Allocation 7: Lewisham Retail Park that the Site is identified as an “appropriate location for a tall building” in the same way that this is included in other site allocations such as Site Allocation 6: Thurston Road.</p> <p>Further, the Site is not expressly listed in Schedule 12 of the Lewisham Local Plan: Proposed Submission Document (January 2023) which expressly lists Tall Building Suitability Zones. Again, to accord with London Plan Policy D9 part B and the Local Plan to be therefore found ‘sound’, we request that the Lewisham Retail Park site is expressly listed in this Schedule under the Lewisham group ‘Conington Road brownfield site, Land at Conington Road and Lewisham Road, Thurston Road Bus Station and Lewisham Gateway’ identified for buildings of up to 35 storeys in height. As above, this is in line with the findings of the Council’s evidence base document: Tall Building Review Background Paper – January 2023.</p> <p>Next Steps We look forward to confirmation of receipt of these representations at the earliest opportunity. If you have any queries, please do not hesitate to contact me.</p>		<p>Plan, in relation to the following sites:</p> <p>Evelyn Court LSIS 35 Neptune Wharf MEL 25 Lewisham Retail Park 35 Axion House 16 Land at Conington Road and Lewisham Road 16 Lewisham Gateway 35 with 16 storeys in south eastern corner Church Grove self build site 16 Stanton Square LSIS 12</p>

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CON046	REP223	4TY OBO St Dunstan's Educational Foundation			3	LCA SA 20	Representation includes: - Proposed masterplan - Initial feasibility study	The Council notes the supporting information submitted by 4TY in relation to the new Central Area Site Allocation 20 South Circular.	No further action required in relation to the new Local Plan.
CON046	REP224	4TY OBO St Dunstan's Educational Foundation			3	LCA SA 20	<p>1 Introduction</p> <p>1.1. 4TY Planning Ltd has prepared this representation to the London Borough of Lewisham's ("the Council") Draft Local Plan Regulation 19 Consultation on behalf of St Dunstan's Educational Foundation ("the College").</p> <p>1.2. The College's Representation focuses on the Draft Local Plan's impact on its sports facility at the Jubilee Sports Ground, Canadian Avenue, Catford ("the site"), particularly in respect of emerging plans for the re-routing of the South Circular (A205) and the removal of part of the site from the Metropolitan Open Land ("MOL"), which will facilitate the redevelopment and regeneration of Catford town centre.</p> <p>1.3. Proposals for the re-routing of the South Circular were not included in the Regulation 18 Consultation, but we understand have been included in response to a representation submitted by Transport for London ("TfL"). The College did not make representations to the Regulation 18 Consultation.</p> <p>1.4. This Representation provides an introduction to the College, its history, vision, values and role in the local community. It then moves on to describe the Jubilee Sports Ground, how it is used and the College's emerging plans for the enhancement of its asset.</p> <p>1.5. Following this, the Representation reviews relevant draft policies in relation to housing development and sites designated Metropolitan Open Land, followed by a review of the emerging proposals for Catford town centre and the South Circular. Finally, the Representation explains the College's proposals for the Jubilee Sports Ground with these also being introduced on the drawings submitted with this Representation.</p> <p>1.6. The College is keen to make clear from the outset that it is supportive of the Council's overall vision and proposals for the regeneration of Catford town centre. However, it is the College's position that the proposals as currently indicated, will result in the Jubilee Sports Ground and the former groundsman's house towards the site's NW corner being</p>	<p>The Council notes the introductory comments made in relation to the new Local Plan Policy LCA SA 20 South Circular.</p> <p>For clarity, these, and subsequent comments (see below) do not intrinsically challenge the soundness of the new Local Plan Policy LCA SA 20. Rather the representations seek to promote part of the Jubilee Sports Ground for redevelopment.</p> <p>South Circular Improvements The new Local Plan includes the re-routing of the South Circular Road as a key transport infrastructure improvement for Catford Town Centre. The proposed new road layout design, with Catford Road realigned to the south of Laurence House, provides an opportunity to create a much improved consolidated and people focused public realm at the heart of the revitalised town centre. The provision of large and flexible open spaces, to enhance the setting of existing and new buildings, could allow for a range of activities to take place.</p> <p>The implementation of the proposal will require the release of a modest portion of the Metropolitan Open Land located within the St Dunstan's College (the Jubilee Sports Ground) to be used solely for the purposes of re-routing the A205 South Circular.</p> <p>For clarity, the land identified within the red-line boundary at new Local Plan Policy LCA SA 20 shows the anticipated maximum land take required. It is anticipated that the actual extent of land required for the re-alignment of the South Circular Road will be more modest. The shared</p>	No further action required in relation to the new Local Plan.

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							<p>blighted. However, these impacts can be resolved through the modification of the draft Local Plan.</p> <p>2 Introduction to St Dunstan’s College</p> <p>2.1. This section of the Representation introduces the College, its history, vision, values and role in the local community.</p> <p>2.2. The College moved to its current site in 1888, having previously been located in the City of London, close to Tower Hill. The College provides an outstanding education to its students, proving itself to be at the forefront of educational thinking and having recently won a spate of awards and accolades, including Independent Senior School of the Year (2022), Coeducational School of the Year (2019) and, this year alone, awards for Independent School of the Year at the International Elite 100 Global Awards and Most Progressive Independent School in London. One of the reasons for this level of recognition is the substantial role the College plays within its local community, working closely with local partners in order to provide life-enhancing opportunities for residents and community groups.</p> <p>2.3. The College purchased the Jubilee Sports Ground in 2012 given that pitch capacity within the main school site was inadequate to meet its educational and operational needs. Since that time, the ground has become an essential hub for the College’s wide-reaching programme of community engagement, as well as supporting sporting excellence within a pioneering genderneutral sports programme.</p> <p>2.4. Additionally, the College allows external bodies and clubs to make use of the all weather pitches and grass pitches throughout the year, giving the local community access to high quality sports facilities.</p> <p>2.5. The aerial image below shows the location of the Jubilee Sports Ground (outlined in red) relative to the main College site (identified by the star). The site lies directly opposite Catford Bridge station with Catford station immediately to the west. Catford town centre lies immediately to the north and north east of the site.</p> <p>2.6 St Dunstan’s College is a registered charity (Charity Number 312747). It provides education for students between the ages of 3 and 18 years old, providing bursaries and scholarships to a wide range of pupils and opens its facilities to the wider community.</p>	<p>objective, of the Greater London Authority, Transport for London, and the Council, is that the impact on the extent and visual character and appearance of the Metropolitan Open Land be minimised. The precise extent of land required for the realignment of the South Circular Road will be established through the detailed design phase.</p> <p>Details of Transport for London’s proposals for the South Circular Road at Catford can be found on their website - Catford Town Centre, changes to South Circular Road Have Your Say Transport for London (tfl.gov.uk)</p> <p>The Council considers the inclusion of the policy at Regulation 19 to be legally compliant. The Council maintains that the policy is sound.</p> <p>Possible Blight</p> <p>The Council notes and discounts the suggestion that the policy and the proposed infrastructure highway and town centre improvements “blight” development potential across the Metropolitan Open Land located within the St Dunstan’s College (the Jubilee Sports Ground).</p> <p>For clarity, the Council highlights that the site is entirely comprised of Metropolitan Open Land and is also identified as open space protected under the new Local Plan Policy GR 02 Open Space. Consequently, the development potential of the site is limited to open space use/ uses compatible with Metropolitan Open Land. The London Plan Policy G3 Metropolitan Open Land states – “MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt”.</p> <p>In turn the NPPF Paragraphs 147 – 151 provide guidance on the very special</p>	

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							<p>2.7. The College has a very well established community outreach and partnerships programme. The College's community is formed of three main parts; the residents of Catford and Lewisham, the pupils and their families (including alumni); and the wider organisations across London and internationally with whom the College shares spaces and ideas.</p> <p>2.8. The College believes in a broader educational purpose that supports the ongoing aspirations for the betterment of Lewisham and its residents and it knows that such work aligns with the educational aims for its pupils. Through its work with local partners, the College provides life enhancing opportunities to local people that seek to promote social mobility, engender wellbeing and improve communities in addition to responding with benevolence and charity to local needs and events.</p> <p>2.9. The College recognises its privilege as an independent school but strives to ensure that its facilities can be of benefit to the communities which extend beyond the school gates.</p> <p>2.10. Each year the College publishes on its website a brochure to summarise the various strands of its community outreach and support. Across the academic year 2021-2022, the College achieved the following:</p> <ul style="list-style-type: none"> Supporting children and local schools: <ul style="list-style-type: none"> Bursaries totalling £792,000 were provided through the College's bursary programme. Local schools were also supported through students being welcomed for regular masterclasses and performances; schools being given access to the College's pool and allowing free use of the Great Hall and Theatre. With Lewisham Council and Westside Young Leaders Academy, the College established the Lewisham Young Leaders Academy, providing additional support to young people from across the Borough through transformative teaching in life skills, including leadership, teamwork, presentation skills and CV building. More than 60 students from across the Borough attend the Academy each week. Sport: <ul style="list-style-type: none"> The College gives 5 hours of free pitch hire at the Jubilee Sports Ground to Catford and Lewisham police units for training and fitness. The College gave Lewisham's London Youth Games football squad free access to the all weather pitches ahead of major events. Lewisham's School Games were hosted at the Jubilee Sports Ground with multiple schools participating. 	<p>circumstances when development could be considered. The Council notes and highlights that local transport infrastructure is identified (at NPPF Paragraph 150).</p> <p>In conclusion, the Council considers that the development opportunities available across the Jubilee Sports Ground are limited. There is no evidence that the proposed highway and town centre infrastructure improvements will harm the continued operation of the sports ground as open space. Indeed, it is arguable that the improvements may provide an enhancement. The Council reiterates that a key objective is to minimise land take and that the identified red-line area is indicative. For these reasons, the Council maintains that the policy is sound and does not prejudice the continued use of the sports ground.</p> <p>The Council will continue to work positively with its infrastructure and development partners to deliver the new Local Plan's spatial strategy and site allocations.</p>	

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							<p>o The College supported the MCC Community Cricket Hub, St Dunstan's Festival:</p> <p>o The 2021 Festival hosted more than 160 events across 11 days, including performances, exhibitions, workshops, lectures and competitions.</p> <p>o 10 local schools took part in a variety of community events, including an open air concert, an international evening celebrating all cultures and races and a community sings event which brought together local choirs.</p> <p>o Free open air cinema with 600 tickets made available to the local community.</p> <ul style="list-style-type: none"> • Community Service and Charity: <p>o Students raised money for new trees to be planted in Catford.</p> <p>o The Lewisham Historical Society was given free use of the College's facilities.</p> <p>o The "St Dunstan's Sleep Out" raised £5,000 for Centrepont.</p> <p>o Over 1,000 books were collected and donated to charity, providing books for disadvantaged local families.</p> <p>o Over £4,000 was raised for DEC's Ukraine Appeal. providing local children with 13 weeks of free cricket coaching and pathways.</p> <p>o Over 10,000 swimming lessons were delivered to local children through the St Dunstan's Swim School.</p> <p>3. The Jubilee Sports Ground</p> <p>3.1. This section introduces the site, summarises how the College uses the facility and explains its vision for the future development and enhancement of the site as an asset both for students at the College and the wider community.</p> <p>3.2. The site was previously a private sports ground, owned by RBS Bank. The College purchased the site in 2012 due to a lack of adequate capacity on the main College site to meet operational needs. Since purchasing the site, the College has invested heavily in the enhancement of facilities at the site, delivering the all weather pitches towards the south, which has facilitated the site hosting a wider range of sports than previously was possible.</p> <p>3.3. The site is enclosed on all sides by tall security fencing. Thus although it adjoins the town centre, it is physically and functionally separate from it.</p> <p>3.4. Towards the west of the site is the pavilion, which appears to have been built in the 1960s and then extended over time. The building is in a poor state of repair and of an inefficient design and construction. It provides only a single set of</p>		

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							<p>changing facilities, heavily limiting the College's ability to allow wider community access onto the site on weekdays during termtime given safeguarding and security concerns.</p> <p>3.5. The pavilion contains a main function room and smaller studio spaces, all of which are outdated and in need of modernisation so they can be made available for wider community use.</p> <p>3.6. The grass pitches to the north of the site, across which the pavilion faces, provide the first team cricket square, which sits inside the painted athletics track, which is primarily used by the College to host its annual sports day. Over the winter months, the northern field is used for football.</p> <p>3.7. Towards the middle of the site are the all weather pitches which the College has developed. Further to the south is a former grass pitch, which was infrequently used and which the College allowed Network Rail to accommodate for a 2 year period to undertake bridge replacement works on the line between Catford and Bellingham. The condition of that area deteriorated significantly during its use by Network Rail and as such now requires significant investment before it can be used for sport.</p> <p>3.8. Back up at the NW corner of the site is the former groundsman's house, which stands close to the raised section of the South Circular with the public pedestrian access ramp linking through the subway to Catford Bridge extending across its front elevation. The house is now privately tenanted.</p> <p>3.9. Immediately to the west of the house and separating it from the adjoining railway line is a parcel of overgrown scrub land, which is also within the College's ownership, but which is inaccessible.</p> <p>3.10. With the exception of the all weather pitches, the sports facilities at the Jubilee Sports Ground are inefficiently arranged and there are large areas of land which are surplus to requirements and achieve little other than imposing a maintenance burden on the College. Moreover, in its current position, the pavilion has the effect of limiting capacity to the western side of the site and the College has been giving some initial thought to its replacement, relocation and enhancement.</p> <p>3.11. The image below comprises an extract from the existing adopted Policies Map. The site (excluding the overgrown scrub</p>		

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							land to the west of the groundsman's house) is currently designated Metropolitan Open Land (green shading), Urban Open Space (green hatching) and forms part of the Culverley Green Conservation Area (land inside the red line). The orange hatching running across the northern part of the site indicates the location of planned road improvement works, but there is no policy in the Core Strategy which seeks to deliver these works. 3.13. Below is an extract from the Environment Agency's Flood Map. This shows that the site is principally within Flood Zones 2 and 3 at the level of the playing fields. However, where the South Circular rises to cross the railway, land is in Flood Zone 1. The groundsman's house to the NW corner of the site is in Flood Zone 3. There are no statutory listed buildings within, or adjacent to the site.		
CON046	REP225	4TY OBO St Dunstan's Educational Foundation			2	Lewisham Today and Planning Ahead Deprivation and Inequality	4.2. At pg.33, paragraphs 2.6 – 2.8, the Draft Plan addresses the deprivation and inequality in Lewisham. It is explained that the Borough is in the top 20% most deprived authority areas in the country and the seventh most deprived Borough in London with child poverty being a significant issue with some of the highest levels in the country. 4.3. At paragraph 2.8, the Draft Plan explains that more than 50% of the Borough's adult population is either overweight, or obese with roughly 16% of adults being physically inactive. The issue of childhood obesity is also explained with 22% of reception aged children being overweight, rising to 38% in year 6. Children in the Borough's most deprived areas are twice as likely to be obese or overweight as other children. 4.4. Linked with these paragraphs is Figure 2.3, which shows levels of deprivation in Lewisham. It is highly relevant in the context of this Representation that the area around the Jubilee Sports Ground is in the top 10% most deprived parts of the Borough. The parts of the Borough immediately beyond this area are in the 20% to 30% most deprived parts of the Borough.	The Council notes the comments made in relation to the new Local Plan Lewisham Today and Planning Ahead, Deprivation and Inequality. For clarity, the referenced section of the new Local Plan seeks to set out the context for the Spatial Strategy, which follows. The quoted statistics provide a factual context for the new Local Plan. The Council considers this to be a sound approach.	No further action required in relation to the new Local Plan.
CON046	REP226	4TY OBO St Dunstan's Educational Foundation			2	HO 01	Draft Policy HO1 sets out to meet the Borough's housing needs, explaining that the London Plan's 10 year target (including any changes which are made through the review of that document) will be exceeded. The College supports this objective. 4.11. Part C of the policy seeks to increase housing supply, explaining that a "carefully managed" uplift in delivery will be achieved by directing housing to areas including proposed Regeneration Nodes. Whilst the College supports the proposal	The Council notes the comments and welcomes the broad support offered in relation to the new Local Plan Policy HO 01 Meeting Lewisham's housing needs. The Council considers that an approach that supports a higher quantum of new homes, than that identified through the objectively housing need calculation, will significantly boost housing delivery. In this	No further action required in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							to increase housing supply in Regeneration Nodes (where the site is located), it is unclear what is meant, or intended by “carefully managed”. It is considered that these words should be deleted from the policy.	<p>respect the Council has sought to identify an appropriate deliverable and developable buffer. The Council considers this approach sound.</p> <p>The specific comments made in relation to the new Local Plan Policy HO 01 C are noted and discounted. The Council considers that the wording, when read within the context of the wider Plan, is clear. In this respect, it is necessary that the Council, as the plan-making and decision-taking body manages the uplift in housing delivery (beyond the London Plan figure) to ensure successful place-making and minimise the risk of harm to Borough. The latter in respect of impacts upon, for example, infrastructure network capacity and visual character and appearance. The Council concludes that the wording is necessary and sound.</p>	
CON046	REP227	4TY OBO St Dunstan’s Educational Foundation			2	QD 04	<p>4.5. Draft Policy QD4 deals with building heights. At Part A the policy explains that a tall building in the Borough is one which is “substantially taller than their surroundings and cause a significant change to the skyline.” However, the policy then states “Within Lewisham Tall Buildings are defines as buildings which are 10 storeys or 32.8m measured from the ground level to the top of the building”. Part B of the policy then sets out “Tall buildings should only be developed in locations identified as appropriate for tall buildings on the Policies Map (i.e. Tall Building Suitability Zones). Development proposals for tall buildings outside of these zones will be resisted.”</p> <p>4.6. These parts of the draft policy are contradictory and if adopted in their current form would lead to uncertainty. If a proposed development was 33m tall, outside a Tall Building Suitability Zone but between sites containing 11+ storey buildings, the draft policy would set out to resist the proposal but fundamentally such height should be acceptable in townscape terms if a high quality design is proposed since the development would be neither substantially taller than its surroundings and would not cause a significant change to the skyline.</p> <p>4.7. Such a specific set of restrictions in the policy would act counter to the NPPF’s and London Plan’s requirements (as well as that outlined at Draft Policy QD6) that the development potential of a site should be optimised through a design-led</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 04 Building heights.</p> <p>The Council highlights that the new Local Plan’s approach towards tall new buildings is based on a comprehensive technical evidence base that considers a range of factors.</p> <p>For clarity, the London Plan Policy D9 Tall Buildings is clear in setting precisely what plan-makers should undertake when preparing new policy. In this respect, London Plan Policy D9 states that local plans should determine the locations where tall buildings are suitable, identify those locations and specify the maximum height that could be acceptable. The respondent’s comment about the London Plan’s use of the word “could” (at London Plan Paragraph 3.9.2) is noted and discounted. The Council suggests that this is an exercise in semantics that has no bearing on soundness.</p>	No further action required in relation to the new Local Plan.

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							<p>approach to deliver new homes, employment and good growth.</p> <p>4.8. The College objects to Part A of the draft policy and requests that it is modified to remove reference to a tall building being one which is 10 storeys or 32.8m in height.</p> <p>4.9. Figure 5.6 of the draft Plan (pg.96) show the Catford Tall Building Suitability Zone. This shows the Jubilee Sports Ground being surrounded by site allocations where development heights of up to 20 storeys will be supported. The College supports such developments coming forward in the area, but would suggest that the northern section of the Jubilee Sports Ground site should also be included in the proposed Zone. .</p>	<p>The new Local Plan's approach towards tall new buildings is consistent and in accordance with the specific requirements set out in to the London Plan. It is justified through a proportionate and comprehensive technical evidence base, and it provides an effective mechanism for decision-taking.</p> <p>The new Local Plan provides development partners and decision-takers the flexibility to consider proposals that optimise the development capacity of the site. The application of a master planning approach provides development partners to justify such proposals and decision-takers to consider them on their merits.</p> <p>For these reasons, the Council considers the policy sound.</p> <p>The Council notes the comments and support offered in respect of the new Local Plan Figure 5.6 Catford tall building suitability zone. The extent of the suitability zones identified in the new Local Plan under Figures 5.3 – 5.10 is an output from the technical assessment process, which explored the capacity of locations within Lewisham's to accommodate taller buildings/ vertical intensity. The respondent has not presented any technical evidence that supports the extension of the zones identified under Figure 5.6. Furthermore, as already noted by the Council, the Jubilee Sports Ground is designated in its entirety as Metropolitan Open Land, and as such is only appropriate for suitable uses identified under national planning policy. The respondent has not demonstrated any very special circumstances that would justify a departure from this approach.</p>	
CON046	REP228	4TY OBO St Dunstan's			2	CI 03	4.12. Draft Policy CI3 relates to sports, recreation and play and sets out to ensure that developments help to ensure that people of all ages and abilities have access to a wide range of opportunities for sports, recreation and play. Such developments are encouraged to maximise opportunities to	The Council notes the comments made in relation to the new Local Plan Policy CI 03 Sports, recreation, and play. The Council considers that the policy is sound. The policy already seeks to improve access to	No further action required in relation to the new Local Plan.

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		Educational Foundation					<p>provide new or improved community infrastructure and public realm enhancements to allow sport, recreation and play facilities to be reached safely and easily. Part C of the draft policy explains that where developments are located within areas deficient in play space, new housing development must provide demonstrable improvements in quantity and quality of play space.</p> <p>4.13. Figure 9.1 shows that the southern part of the Jubilee Sports Ground site is in an area deficient in play space.</p> <p>4.14. In the light of the acknowledged issue in the Borough of child and adult obesity, the College strongly supports the Council's proposed policy to encourage development to deliver enhanced access to play space. However, in the light of the objectives of the London Plan (see below), the College would recommend that the policy's objectives are expanded to encourage enhanced access to sports facilities in order to facilitate improved opportunities for participation in sport.</p> <p>4.15. London Plan Policy S5 relates to sports and recreation facilities and challenges Boroughs to ensure there is sufficient supply of good quality sports and recreation facilities with needs to be identified through audit work carried out during the Local Plan process. Where developments impact on sports facilities, applicants are required to show that proposals increase or enhance facilities in accessible locations, maximising the multiple use of facilities by schools, sports providers and community groups.</p>	<p>sports, recreation, and play infrastructure networks. Consequently, the suggested addition/ amendment is considered unnecessary for the purpose of soundness.</p> <p>The statement made in relation to the London Plan is noted.</p>	
CON046	REP229	4TY OBO St Dunstan's Educational Foundation			2	TR 01	<p>4.16. Draft Policy TR1 relates to sustainable transport and movement. Part C sets out that the land required for the construction and operation of the Borough's network of strategic and other transport infrastructure will be safeguarded, included the schemes listed in Table 12.1. That Table identifies a list of strategic transport schemes, including the re-routing of the A205 (South Circular) in Catford, which is identified as having a short timeframe for delivery.</p> <p>4.17. The explanatory text at paragraph 12.3 (pg.406) explains that the schemes listed in Table 12.1 will play a key role in supporting the delivery of the Borough's spatial strategy.</p> <p>4.18. As introduced above, the College supports the principle of the proposed re-routing of the South Circular and is engaging positively with the Council and TfL in respect of the necessary transfer of land ownership in order that the Council's vision can be delivered. However, it is imperative for the College that any proposal for the re-routing of the road</p>	<p>The Council notes the comments and broad support offered in relation to the new Local Plan Policy TR 01 Sustainable transport and movement.</p> <p>The Council has, in concert with its transport infrastructure network delivery partners, identified the necessary improvements required to support planned-for growth over the plan period. The realignment of the South Circular Road will secure improvements to the network, provide necessary capacity, help facilitate regeneration within Catford Town Centre (a Regeneration Node under the Spatial Strategy), and the delivery of site allocations.</p>	No further action required in relation to the new Local Plan.

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							guarantees safe pedestrian access from the main College site into the Jubilee Ground, including adequate crossing points with safe refuge and adequate entrance capacity to accommodate groups of students and allow them to leave the highway quickly and safely.	The specific comments relating to the retention of safe pedestrian access, from the main College Site, onto the Jubilee Sports Ground are noted. The new Local Plan actively seeks to extend and improve the Borough's sustainable travel networks – inclusive of pedestrian routes. The site allocation, under Policy LCA SA 20, states that the implementation of the route realignment will secure a better flow of pedestrians and cyclists along the new road. The Council and its infrastructure delivery partners (Transport for London) are working that the improvements to the South Circular Road meet the needs of residents, communities, and businesses.	
CON046	REP230	4TY OBO St Dunstan's Educational Foundation			3	LCA SA 19	Draft Site Allocation 19: Laurence House and Civic Centre proposes to allocate the Council office and civic centre site for mixed use development, including 262 homes together with c.13,000sqm of employment space and c.6,000sqm of main town centre use floor space. 4.20. As noted at draft paragraph 14.109, this allocation is only deliverable as part of and following the re-routing of the South Circular across the Jubilee Sports Ground site. 4.21. As introduced above, the College supports this allocation and the Council's proposals to regenerate Catford town centre.	The Council notes and welcomes the support offered in relation to the new Local Plan Policy LCA SA 19 Laurence House and Civic Centre. The regeneration of Catford Town Centre is an important component of the new Local Plan's Spatial Strategy and will make a positive contribution towards meeting the Borough's needs.	No further action required in relation to the new Local Plan.
CON046	REP231	4TY OBO St Dunstan's Educational Foundation			3	LCA SA 20	4. The Draft Local Plan 4.1. This section identifies the draft policies of greatest relevance to the Jubilee Sports Ground site and the College's proposals, which are further explained below. 4.22. Draft Site Allocation 20: South Circular proposes to allocate the northern section of the Jubilee Sports Ground to facilitate the re-routing of the South Circular. This opportunity was only identified in 2022 and included in the Regulation 19 version of the Draft Plan. 4.23. Consistent with the position set out above in connection with Draft Policy TR1, the College supports plans to re-route the South Circular subject to adequate and safe access being provided into the Jubilee Sports Ground. 4.24. It is noted that the draft allocation proposes to remove all land within the red line area from the MOL, including the majority but not all of the groundsman's house, which is now privately tenanted. As has been noted elsewhere in this	The Council notes the comments made in relation to the new Local Plan Policy LCA SA 20 South Circular. The broad support offered in relation to the proposed route realignment is welcomed. The Council also notes the comments seeking the retention of safe pedestrian access, from the main College Site, onto the Jubilee Sports Ground. The new Local Plan actively seeks to extend and improve the Borough's sustainable travel networks – inclusive of pedestrian routes. The site allocation, under Policy LCA SA 20, states that the implementation of the route realignment will secure a better flow of pedestrians and cyclists along the new road. The Council and its infrastructure delivery partners (Transport for London) are working that the improvements to the	No further action required in relation to the new Local Plan.

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							<p>Representation, the College is concerned about the impact of the re-routed road on the quality of accommodation within this house, which is already blighted by the existing road alignment and location of the public ramp access to the subway. With part of the house seeming to remain within the MOL, the College will be left with a further blighted asset which will become very difficult to tenant. Moreover, the policy position will be such as to prevent the College from being able to resolve matters through the submission of an ad hoc planning application.</p> <p>4.25. The Lewisham Local Plan Metropolitan Open Land Exceptional Circumstances Paper (February 2023) prepared by the LPA proposes the release of a parcel of MOL at Catford, part of which is land owned and controlled by the College, principally for the purpose of accommodating the realignment of the South Circular (A205) which will enable the “comprehensive regeneration of Catford major town centre”. This is addressed further in section 5 (below) of this submission.</p> <p>4.26. The College supports this proposal, and agrees that there are “exceptional circumstances” to justify the release of MOL. However, the College considers that the boundary should be realigned further south so as to release a small additional amount of [previously developed] land on the northern edge of the large area of MOL including the whole of the groundsman’s house, its plot and land extending eastwards. This will allow the delivery of new housing led mixed use development on land fronting the newly re-routed highway together with a replacement pavilion located more centrally within the site and significant investment in the sports facilities at the site. The respective areas proposed in the Lewisham background paper and that proposed in the modification suggested by the College are shown on drawing no. 23.007 SK004 P2 – Proposed MOL Boundary, which is submitted alongside this Representation.</p> <p>4.27. The LPA’s proposed MOL boundary shown around the draft allocation in the Regulation 19 Local Plan does not follow any logical physical feature within the site, but instead seems to have been arbitrarily drawn. London As discussed below, while the College supports the principle of release of MOL to enable the realignment of the A205 and the regeneration of Catford town centre, it strongly objects to the new MOL boundary as currently proposed. The College requests that the proposal to release part of the MOL is modified by being redrawn with a slightly different boundary, enabling the</p>	<p>South Circular Road meet the needs of residents, communities, and businesses.</p> <p>Mapping The comments made in respect of the red-line area are noted. For clarity, the precise extent of land required for the proposed realignment is currently unknown and will only be confirmed through the forthcoming detailed design stage of the delivery process. The area identified under new Local Plan Policy LCA SA 20 is indicative and identifies the maximum possible extent required to deliver the proposed improved alignment. It is anticipated that the actual extent required will be significantly less than that identified on the red-line area.</p> <p>It is the shared objective, of the Council and its partners, to only de-designate the minimum amount of land required from the Metropolitan Open Land. This is a component of the very special circumstances justification that supports the release of land from the Metropolitan Open Land. The policy clearly states that any land released from the Metropolitan Open Land will be solely to meet the objective for the re-routing of the A205 South Circular. This is to ensure that any potential harm to open character and appearance of the Metropolitan Open Land is minimised.</p> <p>Potential Blight The Council notes and discounts the suggestion that the policy and the proposed infrastructure highway and town centre improvements “blight” development potential across the Metropolitan Open Land located within the St Dunstan’s College (the Jubilee Sports Ground).</p> <p>For clarity, the Council highlights that the site is entirely comprised of Metropolitan Open Land and is also identified as open</p>	

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							<p>satisfactory redevelopment of the area of land adjoining the new highway and providing revised access to the sports ground together with additional open playing fields on the western part of the site, which is currently occupied by the pavilion, which is proposed to be demolished and replaced in a more central location, as shown at drawing number 23.007 SK003 P2 – Proposed Masterplan.</p> <p>4.29. The net impact of the proposals are neutral/positive in respect of the openness of the site.</p> <p>4.30. The justification for the College’s amendment of the proposed modification to the draft Reg 19 Local Plan is largely self-evident from the submitted plans and the Feasibility Study document prepared by Hollaway Studio and can be readily understood and appreciated on-site.</p> <p>4.31. The policy test for release of MOL is the “exceptional circumstances” test in paragraph 140 of the Framework.</p> <p>4.32. The Courts have established that this test, which is considered in the context of plan making, is a less stringent test than the “very special circumstances” test¹ which applies to applications for planning permission.</p> <p>4.33. The benefits of the College’s proposal include the provision of new and additional sports pitches, a new pavilion, new housing, new commercial spaces and essential new access to the Jubilee Sports Ground. Together these also enable the strategically important realignment of the South Circular and accompanying regeneration of Catford town centre, meaning that the exceptional circumstances test is amply met.</p> <p>4.34. The new housing will provide much needed new homes in a highly sustainable location, close to public transport hubs and all the facilities of the regenerated town centre.</p> <p>4.35. The additional sports fields will provide an important enhancement to the College’s ability to outreach to the local community.</p> <p>4.38. Policies Map changes are shown in a separate consultation document. An extract showing the proposed designation of the Jubilee Sports Ground is provided below for ease of reference. A detailed map has not been produced by the Council showing the precise alignment of the new MOL boundary, but based on the information provided as part of proposed allocation 20, it is understood that the new MOL</p>	<p>space protected under the new Local Plan Policy GR 02 Open Space. Consequently, the development potential of the site is limited to open space use/ uses compatible with Metropolitan Open Land. The London Plan Policy G3 Metropolitan Open Land states – “<i>MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt</i>”.</p> <p>In turn the NPPF Paragraphs 147 – 151 provide guidance on the very special circumstances when development could be considered. The Council notes and highlights that local transport infrastructure is identified (at NPPF Paragraph 150).</p> <p>The suggestion that the groundman’s house is already blighted by the current alignment and proximity of the A205 is noted and discounted. The Council notes that the house dates from the second half of the twentieth century and as such post-dates the A205 and the adjoining railway line.</p> <p>Metropolitan Open Land - Very Special Circumstances The comments and support offered in relation to the very special circumstances justifying the release of Metropolitan Open Land required to deliver the proposed realignment of the South Circular Road are noted and welcomed.</p> <p>Metropolitan Open Land – Proposed Further Release The Council notes the suggestion that further land, within the extent of the Jubilee Sports Ground, be released from the Metropolitan Open Land. The Council notes that this proposal exceeds the justification made under very special circumstances, which supports a limited necessary release to deliver the proposed highway infrastructure improvements. The</p>	

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							<p>boundary will run east to west across the northern part of the Jubilee Sports Ground, removing the existing vehicular entrance to the site from the MOL together with most, but not all of the groundsman's house.</p> <p>4.40. As explained above, this alignment coupled with the re-routing of the South Circular will have the effect of further blighting the groundsman's house and will render that part of the site undevelopable, meaning the situation will not be possible to resolve without the submission of a complex planning application and the detailing of a very special circumstances case.</p> <p>4.41. As is explained in the following section of this Representation, it is considered that the currently proposed designation of the Jubilee Sports Ground fails to take into account the role the site can play in enhancing the town centre, the potential for the site to deliver significantly enhanced access to a regionally important sports facility and the importance of the site to meeting the Draft Plan's Spatial Strategy. Accordingly, the College strongly objects to the proposed MOL boundary in its currently proposed alignment across the northern part of the Jubilee Sports Ground. However, the College outlines below how a slight adjustment to the alignment of the proposed MOL boundary would resolve concerns and would facilitate the delivery of both the College's vision for the future of the sports facility and the successful delivery of the re-routing of the South Circular.</p>	<p>Council notes that the respondent suggests that their proposal is justified on grounds that it secures new housing, additional sports pitches, a new pavilion, new commercial spaces, and essential new access to the Jubilee Sports Ground.</p> <p>The Council discounts this proposal as it is not justified neither in the sense of very special circumstances nor exceptional circumstances.</p> <p>The Council acknowledges that there may be circumstances where the release of Metropolitan Open Land or Green Belt may be considered. Such circumstances could arise where there is an insufficient supply of deliverable and developable land to meet objectively assessed housing need. That is not the case here – as the Council can demonstrate that the new Local Plan will deliver more new homes than required by the London Plan.</p> <p>Furthermore, the Council considers that the harm of releasing additional Metropolitan Open Land, explicitly for built development, would considerably outweigh any potential benefits. For these reasons the Council does not support the respondent's proposal to increase the extent of land to be released from the Metropolitan Open Land.</p>	
CON046	REP232	4TY OBO St Dunstan's Educational Foundation			3	LCA SA 20	<p>5. MOL Release</p> <p>5.1. This section of the Representation recaps the Council's proposal and exceptional circumstances case and then explains the College's proposed amendments to the Draft Local Plan. If the College's proposal is adopted then the concerns explained above will have been successfully resolved and will facilitate development at the Jubilee Sports Ground site which will fundamentally overhaul and enhance the facility with wide reaching benefits for the College and the local communities.</p> <p>5.2. As is explained in more detail below, the College's proposal seeks a slight adjustment to the MOL boundary currently being proposed by the Council in the draft Local Plan.</p>	<p>The Council notes the detailed comments relating to the new Local Plan Policy LCA SA 20 South Circular, which seek to justify expanding the extent of land to be released from the Metropolitan Open Land. The respondent's proposal seeks to utilise the expanded release to deliver new housing, additional sports pitches, a new pavilion, new commercial spaces, and essential new access to the Jubilee Sports Ground.</p> <p>As stated previously, the justification for releasing land from the Metropolitan Open Land designation (at the Jubilee Sports</p>	No further action required in relation to the new Local Plan.

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							<p>As such, this section also sets out the College’s exceptional circumstances case.</p> <p>5.3. In February 2023, LB Lewisham published a Metropolitan Open Land Exceptional Circumstances Paper (“the Paper”), which is a background paper which helps inform the preparation of the draft Local Plan. In part, the Paper presents the Council’s exceptional circumstances case for the release of a small parcel of MOL land at Catford.</p> <p>5.4. The Paper explains at para. 2.6 that case law and Local Plan EiP precedents in relation to MOL release suggest that any justification must be responsive to local condition, taking into account a range of factors including unique or significant local needs for certain types of development or infrastructure; tightly drawn MOL boundaries constraining other sites; and the opportunity to deliver social infrastructure which would bring about long-term benefits for local residents.</p> <p>5.5. The Paper then sets out at para. 2.7 that the bar for demonstrating exceptional circumstances case is lower than the bar for demonstrating “very special circumstances” in the context of a planning application.</p> <p>5.6. At Section 3 the Paper addresses the proposed release of MOL to the north of the Jubilee Sports Ground site. It explains that the new Local Plan proposes to de-designate a 0.49ha parcel of land, which represents only c.5% of the overall MOL area at the Jubilee Sports Ground (noting that the final proposed boundary remains to be confirmed).</p> <p>5.7. At para. 3.4 the Paper explains, “A small loss of MOL is required to deliver the comprehensive regeneration of Catford major town centre by accommodating the realignment of the South Circular. Re-routing this main road is an integral component to unlocking development within the town centre...” Paragraph 3.5 continues, “...the case for exceptional circumstances is that without a small loss of MOL, there would be adverse implications for sustainable development as the comprehensive regeneration of Catford town centre cannot be fully realised, meaning the Council will fall significantly short of its development requirements and local residents will not experience the long-term benefits by having better access to both green and social infrastructure in a major centre.</p> <p>The College’s Vision</p>	<p>Ground) is made under very special circumstances to solely deliver necessary improvements to transport infrastructure. The proposal seeks to minimise the scale of release – limited to what is necessary to provide for the realigned route of the A205 South Circular Road. The red-line area identified under new Local Plan Policy LCA SA 20 is indicative and identifies a maximum possible extent of release. The full extent will be identified through the detail design process and progressed through the statutory processes associated with the delivery of new transport infrastructure. This is inclusive of any necessary compulsory purchase process. It is anticipated that the extent of released land required for the improvement will be significantly less than that indicated on the red-line map.</p> <p>The Council notes the College’s vision for enhancing and improving its sports provision – most notably the delivery of a new pavilion. Within this context, the Council is keen to work with the College to explore how improvements to open space infrastructure could be delivered in accordance with the Metropolitan Open Land designation.</p> <p>The Council considers that the application of a high-quality design and master planning process may provide an appropriate solution for the site, which is in accordance with its continued status Metropolitan Open Land. The Council notes that the respondent considers that additional land release (from the Metropolitan Open Land) is necessary to deliver new housing that can be utilised to cross-subsidise improvements in open space provision. Although this may be a consideration for the College, it is not a justification that supports a case of very special circumstances. As stated previously, there is no housing need</p>	

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							<p>5.8. The College has been in the process of reviewing how it currently uses the Jubilee Sports Ground, what sports should continue to be provided for, which can be relocated to the main school site and how the use of the site for sport can be optimised in future years. If the College's proposal is adopted then it is anticipated that the vision for the site could be realised within 5 years.</p> <p>5.9. Given the limited use for athletics² (which can in any event would be better accommodated by working in partnership with the nearby Ladywell Track and Field site), the College's proposal is for the northern field to continue to provide a cricket square with additional football pitch capacity around it. The College's vision is for the site to become the main hub for football in SE London with significantly enhanced pitch quality and capacity together with a new pavilion which will allow for improved access for the relevant communities, external clubs and organisations. In recent years, the College has already begun a successful partnership with Tottenham Hotspur Football Club, based at the Jubilee Sports Ground, bringing significant benefits not only to the College but to local community and charitable groups. The College considers that the facility improvements contained within this vision will further accommodate such links with Premier League and EFL clubs, bringing significant benefits to the Catford community.</p> <p>5.10. Alongside this, the College wants the site to be the focus for alumni events. At present, alumni events are either hosted at the main College site, or at the Old Dunstonian's Club in Park Langley (LB Bromley). A new pavilion with enhanced changing facilities and function space would also allow for extended use by the local community.</p> <p>5.11. For this vision to be delivered, the existing inefficient and outdated pavilion needs to be replaced with a modern, accessible³, state of the art and environmentally sustainable facility with separate College and community changing facilities, new function space, a gym and studios.</p> <p>5.12. The new pavilion will completely transform how the site can be used with much enhanced access being given to local schools, clubs and communities year round.</p> <p>5.13. This Representation is supported by an initial vision for the site's future layout, showing the newly re-routed South Circular to the north, a new vehicular entrance to the site from Canadian Avenue, which leads to a new pavilion in the heart of</p>	<p>justification to support an expanded release.</p> <p>The comments made in relation to the quality of the Metropolitan Open Land are noted and discounted. The Council considers the Metropolitan Open Land at the Jubilee Sports Ground to provide an important open space transition between Catford Town Centre and its adjoining residential areas to the west and south. Initial development visualisations prepared by the respondent suggest that an expanded land release (from the Metropolitan Open Land) would be maximised for its development potential. The visualisations, in concert with the submitted representation illustrate a significant vertical intensification across the entirety of the area proposed for released. The Council considers that this would have a wholly harmful impact upon the townscape and the Metropolitan Open Land. The Council concludes that the proposal is unsound.</p>	

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							<p>the site with enhanced pitch capacity being delivered as a result.</p> <p>5.14. Through the changes outlined below and on the attached plans, there is an exciting and truly unique opportunity to transform the relationship between the sports ground and the town centre, bringing the MOL into the town and creating a highly accessible, high quality, inclusive sports hub in the very heart of a regenerated major town centre.</p> <p>5.15. The costs associated with delivering this vision are extremely high. As has been explained before, the College is a charity and so would be unable to afford to undertake such significant investment and development from financial reserves. It is important to note that whilst St Dunstan's College successfully positions itself as sector-leading, independent school that runs extensive means-tested bursary schemes to ensure its ongoing commitment to being a socially, intellectually and academically diverse school, unlike many independent schools, it does not have access to substantial endowments.</p> <p>5.16. In the previous sections, the College's concerns regarding the proposed new MOL boundary have been articulated. This currently proposed boundary line will have the effect of blighting the groundsman's house and constraining its development potential. Moreover, the College has explained that the existing site is inefficient with large areas of land which are surplus to requirements and impose a management and cost burden.</p> <p>5.17. Accordingly, the College's proposal is that the Council's suggested MOL boundary should be slightly adjusted, allowing for a small proportion of additional release of land from the MOL in order to create a development site between the re-routed South Circular and the re-arranged, consolidated and qualitatively and quantitatively enhanced sports facility.</p> <p>5.18. The College has commissioned Hollaway Studio to prepare a set of drawings which accompany this Representation and which show the existing and proposed MOL boundaries and which indicate the scale and type of development which could be delivered within the site. Alongside this, they have identified pitch locations with run off areas which comply with Sport England guidance. Their indicative layout shows the pavilion being relocated to the heart of the site with this releasing space to the west for additional pitch capacity and their layout shows 2 additional</p>		

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							<p>pitches being delivered to the south of the site on the land previously used by Network Rail.</p> <p>5.19. The College's vision requires the draft MOL line (which the Council has already noted may be subject to adjustment) being moved 12m to the south. This change will release an additional 2,040sqm of MOL for development across the site's frontage. This very small additional release amounts to only around 2% of the existing MOL area.</p> <p>5.20. In total, therefore, the Council's proposal together with the additional release proposed by the College would amount to the de-designation of approximately 0.69ha of MOL across the northern part of the site, representing only approximately 8% of the total area.</p> <p>The exceptional circumstances case 5.21. The Council's exceptional circumstances case for the release of a 0.49ha parcel of land is that this is essential in order to deliver the re-routing of the South Circular, the regeneration of Catford town centre and to allow the Council to deliver sufficient housing to meet local needs. There are additional wide reaching benefits associated with the College's proposal, which are set out in the table below.</p> <p>5.22. Before assessing these benefits, however, it is important to develop an understanding of the subject site's role in the MOL and the extent to which it meets the relevant tests, which are outlined at Policy G3 of the London Plan. Part B of the policy sets out 4 criteria for including land within the MOL. Land must meet only 1 of these in order to be designated such but clearly where land does not meet any of the criteria, the land should not be so designated. These criteria are set out below together with an assessment of whether the additional land to be released meets these.</p> <p>5.23. First land should contribute to the physical structure of London by being clearly distinguishable from the built up area. The area of land which the College proposes to be released is not "clearly distinguishable" from the built up area. A large part of the land is already developed, containing a house, sub-station and office, sweeping areas of hardstanding forming the access road into the site and c.2m tall security fencing.</p> <p>5.24. The land to be released from the MOL is not clearly distinguishable from the surrounding urban area. The land is already largely developed, including for housing use and is covered in large areas of hardstandings with fencing and gates.</p>		

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							<p>5.25. When stood within the area of land which is proposed to be released from the MOL, the impression is that you are standing in an urban context with the A205 crossing to the north, the civic offices and core of the town centre to the east and the large commercial retail sheds beyond the railway lines to the west, all being prominent in views.</p> <p>5.26. Within this part of the site, land forms part of the urban context. It is not clearly distinguishable from it and as such, this first criterion is not met.</p> <p>5.27. Second, land should include open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London. This criterion is clearly not currently met at the site (although notably could be if the College's proposal is adopted). The site is privately owned and operated and whilst the College allows access to the facilities, it would be incorrect to conclude that they are used by the whole or significant parts of London. As discussed above, the area which the College proposes should be removed is surplus to requirements and does not provide any pitch capacity.</p> <p>5.28. Third, land must contain features or landscapes of either national or metropolitan value. This criterion is not met in the case of the Jubilee Sports Ground.</p> <p>5.29. Finally, land must form part of a strategic corridor, node or link in the network of green infrastructure and meets 1 of the first 3 criteria. Thus, in the event that the site is deemed to form part of a strategic corridor, but does not meet any of the first 3 criteria, the land should not have been designated MOL.</p> <p>5.30. Based on the above assessment, it is the College's position that the part of land at the Jubilee Sports Ground proposed to be removed from the MOL does not currently meet any of the tests outlined at London Plan Policy G3. However, it is the College's proposal that through the dedesignation of a small amount of surplus land for development, the Jubilee Sports Ground can be transformed and can clearly meet the second criterion.</p> <p>5.31. As introduced above, the table below outlines the key benefits which can already be identified if the College's proposed adjustment to the MOL is to be adopted.</p>		

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							<table><tr><th>Benefit</th><th>Explanation</th></tr><tr><td>Enhancing and expanding the College's charitable and community outreach programme</td><td><p>At pgs.3-4 of this Representation, the College's charitable endeavours and community outreach work is introduced and summarised. That which is set out above is a summary of only the last year's work.</p><p>If the College's proposal is adopted, the Jubilee Sports Ground will be the focal point for a far expanded programme of work with the local community in Catford and Lewisham more generally as well as with alumni. There will be additional capability to allow use of the pitches by other local schools and community groups to ensure enhanced life opportunities for residents in one of the top 10% most deprived parts of a Borough, which itself is among the most deprived in London and the country as a whole.</p></td></tr><tr><td>Enhancing the site's role in the MOL</td><td><p>Through the development, expansion and qualitative and quantitive enhancement of the sports facilities at the site, as well as the development facilitating significantly enhanced access to the sports facilities by the community, the site will meaningfully meet the second criterion at London Plan Policy G3.</p><p>As explained above, the College's vision is for the site to be the main hub for football in SE London, attracting children's, men's and women's football teams as well as supporting other sports and the expansion of the College's pioneering gender natural sports programme.</p></td></tr><tr><td>Providing enhanced access to sport and tackling health and obesity</td><td><p>A future development proposal can be supported by a Health Impact Assessment, but the draft Local Plan identifies concerning statistics around obesity in the Borough with more than 50% of adults being overweight or obese, with 22% of reception aged children being overweight, rising to 38% in year 6.</p><p>There is a clear and urgent requirement to encourage increased participation in sport in the Borough, which begins through the delivery of enhanced facilities with wider public access.</p><p>If a small amount of additional land is released from the MOL, the College will be able to deliver meaningful development across the site's frontage which will cross-subsidise the delivery of the enhanced sports facilities at the site as well as the new pavilion with gym and studio facilities.</p></td></tr></table>	Benefit	Explanation	Enhancing and expanding the College's charitable and community outreach programme	<p>At pgs.3-4 of this Representation, the College's charitable endeavours and community outreach work is introduced and summarised. That which is set out above is a summary of only the last year's work.</p> <p>If the College's proposal is adopted, the Jubilee Sports Ground will be the focal point for a far expanded programme of work with the local community in Catford and Lewisham more generally as well as with alumni. There will be additional capability to allow use of the pitches by other local schools and community groups to ensure enhanced life opportunities for residents in one of the top 10% most deprived parts of a Borough, which itself is among the most deprived in London and the country as a whole.</p>	Enhancing the site's role in the MOL	<p>Through the development, expansion and qualitative and quantitive enhancement of the sports facilities at the site, as well as the development facilitating significantly enhanced access to the sports facilities by the community, the site will meaningfully meet the second criterion at London Plan Policy G3.</p> <p>As explained above, the College's vision is for the site to be the main hub for football in SE London, attracting children's, men's and women's football teams as well as supporting other sports and the expansion of the College's pioneering gender natural sports programme.</p>	Providing enhanced access to sport and tackling health and obesity	<p>A future development proposal can be supported by a Health Impact Assessment, but the draft Local Plan identifies concerning statistics around obesity in the Borough with more than 50% of adults being overweight or obese, with 22% of reception aged children being overweight, rising to 38% in year 6.</p> <p>There is a clear and urgent requirement to encourage increased participation in sport in the Borough, which begins through the delivery of enhanced facilities with wider public access.</p> <p>If a small amount of additional land is released from the MOL, the College will be able to deliver meaningful development across the site's frontage which will cross-subsidise the delivery of the enhanced sports facilities at the site as well as the new pavilion with gym and studio facilities.</p>		
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							<p>Enhanced football provision in the Borough</p> <p>The Council's Playing Pitch Strategy (June 2019) sets out at Table 3.1 that although the quality of football across the Borough is good with no poor pitches being identified, there are a number of sites which are close to the poor rating. It goes on to say that there is a large amount of deficit in the Borough for pitches (i.e. a quantitative deficit) with only 3 sites providing pitches with a long term security use agreement. As a result, the Strategy notes that the sites have no spare pitch capacity during the peak period and thus there is no prospect for growth.</p> <p>If the site is developed along the lines indicated by the College, it can provide additional capacity and access so desperately in need in the Borough.</p> <p>Enhancing community facilities</p> <p>There are spaces within the existing pavilion which can be used by the local community for functions, events and meetings, but the facility is now at the end of its economic lifespan and is in need of replacement.</p> <p>The proposed development to the front of the site would fund the facilities that will be available for use by the school community (including alumni) and the communities in Catford, Lewisham and beyond. The proposed new pavilion would enhance viewing and surveillance on a centrally located new site between pitches</p> <p>Resolving the blighted groundsman's house and releasing other unprotected land for development</p> <p>Without the slight adjustment to the MOL boundary, the groundsman's house will become blighted and there would be more limited opportunity for this to be resolved through the submission of a planning application.</p> <p>If the College's proposed boundary is adopted, there will be no barrier to the principle of the redevelopment of that site to deliver housing and commercial spaces.</p> <p>Moreover, the change would facilitate the recycling of previously developed land for housing, employment and other uses in a highly sustainable and accessible location.</p> <p>Delivering housing, including affordable housing</p> <p>The initial feasibility proposal prepared by Hollaway architects has been designed around the proposed plans for the re-routed South Circular. It is clear that the site could accommodate a significant number of homes, making an important windfall contribution towards housing and affordable housing delivery in Lewisham.</p> <p>Enhancing the public realm and providing access to additional public open space</p> <p>The Hollaway proposal indicates a substantial gap between the blocks, which is proposed to comprise new high quality public realm, open space and playspace as well as forming an attractive pedestrian entrance into the Jubilee Sports Ground site direct from the town centre.</p> <p>Delivering new commercial and educational space and economic growth</p> <p>The proposed NW block would likely contain a mix of educational or school administration space at ground floor level within the sports ground site and commercial space above at upper ground level where the South Circular rises to cross the railway.</p> <p>Commercial space would also be proposed at ground floor level in the NE block.</p> <p>The delivery of these spaces would improve the town centre, creating additional jobs and economic growth through the construction and operational phases of the development.</p> <p>Enhancing the regeneration of the town centre through improved legibility and linkages</p> <p>Linked with the above, the development of the northern part of the site would enhance legibility along the south side of the town centre, creating clear visual links between the otherwise dispersed parts of the extended Catford town centre.</p> <p>The development would also facilitate new functional and physical links between the town centre and the MOL, which currently do not exist.</p> <p>Delivering an improved, environmentally sustainable pavilion</p> <p>The existing pavilion is outdated and of an unsustainable design. By contrast a new pavilion would be of a highly sustainable design and construction, being energy efficient and thus reducing the school's carbon footprint. Unlike the existing facility, the new pavilion would also provide an inclusive, accessible space, available for all to use.</p> <p>Enhanced biodiversity and urban greening</p> <p>The development of the site presents a further opportunity to extensive landscaping around the site potentially to include substantial tree and hedgerow planting and the formation of ecological areas, particularly towards the south of the site along the bank of the Ravensbourne River. It is anticipated that the development would present an opportunity for significant biodiversity net gains and enhanced urban greening.</p>		
							5.32. The raft of tangible benefits outlined above will only be realised if the slight MOL boundary adjustment advocated by		

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							the College is supported. If the status quo is maintained, the opportunity to realise these significant public, social, environmental and economic benefits will be lost.		
CON046	REP233	4TY OBO St Dunstan's Educational Foundation			3	LCA SA 20	<p>6. Conclusion</p> <p>6.1. The College strongly supports, in principle, the Council's proposals for Catford town centre and the realignment of the A205 South Circular in the Regulation 19 draft Local Plan.</p> <p>6.2. The College also strongly supports the release of part of the Jubilee Sports Ground from MOL.</p> <p>6.3. The College does not support the currently proposed southern boundary of the proposed released area, which will cause blight to the College's land, including the groundsman's house.</p> <p>6.4. Accordingly, the College proposes an alternative, slightly enlarged area of released land, which is still principally on previously developed land, which should be released from the MOL, whilst retaining and enlarging the open area of pitches on the College's site.</p> <p>6.5. The College's proposals would deliver additional benefits in the form of a housing led mixed use development on the northern edge of the site. The overall effect of such a development on openness would be neutral.</p> <p>6.6. The development of housing in this highly sustainable and accessible location would enable the delivery of improved sports facilities at the site together with a new pavilion. The new pavilion would provide an inclusive and accessible space and given the additional changing facilities which would be provided, the College would be able to expand significantly the community outreach programme which operates at the site, allowing much enhanced access to the new and improved facilities.</p> <p>6.7. Exceptional circumstances exist to support the College's proposals for release of land from the MOL and the redevelopment of the pavilion.</p> <p>6.8. The College urges the Council to accept and support its proposals and to make appropriate modifications to the draft Local Plan accordingly</p>	<p>The Council notes the respondent's concluding statement in respect of the new Local Plan Policy LCA SA 20 South Circular.</p> <p>The Council concludes that the new Local Plan is sound and that no further changes are necessary.</p> <p>The respondent's proposal to extend the extent of land to be released from the Metropolitan Open Land is not supported. There are no very special circumstances to justify the proposal and there is a significant risk that the resulting development (of the released land) would have a wholly harmful impact upon the Metropolitan Open Land and the wider townscape. There is no housing land supply justification to support the proposed expansion of Metropolitan Open Land release.</p>	No further action required in relation to the new Local Plan.
CON046	REP234	4TY OBO			3	LCA SA 21	4.36. Draft Site Allocation 21: Wickes and Halfords, Catford Road proposes the redevelopment of the existing site to the west side of the Jubilee Sports Ground to deliver 512 homes together with c.9,000sqm of employment space and	The Council notes and welcomes the support offered in relation to the new Local Plan Policy LCA SA 21 Wickes and Halfords, Catford Road.	No further action required in relation to the new Local Plan.

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		St Dunstan's Educational Foundation					c.3,000sqm of main town centre use floor space. The College supports this allocation and the contribution the redevelopment of this site will have to the regeneration of Catford town centre. The College notes the allocation requires the delivery of improved connections between this site and the stations to the north and supports plans which will improve the pedestrian environment and connections along this part of the South Circular.		
CON047	REP235	Montagu Evans OBO Royal London Mutual Insurance Society Limited			3	LCA SA 22	<p>On behalf of our client, Royal London Mutual Insurance Society Limited ("RLMIS" / "Client"), we write to submit representations to the consultation on the Lewisham Local Plan Proposed Submission Document (Regulation 19) in relation to Ravensbourne Retail Park (the "Site"). These representations include a Proposed Site Capacity Document prepared by Patel Taylor Architects.</p> <p>These representations are in support of Site Allocation 22: Ravensbourne Retail Park and we support the Site's inclusion in the final Local Plan once adopted for the reasons set out in this letter. Notwithstanding this, we consider that there are necessary amendments to the draft site allocation in order to ensure the soundness of the Local Plan.</p> <p>Background On behalf of RLMIS, Montagu Evans has been proactively engaged in the ongoing Local Plan making process. Detailed representations were submitted on 9 April 2021 in response to the Lewisham Local Plan 'Main Issues and Preferred Approaches document' (Regulation 18), within which the Site was subject to a draft allocation, "Emerging Allocation - Lewisham Central Area 18: Ravensbourne Retail Park" which proposed the residential-led, mixed-use redevelopment of the Site.</p> <p>Representations were also submitted on 9 June 2022 by Montagu Evans in response to the consultation on the Lewisham Tall Buildings Study Addendum dated May 2022 with reference to this site.</p> <p>This is a genuine development site that RLMIS is committed to bringing forward in the long-term to deliver a successful residential-led redevelopment. RLMIS have also been engaged in pre-application discussions with the Lewisham Planning and Regeneration Teams since 2021 to discuss options for the redevelopment of this Site. These representations are informed by the feedback that we have received during these pre-application discussions.</p>	<p>The Council notes Montagu Evan's introductory comments including background, site and policy context and emerging allocation, Appendix 1 and other supplementary material.</p> <p>The Council welcomes the support offered in relation to the new Local Plan Policy LCA SA 22 Ravensbourne Retail Park.</p> <p>The Council remains committed to working with development partners to facilitate the delivery of planned-for growth across the Borough – inclusive of meeting the housing, employment, town centre, retail, and infrastructure network needs of residents and communities. The Council considers that the new Local Plan, through its spatial strategy, site allocations and planning policies provides a sound platform for securing this objective – both through plan-making and decision-taking.</p> <p>The Council encourages development partners, who are genuinely interested in bringing sites forward, to engage positively in the plan-making and subsequent decision-taking processes to secure good quality development and successful place-making.</p>	<p>No further action required in relation to the new Local Plan. Although Officers are not proposing that any modifications be made in respect of the site allocation specific development capacities, the Council could consider undertaking a separate exercise to identify and assess the possible uplift that higher intensity development could offer. This could inform a parallel decision/discussion on whether the Council's proposed 5% buffer is sufficient to secure a sound new Local Plan. The possible assessment of site uplift should seek to identify a RAG rate for each site's capacity to accommodate higher density and potentially taller development. The Council could seek to deploy this, if necessary, either in response to Inspector's MIQs or at the hearing sessions.</p>

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							<p>The Site</p> <p>The Site is located circa 290m north of Bellingham Train Station. It falls outside the Bromley Road Strategic Industrial Land (“SIL”) which is located adjacent to the north-western and southern boundaries. The Site also abuts residential development to the north-east, east and west. The Site itself covers an area of 2.71 hectares comprising units one to five of Ravensbourne Retail Park, along with the associated hardstanding car park. These units are currently in use for Retail and Leisure (Gym) purposes totalling 6,729 sqm (GIA), with the split outlined in Figure 1 below.</p> <p>Figure 1 – Split of Uses and Areas</p> <table><tr><th>Unit</th><th></th><th>GIA (Sqft)</th><th>GIA (Sqrm)</th></tr><tr><td>1</td><td>Wren Kitchens</td><td>14,994</td><td>1393</td></tr><tr><td>2</td><td>B&M Retail Ltd</td><td>17,481</td><td>1624</td></tr><tr><td>3</td><td>Tapl</td><td>9,937</td><td>923</td></tr><tr><td>4</td><td>Dunelm</td><td>20,010</td><td>1859</td></tr><tr><td>5</td><td>The Gym</td><td>10,012</td><td>930</td></tr><tr><td>Total</td><td></td><td>72,434</td><td>6,729</td></tr></table> <p>The Site is well connected, with good access to public transport, which is reflected by its PTAL rating of 4. The buildings on Site are not listed nor is the Site located in close proximity to any listed buildings. A small section of the eastern part of the Site falls within the Culverley Green Conservation Area.</p> <p>Relevant Planning Policy Guidance</p> <p>The Lewisham A21 Development Framework is planning guidance document that was approved by Lewisham on 9 March 2022. Within the framework, the Site is identified as a potential development site within Bellingham Character Area “Site 11 – Ravensbourne Retail Park”. The framework contains two indicative capacity studies for the site, which are summarised below.</p> <p><u>Option A</u> This includes the entirety of the Site and proposed:</p> <ul style="list-style-type: none">• Buildings ranging from 4-10 storeys;• 393 residential units;• 1,500 sqm of non-residential floorspace; and• 220 car parking space in total including 160 off-street spaces and 60 on-street spaces. <p><u>Option B</u> This includes the entirety of the Site and the builders merchants to the immediate south. This option proposed:</p> <ul style="list-style-type: none">• Buildings ranging from 4-12 storeys;• 619 residential units;• 1,500 sqm of non-residential floorspace; and• 290 car parking space in total including 200 off-street spaces and 90 on-street spaces.	Unit		GIA (Sqft)	GIA (Sqrm)	1	Wren Kitchens	14,994	1393	2	B&M Retail Ltd	17,481	1624	3	Tapl	9,937	923	4	Dunelm	20,010	1859	5	The Gym	10,012	930	Total		72,434	6,729		
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							<p>The draft Local Plan Site 22 states that development proposals must be delivered in accordance with the A21 Development Framework. This is discussed in more detail below.</p> <p>The A21 Development Framework indicative capacity studies for the Site are included at Appendix 1.</p>		
CON047	REP236	<p>Montagu Evans</p> <p>OBO</p> <p>Royal London Mutual Insurance Society Limited</p>			3	LCA SA 22	<p>Emerging Allocation - Lewisham Central Area Site Allocation 22: Ravensbourne Retail Park</p> <p><u>Principle of the Allocation</u></p> <p>As explained above, the Site is subject to a draft allocation which these representations broadly support.</p> <p>The allocation promotes the comprehensive, mixed-use development of the retail park comprising residential, main town centre and commercial uses. To support these uses, the allocation includes public realm and environmental enhancements, such as new public open space, landscaping and river restoration. RLMIS is supportive of the draft uses in principle, along with the aforementioned enhancements.</p> <p>RLMIS is keen to ensure that its vision for the redevelopment of the Site is consistent with the objectives of the emerging allocation, as well as the wider borough and the GLA's London Plan. Likewise, RLMIS supports the identification of the potential of the Site to deliver a significant quantum of new jobs and homes whilst having a positive impact on the surrounding area. The allocation currently shows an indicative development capacity as follows:</p> <ul style="list-style-type: none"> • 367 net residential units; • 7,749 sqm of employment floorspace; and • 1,937 sqm of main town centre uses floorspace. <p>Summary</p> <p>These representations are submitted on behalf of RLMIS in respect of Ravensbourne Retail Park.</p> <p>RLMIS believe this site has the potential to deliver a high-quality, residential-led redevelopment and are committed to delivering this in collaboration with the Council. As such, we are writing to support the draft Lewisham Central Area Allocation 20 in principle.</p> <p>However as explained within this letter, we consider that the following amendments are required to the draft site allocation in order to ensure that it is justified, evidence-based and sound:</p>	<p>The Council notes and welcomes Montagu Evan's support for development of the Ravensbourne Retail Park.</p> <p>For clarity, the Council highlights that the Ravensbourne Retail Park (AKA the Bromley Road Retail Park) forms part of larger out of centre retail concentration located on the A21 Growth Corridor to the immediate north of Bellingham Local Centre. The site remains in active use for retail uses and is adjacent to several large employment sites. The site allocation forms a strong commercial frontage to the A21.</p> <p>The site allocation seeks the comprehensive mixed-use redevelopment of existing out-of-centre retail park comprising compatible residential, main town centre and commercial uses. It also seeks to deliver public realm and environmental enhancements including new public open space and river restoration. The Council recognises that existing out of centre retail parks are evolving and that this site has a role to play in the successful place-shaping of the A21 Growth Corridor – not only meeting demand for new homes but also securing the other uses needed to support that growth; including new retail, employment and community uses.</p> <p>For clarity, the respondent has engaged with the plan-making process as part of the previous Regulation 18 consultation and their previous have informed the content of the new Local Plan.</p>	No further action required in relation to the new Local Plan.

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							<ul style="list-style-type: none"> • The indicative town centre use capacity within the draft allocation should be revised to state ‘up to 500 sqm of town centre uses’; • The indicative net residential capacity should be increased from 367 units to 680 units; • The indicative employment capacity of 7,749 sqm should be removed from the draft allocation; and • The draft Site Allocation should be amended to include provision for 200 car parking spaces. <p>By way of this letter, we reserve the right to comment on further rounds of consultation and attend the Examination in Public on behalf of our Client.</p> <p>APPENDIX 1.0 – Extracts from A21 Development Study capacity studies</p> <p>Representation also includes Site Capacity Design Brochure</p>		
CON047	REP237	Montagu Evans OBO Royal London Mutual Insurance Society Limited			3	LCA SA 22	<p>Whilst we are supportive of the emerging allocation and the principle of the uses proposed, the draft allocation proposes a significant quantum of employment floorspace (7,749 sqm). We are of the view that this draft quantum of employment floorspace does not align with national, regional and local objectives. In addition, such provision could undermine the capability of the Site to deliver a residential-led redevelopment and would compete directly with the adjacent Strategic Industrial Land which should be the priority location for new employment uses.</p> <p>We are of the view that the Site should be optimised to provide a greater quantum of both market and affordable residential units. We explain this in greater detail below.</p> <p>RLMIS has commissioned the architects, Patel Taylor, to undertake a massing and capacity study to establish the Site’s residential redevelopment potential. This study demonstrates that the Site can comfortably deliver circa 680 residential units (circa 251 Dwellings Per Hectare), alongside up to approx. 500 sqm of town centre uses at the lower levels. The massing of this scheme has been informed by initial Sunlight/Daylight testing, along with analysis of the surrounding townscape and heritage constraints, neighbouring buildings and an assessment of the public realm and amenity space. Although we have not submitted these detailed studies as part of these representations, the Site Capacity Study prepared by Patel Taylor is included as part of these representations.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 22 Ravensbourne Retail Park.</p> <p>Comments made in relation to the site allocations possible development capacities are noted. Within this context the Council highlights that the new Local Plan must be read and considered in its entirety. The new Local Plan site allocations identify indicative development capacities – the emphasis being upon the word “indicative”. The capacity figures identified within the new Local Plan are very much a starting point on a journey to identifying and securing optimal development capacities.</p> <p>In turn, the development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an</p>	<p>Although Officers are not proposing that any modifications be made in respect of the site allocation specific development capacities, the Council could consider undertaking a separate exercise to identify and assess the possible uplift that higher intensity development could offer. This could inform a parallel decision/discussion on whether the Council’s proposed 5% buffer is sufficient to secure a sound new Local Plan. The possible assessment of site uplift should seek to identify a RAG rate for each site’s capacity to accommodate higher density and potentially taller development. The Council could seek to deploy this, if necessary, either in response to Inspector’s MIQs or at the hearing sessions.</p>

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							However, we will submit the detailed supporting information to Lewisham Planning Department shortly in or to arrange a pre-application meeting to continue our discussions on the proposals.	<p>opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>The Council concludes that the new Local Plan's master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p> <p>The Council notes and welcomes new technical work that may have been undertaken to support the progressive redevelopment of the site. In that respect the Council encourages development partners to constructively engage with the decision-taking process – as outlined above. This provides an opportunity for such evidence to inform the master planning and design-led approaches that will bring forward growth across the Borough.</p> <p>The comments made in relation to the quantum of mixed uses are noted. The Council maintains that the mix of uses being delivered through this site allocation is necessary to secure successful and balanced place-making within the context of the spatial strategy. It is highted that the respondent has not presented any evidence to demonstrate an alternative narrative – where a substantially reduced quantum of non-residential uses achieves the same objective.</p>	
CON047	REP236	Montagu Evans OBO Royal London Mutual			3	LCA SA 22	<p><u>Town Centre Uses / Floorspace</u></p> <p>We are supportive of the inclusion of town centres uses Within the draft allocation however as the Site is not located in a Town Centre, the indicative quantum of retail floorspace of 1.,937 sqm should be reduced. The objective of the draft Local Plan, consistent with the NPPF and the London Plan, should be to maintain the vitality and viability of town centres by concentrating new town centres uses/floorspace to these</p>	<p>The comments made in relation the policy's objective for securing the comprehensive redevelopment of the site to be comprised of compatible residential, main town centre and commercial uses are noted.</p>	No further action required in relation to the new Local Plan.

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		Insurance Society Limited					<p>locations to ensure out-of-centre development is not detrimental to the growth and function of town centres.</p> <p>As such, rationalising the retail offer on the Site from the existing situation will support the long-term vitality and viability of Catford as a major town centre. An assessment of the local demand for retail floorspace has been undertaken by a specialist retail agency consultant and this supports a conclusion that up to 500 sqm of town centre uses would be the viable quantum of floorspace in this location.</p> <p>In summary, we are supportive of the inclusion of town centre uses within the draft allocation however this should be reduced to 500 sqm as we feel this is more appropriate and would not undermine the viability of Catford Town Centre and would complement and support the wider residential-led redevelopment of the Site.</p>	<p>The respondent's comment that the site allocation is not within an identified town or retail centre is noted. As is the suggestion that redevelopment substantially reduce the available on-site retail offer. The Council consider that this would be contrary to the wider spatial strategy that identifies the A21 as a Growth Corridor.</p> <p>The respondent is correct that retailing is changing – indeed, as a use it has always been subject to visible evolution. This is nothing new. As housing delivery across the Borough's identified growth areas (including the A21 Corridor) increases over the plan-period, it is vital that other key uses, including retail and employment, are integrated within a genuinely mixed-use palette. Whilst national trends, over the past twenty years, have hinted to the death of retail, the future, particularly in intensely developed metropolitan areas (such as Lewisham) suggests otherwise. In that respect it remains important that sufficient provision is made across the Borough – particularly at Growth Nodes, Areas, and Corridors to secure successful place-making. The Council maintains that this is a sound approach.</p> <p>It is noted that the respondent raised this issue during the Regulation 18 Consultation. After careful consideration the Council reviewed the quantum of retail provision sought through this site allocation – in accordance with the respondent's request. It is unclear as to why they are now seeking further reductions in the scale of mixed-uses proposed for this site allocation. The Council considers this to be unsound place-making.</p> <p>Finally, for clarity it is noted that the site allocation speaks to a mix of non-residential floorspace comprised of employment and main-town centre uses –</p>	

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								not exclusively retail. The Council highlights this fact as it provides those promoting development and decision-takers with flexibility to consider other appropriate town centre uses in addition to retail.	
CON047	REP239	Montagu Evans OBO Royal London Mutual Insurance Society Limited			3	LCA SA 22	<p><u>Employment Uses / Floorspace</u></p> <p>As stated above, Site Allocation 22 identifies the Site as having an indicative development capacity to provide 7,749 sqm of employment floorspace / uses. We are not supportive of this draft allocation requirement for the reasons explained in more detail below.</p> <p>Firstly, the economic market conditions have shifted significantly over the past 12 months in relation to delivering industrial and employment industrial uses on the Site. As a result of this, a residential-led redevelopment is the most viable and deliverable scheme that can come forward. We have also listened to the pre-application feedback received from the Council and the massing and capacity study prepared by Patel Taylor and submitted as part of these representations responds to the feedback received and current market conditions. In addition, draft Local Plan Policy EC2 (Protecting employment land and delivering new workspace) states that there is a forecast need for 21,800 sqm of net additional employment floorspace in the Borough up to 2038. Draft Policy EC2 states that new employment floorspace in the Borough should be delivered in accordance with the Lewisham Employment Land hierarchy, therefore industrial uses should be intensified within Strategic Industrial Land ('SIL') and Locally Significant Industrial Sites ('LSIS') and new commercial workspace maximised within Mixed-use Employment Locations ('MEL'). Successful delivery of the spatial strategy for the Borough is dependent on new employment development being directed to these locations, along with town centres.</p> <p>Draft Local Plan EC7 (Mixed-use Employment Locations) states that comprehensive redevelopment of Mixed-use Employment Locations will be supported to facilitate their renewal and regeneration for commercial uses, prioritising new offices and light industrial space. There are eight designated MELs in the draft Local Plan: • Arklow Road; • Childers St Estate; • Convoys Wharf; • Grinstead Road; • Oxestalls Road; • Plough Way; • Sun and Kent Wharf; and • Surrey Canal Triangle</p> <p>While the Site is not located within a SIL, an LSIS, a MEL or a Town Centre, the draft Site Allocation has an indicative employment capacity of 7,749 sqm, which effectively equates</p>	<p>Comments made in relation to the site allocations possible development capacities are noted. Within this context the Council highlights that the new Local Plan must be read and considered in its entirety.</p> <p>The historic shift in market conditions is noted. This is frequently cited position, which unfortunately does not take account of the fact that the new Local Plan is aspirational (and achievable) and covers a longer forward-looking timeframe. Furthermore, it is highlighted that successful plan-making and place-shaping is not simply about allowing the delivery of most viable scheme possible.</p> <p>For clarity (as stated above), the current active uses across the site are all in commercial retail employment use. As the site evolves and new employment uses are brought forward it is entirely conceivable that a future version of the Local Plan identify the site as a Mixed-Use Employment Location. The dominant retail uses present across the entirety of the site serve to prevent this being the case now. Nevertheless, the delivery of the site allocation would allow for that evolution over time. This serves as an example of place-making.</p> <p>For clarity, it is noted that the respondent raised this issue during the Regulation 18 Consultation. After careful consideration the Council reviewed the quantum of employment provision sought through this site allocation – in accordance with the respondent's request. It is unclear as to why they are now seeking further reductions in the scale of mixed-uses</p>	

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							<p>to a third of the identified 21,800 sqm of net additional employment floorspace required. To successfully support the delivery of the spatial strategy and good growth within the Borough, we consider that the Site should not be required to provide any employment floorspace to ensure that new employment and industrial floorspace is concentrated toward designated employment locations. The provision of such a significant quantum of employment floorspace on the Site as part of any redevelopment would only serve to undermine the delivery and concentration of such uses within Borough employment areas, contrary to the strategic economic objectives of the NPPF, London Plan and the draft Local Plan employment policies.</p> <p>In summary, as there is no evidence within the draft Local Plan evidence base to demonstrate a need for 7,749 sqm of employment floorspace from the Site and it is unjustified, we consider that this should be removed from the draft allocation to ensure the soundness of the Local Plan.</p>	proposed for this site allocation. The Council considers this to be unsound place-making.	
CON047	REP240	Montagu Evans OBO Royal London Mutual Insurance Society Limited			3	LCA SA 22	<p><u>Residential Development</u></p> <p>As outlined above, we support the principle of residential development which has been included in the draft allocation for the Site. However, the Site should be further optimised to boost the supply of new homes consistent with the National Planning Policy Framework ('NPPF'), specifically the requirement for "...strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land" set out at Paragraph 119.</p> <p>The Site is an exceptional residential location. It has excellent transport connectivity, local amenities and lack of competing development. Bellingham station is just a 6-minute walk from the site, with direct services to Central London in less than 30 minutes making it ideal for local working families.</p> <p>Numerous public parks, schools and facilities are located nearby and the site already boasts an attractive green area separating the site from Bromley Road. The Ravensbourne River flows directly west of the site and residential redevelopment offers the opportunity to enhance the site's relationship to the river creating a valuable amenity for local residents. The surroundings are primarily residential and would make an ideal neighbourhood for a flourishing new community. New residents would also benefit from their proximity to the amenities of Catford town centre.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 22 Ravensbourne Retail Park – specifically in relation to the indicative residential development capacity of the site, and housing land supply in general.</p> <p>The Council highlights that the new Local Plan must be read and considered in its entirety. The new Local Plan site allocations identify indicative development capacities – the emphasis being upon the word "indicative". The capacity figures identified within the new Local Plan are very much a starting point on a journey to identifying and securing optimal development capacities.</p> <p>In turn, the development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a sound approach for decision-taking. They</p>	Although Officers are not proposing that any modifications be made in respect of the site allocation specific development capacities, the Council could consider undertaking a separate exercise to identify and assess the possible uplift that higher intensity development could offer. This could inform a parallel decision/discussion on whether the Council's proposed 5% buffer is sufficient to secure a sound new Local Plan. The possible assessment of site uplift should seek to identify a RAG rate for each site's capacity to accommodate higher density and potentially taller development. The Council could seek to deploy this, if necessary, either in response to Inspector's MIQs or at the hearing sessions.

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							<p>The scale of the site presents a compelling opportunity to deliver the first major scheme in Catford since the redevelopment of the former Greyhound Stadium.</p> <p>Looking explicitly at housing delivery in the Borough, the most recently published Annual Monitoring Report ('AMR') 2021-2022 (December 2022) states that whilst Lewisham is currently able to demonstrate a Five Year Housing Land Supply (for the period 2022-23 to 2026-27) of 5.03 years (with a 5%) buffer, Lewisham acknowledge within the AMR that they will need to start planning for a 20% buffer in the near future due to the increasing challenge of meeting the identified housing delivery need. When a 20% buffer is applied, Lewisham can demonstrate 4.52 deliverable years.</p> <p>Lewisham also acknowledge within the AMR that the sites anticipated to come forward for development in years 11-15 will not meet the housing requirement towards the latter end of the Local Plan period and that this situation will worsen if Lewisham does not start planning for a 20% buffer.</p> <p>It is therefore evident that there is increasing pressure on Lewisham to deliver additional housing over the draft Local Plan period, especially in the context of the likelihood of applying a 20% buffer to the housing land supply.</p> <p>Therefore, sustainable, previously developed sites should be maximised in order to meet the increased housing pressures in the borough and across London, consistent with the NPPF. This is outlined in London Plan Policy GG2 (Making the Best Use of Land) which promotes higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. This site meets all of these criteria.</p> <p>Overall, we consider that there is a clear need for the draft allocation to further optimise the Site to maximise the quantum of market and affordable residential units that can be delivered, which in turn would help meet growing housing pressures. The massing and capacity study prepared by Patel Taylor and submitted as part of these representations demonstrates that circa 680 units can be comfortably delivered on the Site within an acceptable layout and massing.</p> <p>Therefore, draft Site Allocation 22 should be amended to increase the indicative net residential capacity to 680 units.</p>	<p>provide development partners with an opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>The Council concludes that the new Local Plan's master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p> <p>For clarity, the Council highlights that the new Local Plan is seeking to exceed the housing needs (starting position) identified through the London Plan.</p> <p>For clarity, the new Local Plan identifies a spatial strategy for the Borough under Policy OL 1 Delivering an Open Lewisham (spatial strategy). This directs growth and infrastructure investment to the most suitable and sustainable locations across the Borough. This approach is supported by the general planning policies and site allocations.</p> <p>In addition, the new Local Plan has a sound approach towards the delivery of small site opportunities. This is primarily set out under new Local Plan Policy HO 2 Delivering an Open Lewisham (spatial strategy), but also supported through Policy HO 9 Self-build and custom-build housing.</p> <p>The new Local Plan's approach towards optimising the development capacity of sites is clearly set out under Policy QD 6 Optimising Site Capacity. The Council maintains that this is a sound approach towards securing quality design and successful place-making. In contrast, the respondent's suggestion that previously</p>	

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								<p>developed sites be maximised for the residential development potential is fundamentally unsound – beyond delivering housing numbers there is no evidence offered that this would secure successful and quality places. It is a fundamentally an unsustainable concept.</p> <p>The comments made in relation to the possible future housing land trajectory are noted. It is highlighted that currently Lewisham is meeting the requirements of the Housing Delivery Test and is not facing any of its punitive measures. Nevertheless, the Council is seeking to introduce measure that will seek to provide greater certainty of delivery going forward – to maintain a steady housing land supply.</p> <p>It is further noted that although the Test focusses upon and penalises the local planning authority – in most respects the factors governing delivery are in fact beyond their control. Mooted changes to national planning policy may address this fact. The Council welcomes the introduction of measures that would hold development partners to full account for their performance.</p> <p>Finally, the suggested increase in the % Buffer (as set out under NPPF Para 74) is noted. The Council considers the proposed increase to 20% - as per NPPF Para 74 C – to be excessive, unnecessary, and unjustified.</p> <p>It is an established fact that for such % increases in the buffer to be meaningful in performance improvement, contributing sites and their developers need to be shovel ready; to have an immediate impact. It is telling that this representation does not set out a clear narrative of how an increased quantum of housing, on site, could be delivered in a timely fashion.</p>	

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CON047	REP241	Montagu Evans OBO Royal London Mutual Insurance Society Limited			3	LCA SA 22	<u>Car Parking</u> Consistent with the A21 Development Framework, any redevelopment of the Site should include on-site car parking provision for both the residential and non-residential uses. As such, we consider that the draft Site Allocation should be amended to include provision for up to 200 car parking spaces, which is broadly reflective of the quantum included within the A21 Framework development options.	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 22 Ravensbourne Retail Park – specifically in respect of the need and possible scale of vehicle parking provision in the future.</p> <p>The Council acknowledges that development proposals for the allocation will need to consider and respond to the on-site needs of future residents, shoppers and others visiting/ using the site. This includes the provision of vehicle parking.</p> <p>Upon further consideration, the Council does not consider this to be a matter of soundness for the plan or this policy. The new Local Plan must be considered and read as a whole. The new Local Plan Policy TR 4 Parking sets out how decision-takers will consider this matter. The Council concludes that this is sound mechanism for managing this matter.</p>	No further action necessary in relation to the new Local Plan.
CON047	REP242	Montagu Evans OBO Royal London Mutual Insurance Society Limited			3	LCA SA 22	<u>Building Heights</u> We support the inclusion of the Site within a ‘Tall Building Suitability Zone’ within the draft Local Plan and support building heights of 10-12 storeys on the Site as appropriate.	<p>The Council notes and welcomes Montagu Evans’ support in relation to tall buildings being suitable in Lewisham’s Central Area Site Allocation 22 Ravensbourne Retail Park.</p>	No further action required in relation to the new Local Plan.
CON048	REP243	DP9 OBO HPG			3	LNA SA 01	<p>On behalf of our client, Hutchison (‘HPG’), please see our below response to the Lewisham Local Plan Regulation 19 consultation document.</p> <p>By way of background, HPG has long term ownership of Convoys Wharf (the ‘Site’) and intends to develop the land in the short to medium term.</p> <p>The Site benefits from existing outline planning permission (ref. DC/13/083358) approved in March 2015 for the following description of development “Demolition of all non-listed structures at the site, and comprehensive redevelopment (to include retention and refurbishment of the Grade II Listed Olympia Building) to provide up to 419,100 m2 of mixed use</p>	<p>The Council notes DP9’s introductory comments including site context and details of the planning consent in relation to Lewisham’s North Area Site Allocation 1 Convoys Wharf.</p>	No further action required in relation to the new Local Plan.

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							<p>development comprising up to: 321,000 m2 residential (Class C3) (up to 3,500 units); 15,500 m2 business space (Class B1/live/work units) and to include up to 2,200 m2 for up to three energy centres; 32,200 m2 working wharf and vessel moorings (Class B2 and sui generis); 27,070 m2 hotel (Class C1); 5,810 m2 retail, financial and professional services (Classes A1 and A2); 4,520 m2 restaurant/cafes and drinking establishments (Classes A3 and A4); and, 13,000 m2 community/non-residential institutions (Class D1 and D2), 1,840 car parking spaces, together with vehicular access and a river bus facility.” This is known as the ‘Consented scheme’.</p> <p>The Consented scheme has been implemented and a number of the plots have come forward through Reserved Matters submissions. Works have commenced on Site at Plot 08, with P22 coming forward in the short term.</p> <p>The Site is of strategic importance, and of London-wide significance. The Site is located within existing Strategic Site Allocation 2, allocated for mixed use development. The consented scheme is considered to meet the objectives of the adopted site allocation.</p>		
CON048	REP244 a and b	DP9 OBO HPG			2 3	OL 01 LNA SA 01	<p><u>Review of Policy Topics</u> HPG support the aspirations of draft Policy OL1: Delivering an Open Lewisham (spatial strategy), which sets out that good growth will be delivered by directing new development to Growth Nodes, Regeneration Nodes and well-connected sites, including in Lewisham’s Opportunity Areas and carefully managing growth in these locations in response to local character.</p> <p>The policy also confirms that good growth will be delivered by making the best use of land and space by prioritising the redevelopment of brownfield land of low or negligible ecological value. Convoys Wharf is a brownfield site, located within the Deptford Creek/Greenwich Riverside Opportunity Area and within a Regeneration Node, and therefore will contribute to the Borough’s aspirations of securing good growth.</p>	The Council notes and welcomes DP9’s support in relation to the new Local Plan Policy OL1 Delivering an Open Lewisham.	No further action required in relation to the new Local Plan.
CON048	REP245 a and b	DP9 OBO HPG			2 3	TR 04 LNA SA 01	<p><u>Car Parking</u> The Site allocation confirms that the Site has a low PTAL rating of between 0-2, where 0 is the worst and 6b is the best.</p> <p>Draft Policy TR4 acknowledges that “development proposals for car-free development will be supported where they are located in highly accessible and well-connected locations. Elsewhere, car-free development will be supported where it can be suitably demonstrated that:</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy TR 04 Parking.</p> <p>The development partners desire to ensure accessibility to the Convoys’ Wharf site allocation is noted. However, the focus upon securing excessive on-site car parking provision is short-sighted.</p>	No further action required in relation to the new Local Plan.

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							<p>a. The development is appropriately located at a well-connected location with good walking and cycling access to local amenities and services; or</p> <p>b. The development is appropriately located within an Opportunity Area, Growth Node, Regeneration Node, Growth Corridor or town centre where the Local Plan makes provision for significant public realm enhancements that will bring about attractive conditions for walking and cycling and improve access to local amenities and services; and</p> <p>c. There is an existing Controlled Parking Zone (CPZ), or a future CPZ can be established through planning contributions;</p> <p>d. There is sufficient capacity on the public transport network or potential for active travel interventions or implementation of Low Traffic Neighbourhoods in the local area to cater to the additional demand arising from the development, taking into account existing and planned transport infrastructure;”</p> <p>The Site is not currently in a well-connected location, and the PTAL of the Site is not expected to improve significantly by 2031 which highlights the need for car parking. It is acknowledged that new proposed bus routes and the introduction of transportation from the Thames will go some way to improve the accessibility of the Site, however this will not resolve the ongoing demand in the area for car parking. Therefore the site allocation should recognise the need for some level of car parking within the development to avoid pressure on on-street parking, or ‘car-lite’ in line with London Plan Policy T6. The consented scheme allows for the provision of 1,840 car parking spaces which is equivalent to 0.44 bays per unit which is considered appropriate in line with the current PTAL. It is therefore considered that the need for ‘car-lite’ schemes should be acknowledged within Policy TR4.</p>	<p>The Council acknowledges the expressed concerns relating to parking provision for privately owned motor vehicles. The new Local Plan is actively seeking to encourage sustainable growth of our Borough’s places. That growth is being supported with investment into strategic and local sustainable travel networks, which will provide residents and communities with viable transport alternatives. The Council considers that during the lifespan of the new Local Plan, residents will be able to make the choice of either using sustainable travel modes or continuing with car ownership. Evidence demonstrates that societal changes in travel mode do have a profound on place. For these reasons contrary to the stated comments, the Council considers it entirely reasonable that during the plan period demand for private car parking provision will reduce. Advances in vehicle ownership models and technology (particularly AI) could further influence this trend.</p>	
CON048	REP246	DP9 OBO HPG			2	EC 7	<p><u>Mixed Use Employment Locations</u></p> <p>Convoys Wharf is identified as a ‘Mixed-use Employment Location’ (MEL) which is governed by draft Policy EC7. Part C of the policy confirms that where the comprehensive redevelopment of an MEL has been delivered through the Masterplan process all future proposals involving the redevelopment or change of use of land should retain and whenever possible seek to increase the proportion of industrial capacity across the MEL, as originally approved in the masterplan and planning consent. The policy also sets out that proposals should also ensure there is no net loss of industrial capacity. Whilst the need to retain capacity is understood, it is considered that exceptions should be made where there are no longer demand for continued industrial floorspace in mixed-use employment locations.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 7 Mixed-use Employment Locations (MEL).</p> <p>For clarity, it is highlighted that the Convoys’ Wharf site was historically entirely in employment use, the majority of which could be classified as industrial. Its subsequent redevelopment as a mixed-use employment location has resulted in a loss of employment floorspace. That is a fact.</p> <p>Although the Council recognises that the Borough’s economic profile is changing, the demand for industrial employment</p>	No further action required in relation to the new Local Plan.

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								<p>floorspace remains. Within this context it is noted that the Greater London Authority are now referring to recently published data which suggests that demand for industrial floorspace continues to be high and may in the future exceed supply.</p> <p>Furthermore, the decision-taking process continues to provide development partners with the opportunity to demonstrate innovative and alternative approaches to meeting employment floorspace needs. The Council suggests that this provides an appropriate and effective mechanism for responding to changing employment demand, and concurrently securing the optimal use of development sites. The Council concludes that this approach is sound.</p>	
CON048	REP247	DP9 OBO HPG			3	LNA SA 01	<p><u>Site Allocation 1: Convoys Wharf Mixed-Use Employment Location</u></p> <p>HPG support the aspiration set out in the draft Local Plan that comprehensive redevelopment of the site is integral to supporting regeneration in the Deptford area.</p> <p>The proposed Site Allocation identifies an indicative development capacity for 3,500 net residential units. This reflects the approved position under the consented scheme. However, it is considered and has been agreed in pre-application discussions with both the GLA and the London Borough of Lewisham, that the Site can accommodate additional units. A drop-in application to extend the consented Masterplan is planned in the short term which will seek to accommodate c.600 additional units above the approved 3,500 units. Therefore, in order for the policy to be positively prepared, where opportunities are identified, the ability for further residential units to come forward should additionally be identified.</p> <p>It is suggested that explanatory paragraph 15.24 is amended as follows: 'Convoys Wharf is a large brownfield site covering an area of more than 16 hectares, which is strategically located along the River Thames. In the 16th Century it was the Site of the Royal Naval Dockyard. The Site has been vacant for many years having last been used for industrial activities. Comprehensive redevelopment of the Site is integral to supporting regeneration in the Deptford area, with the creation of a new</p>	<p>The Council notes and welcomes the broad level of support offered in relation to the new Local Plan Policy LNA SA 01 Convoys' Wharf Mixed-Use Employment Location.</p> <p>The comments made in relation to the possibility of the site allocation accommodating an additional 600 residential units is noted.</p> <p>For clarity, it is highlighted that the Convoys' Wharf site was historically entirely in employment use, the majority of which could be classified as industrial. Its subsequent redevelopment as a mixed-use employment location has resulted in a loss of employment floorspace. That is a fact. The policy objective for the site allocation continues to be securing a comprehensive mixed-use redevelopment with compatible residential, commercial, community, and main town centre uses – in accordance with new Local Plan Policy EC 7. Critically, that includes the retention, and wherever possible, the increase in the proportion of industrial capacity across the identified MEL. Additional housing provision, where it is possible must not be at the expense of this objective.</p>	No further action required in relation to the new Local Plan.

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							high quality mixed-use quarter that responds positively to its historical context. With the site's prominent riverside location, and proximity to Deptford High Street, there is significant scope for transformational public realm and environmental enhancements. These will support the delivery of a new residential area and visitor destination that is well-integrated with its surrounding neighbourhoods and communities. There are further opportunities to increase the provision of residential units within the Site and to re-activate the safeguarded wharf that comprises part of the site, including for river based passenger transport.'	Nevertheless, the Council highlights that the new Local Plan's site allocations identify indicative development capacities, which are further considered in accordance with Policy QD 6. The latter seeks the deployment of master planning and/ or design-led approaches to secure the best use of sites, and at the same time deliver high quality design. For this reason, the Council consider it unnecessary to amend the policy now. There is sufficient flexibility within the decision-taking process for development partners to propose and justify alternative optimal developments. The Council considers this approach sound.	
CON048	REP248	DP9 OBO HPG			3	LNA SA 01	<u>Conclusion</u> Our client, HPG, have been long term owners of the site and are committed to delivering high-quality development on the site. To enable this, HPG are keen to engage fully in the stages of adopting the new local plan and are keen to continue liaising with LBL to bring forward the Masterplan scheme and future proposals for the Site. We trust that the enclosed information clearly highlights both the history and the opportunities for development present on the site	The Council notes DP9's conclusion. The Council's response to the matters raised can be found above.	No further action required in relation to the new Local Plan.
CON048	REP249	DP9 OBO Fosfel Apollo Limited			3	LNA SA 06	INTRODUCTION AND BACKGROUND On behalf of our client, Fosfel Apollo Limited (hereafter referred to as 'Fosfel Apollo' or the 'Client'), we write in response to the London Borough of Lewisham Local Plan Regulation 19 Consultation, which is open for comment between 1 March 2023 and 25 April 2023. Hurlington welcomes the opportunity to engage in this consultation that shall feed into the next stage of the Draft Local Plan review. This letter sets out Fosfel Apollo's comments to the Regulation 19 Consultation. Due consideration has also been given to recent discussions with Planning Officers at the London Borough of Lewisham ('LBL') during pre-application discussions for the proposed redevelopment of the Apollo Business Centre, Trundley's Road, New Cross, SE8 5JE (hereafter referred to as the 'Site' or the 'Apollo Business Centre'). In February 2023, on behalf of our Client, DP9 submitted a full planning application at the Apollo Business Centre, for the following development (ref. DC/23/130258): "Mixed-use redevelopment of the site for a new building comprising part	The Council notes and welcomes the in principal support for the new Local Plan Policy LNA SA 06 Apollo Business Centre Locally Significant Industrial Site. For clarity, the new Local Plan identifies indicative development capacities for all its site allocations. These indicative capacities have been identified through a desk top methodology. These are intended to provide a conservative estimate of capacity that can then inform discussion and negotiation to secure optimal development capacity/ yields through the decision-taking process. The Council notes the comments made in relation to the indicative capacities identified in the new Local Plan Site Allocations. The suggestion that the	No further action required in relation to the new Local Plan.

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							<p>10, part 26 storeys, including purpose built student accommodation and associated amenity space (Sui Generis), affordable residential (use class C3), light industrial use at ground and first floor levels (use class E(g)), retail / community use (use class E(a) / F1 / F2) at ground floor level, hard and soft landscaping, together with ancillary plant and servicing; and associated enabling works". The following representations are made in light of the above live planning application at the Site, balancing both our Client's interests and LBL's aspirations for its redevelopment. Reference is made to the emerging proposals at the Site where relevant.</p> <p>2. SITE ALLOCATION 6 - APOLLO BUSINESS CENTRE The Site is allocated within the Draft Local Plan under Site Allocation 6 ('Apollo Business Centre Locally Significant Industrial Site'). The redline boundary for Site Allocation 6 captures land under different ownership, including parcels of land that are both privately and publicly owned.</p> <p>The Site is allocated for the following: "Comprehensive employment-led redevelopment on this re-designated Locally Significant Industrial Site (LSIS)". The allocation identifies an indicative development capacity of 98 residential units and 3,396 sqm gross employment floorspace. The timeframe for delivery is estimated between 2028 – 2032. A copy of the site allocation can be found at Appendix A.</p> <p>As part of the Draft Local Plan, LBL recognise that "redevelopment and site intensification, along with the co-location of commercial and other uses, will deliver high quality workspace that forms part of a new employment-led mixed-use quarter, together with Trundley's Road SIL and Neptune Wharf MEL sites". LBL's development requirements are provided at Paragraph 15.51, including (but not limited to):</p> <ul style="list-style-type: none"> • Development must be delivered in accordance with a masterplan to ensure coordination in the co-location phasing and balance of uses across the site; and • Development must not result in the net loss of industrial capacity, or compromise the function of the LSIS. <p>The draft site allocation provides a clear indication of LBL's vision and aspirations for the Site. It is considered that this is fully aligned with the development proposals for the redevelopment of the Apollo Business Centre, which is currently pending determination.</p>	<p>Council revisits the approach to indicative capacities is unnecessary. The new Local Plan's policy approach to this matter, set out under Policy QD 6 Optimising Site Capacity providers development industry partners, and decision-takers with a flexible approach to this matter. This provides the opportunity for development proposals to demonstrate the optimal capacity of sites by presenting evidence to the decision-taking process. The Council considers this approach sound.</p> <p>Finally, the Council notes the comments relating to the existing uses located across the site.</p>	

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							<p>Our Client is therefore supportive of the proposed site allocation and LBL's aspirations for the redevelopment of the Site.</p> <p>Whilst our Client welcomes the allocation of the Site and its release from Strategic Industrial Land (SIL) and redesignation as a LSIS, it is noted that the revised indicative development capacity for the Site is not based on evidence and matters of fact, nor does it reflect its constraints and the existing floorspace on-site. The Regulation 18 Draft Local Plan provided an indicative capacity of 59 net new residential units and 2,037 sqm employment floorspace, compared to the Regulation 19 Draft Local Plan which suggests capacity for 98 units and 3,396 sqm employment floorspace. From review of the Evidence Base submitted with the Regulation 19 Local Plan, the Integrated Impact Assessment (dated November 2022) does not appear to have appropriately assessed the Site. Paragraph 5.4.25 of the report states "three sites are now at the pre-application stage and supported for notably different densities than anticipated within the Draft Plan, which serves to illustrate the challenge of making accurate assumptions in respect of development density at the Local Plan Stage". The report also notes at Paragraph 9.9.8 that the latest proposal, compared to the Draft Plan, involves 66% more housing and 66% more employment. However, there is no methodology or evidence base for the percentages being stated, which demonstrates that the capacity of the Site is not based on robust evidence.</p> <p>In light of the increased floorspace areas proposed as part of the Regulation 19 Draft Local Plan, Fosfel Apollo would strongly recommend that the Evidence Base is rigorously reviewed to accurately assess and determine the Site's development potential and provide robust evidence and justification for the increase in capacity. A rigorous methodology should be applied to ensure that the indicative development capacity is accurate, to provide a strong foundation and basis for future development proposals. The assessment should take into account the ability to deliver increased residential and commercial floorspace on-site, particularly in the context of the Site's irregular shape and access constraints, as well as restrictions based on land ownership.</p> <p>Separate to the above, Paragraph 15.51 at Part 3 notes that there is an existing waste use at the Site (Southwark Metals). Development proposals are therefore required to address this use in accordance with Local Plan Policy SD12 and London Plan</p>		

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							<p>Policy SI9. The Site is currently occupied by Southwark Metals on a temporary basis, following their relocation from the Ruby Triangle (Old Kent Road), whilst they await their new permanent site in Thamesmead. The waste site is not a permitted use in planning terms, which is corroborated by the Greater London Authority's ('GLA') London Waste Map. Furthermore, Southwark Metals do not have a waste permit from the Environment Agency, and instead, is operating under an exemption. Following a pre-application meeting with the GLA, Officers confirmed that they were satisfied that the current waste processing use at the Site is temporary and is not required to meet the Borough's waste processing capacity requirements. On this basis, the Apollo Business Centre does not qualify as a waste site in London Plan terms, requiring protection or compensatory provision as part of the Site's redevelopment. In light of the above, our Client requests that reference to an existing waste use is removed from Site Allocation 6 at Paragraph 15.51, Part 3, as there is no requirement to assess the proposals against the Draft Local Plan Policy SD12 and London Plan Policy SI9. The Site's existing permitted use is industrial use.</p> <p>SOUNDNESS OF THE DRAFT LOCAL PLAN The London Borough of Lewisham, through the current consultation, has posed questions on the soundness of the Draft Local Plan. Fosfel Apollo considers that the Draft Local Plan is positively prepared and contains a clear and objectively assessed need for homes and employment floorspace, which the plan intends to deliver in a sustainable way. However, as identified above, our Client has concerns that, as currently proposed, the Draft Local Plan is not fully effective in respect of Site Allocation 6, given that the indicative development capacity has not been robustly justified, directly informed by the Evidence Base. Secondly, the draft affordable workspace Policy EC4 is not fully aligned with London Plan Policy E3. This should be reviewed and amended to ensure consistency across the Development Plan. The Draft Local Plan is currently inconsistent with the adopted London Plan in this respect and there are compelling reasons for revisions to Policy EC4 within the Draft Local Plan.</p> <p>CONCLUSION AND NEXT STEPS Fosfel Apollo welcomes the opportunity to comment on the London Borough of Lewisham's Draft Local Plan.</p>		
CON048	REP250	DP9 OBO			2	QD4	<p>POLICY QD4 BUILDING HEIGHTS</p> <p>Fosfel Apollo supports the inclusion of a prescriptive policy which dictates a range of acceptable building heights and locations where tall buildings are deemed suitable.</p>	The Council notes and welcomes the support offered in relation to the new Local Plan Policy QD 4 Building Heights.	No further action required in relation to the new Local Plan.

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		Fosfel Apollo Limited					<p>Draft Local Plan Policy QD4 defines tall buildings as those which are substantially taller than their surroundings and cause a significant change to the skyline. Within Lewisham, tall buildings are 10 storeys (or 32.8 metres measured from ground to the top of the building) or greater. Within locations identified as appropriate for tall buildings, the maximum height of the buildings should not normally be more than 96.8 metres (30 storeys) to 144.8 metres (45 storeys) in Deptford/ North Deptford. As part of the Draft Local Plan, the Site is identified as an 'Appropriate Location for a Tall Building' and is located in the Deptford / North Deptford area, in which maximum building heights are identified.</p> <p>Our Client is supportive of the proposed tall building allocation and the prescribed maximum building heights. The emerging scheme on-site has been developed in line with this emerging policy and it has been ensured the proposals on-site sit within the maximum heights stated. Our Client also agrees with the inclusion of a Tall Building Suitability Zone (see Appendix B), where tall buildings will only be permitted in identified locations within the plan. This ensures a coordinated approach which is both plan-led and design-led, to ensure appropriate densities across the Borough and maximise development opportunities to ensure that LBL's aspirations are fully realised and appropriate sites are optimised in line with London Plan Policy D3 and Policy D4. The surrounding area is undergoing significant regeneration. Currently, there is a prominence of heights around Deptford Park and Folkestone Gardens.</p> <p>The emerging policy will ensure that tall buildings are brought forward in suitable locations and will secure exemplary design quality and safeguard the surrounding environment. On this basis, Fosfel Apollo does not propose any amendments to the current wording of Policy QD4 and is fully supportive of the current drafting.</p>		
CON048	REP251	DP9 OBO Fosfel Apollo Limited				HO7	<p>POLICY HO7 PURPOSE BUILT STUDENT ACCOMMODATION</p> <p>The Draft Local Plan supports proposals for purpose-built student accommodation (PBSA) where it can be demonstrated that there is an identified need and the delivery of conventional housing will not be compromised. Policy notes it will also take into account the amount of PBSA within the Borough and the proportion of PBSA provided in relation to the overall mix of housing within a development.</p> <p>Our Client welcomes this approach, particularly given the demonstrable future demand and need for PBSA within the Borough at present. The supporting text, at Paragraph 7.57, states that "some 1,686 units were delivered and consented</p>	<p>The Council notes and welcomes the broad level of support offered in relation to the new Local Plan Policy HO 7 Purpose built student accommodation.</p> <p>The comments made in relation to the policy's requirements, specifically in relation to securing agreements with one or more specific higher education provider(s), is noted. For clarity, evidence demonstrates that in Lewisham the overwhelming demand is for new genuinely affordable homes and market</p>	No further action required in relation to the new Local Plan.

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							<p>from 2016 to 2021, or an average of 337 per year...The London Plan sets out an overall target for London of 3,500 PBSA units per annum across all boroughs. In this context, Lewisham is making a significant contribution to meeting London's needs for PBSA. A carefully managed approach to additional capacity is therefore required. Development proposals must clearly demonstrate that the provision will not lead to a harmful overconcentration of PBSA".</p> <p>The figures referred to above are sourced from Lewisham Strategic Housing Market Assessment (SHMA) 2022. Whilst the SHMA refers to the amount of PBSA that has come forward in the Borough over the last 5 years, there is no assessment or consideration of existing or future PBSA need within the Borough. In terms of future student need requirements, the SHMA appears to rely on the London Plan annual PBSA target. It is important to recognise that the London Plan target is not set by Borough, as the location of PBSA should be based on student need requirements, whom are increasingly locating in inner London Boroughs and commuting to Institutions.</p> <p>A PBSA Demand Study, prepared by Savills, was submitted as part of the live planning application at the Site. The report states that there are currently 2,846 operational student beds in Lewisham and over 7,500 students, resulting in a bedroom to student ratio of 2:7. This is higher than surrounding Boroughs and demonstrates a supply imbalance. In terms of future pipeline, an estimated 836 beds will be delivered in Lewisham, which is not sufficient to bridge the gap between demand and supply. Overall, it is considered that there is considerable and growing need for private PBSA that is well-connected to serve multiple universities.</p> <p>It is therefore considered that that statements made in paragraph 7.57 need to reviewed and carefully considered given that within the Boroughs evidence base there has been no assessment or consideration of existing and future PBSA need. In respect of nomination agreements, draft policy requires that "the accommodation is secured for use by students, as demonstrated by an agreement with one or more specific higher education provider(s)".</p> <p>It is considered that the policy wording should be amended to allow for greater flexibility on the quantum of student bedrooms that should be secured via a nomination agreement for occupation by students, as the current draft wording implies this is applicable to all student units, which would not meet London Plan policy requirements. The provision of a high</p>	<p>housing. Consequently, the considers the policy justified in seeking to secure firm guarantees that new student accommodation is genuinely required to accommodate the student population. Furthermore, the Council considers that is remains in the self-interest of development partners, and their financiers, to have certainty that their products will be utilised (and not sit empty).</p>	

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							<p>percentage of rooms via a nomination agreement can have an impact on scheme viability, given the sub-market values these units would achieve. This is particularly relevant to the live planning application at Apollo Business Centre, where a blended approach is being provided towards affordable housing, through the provision of conventional affordable housing and affordable student units to meet the 35% policy requirement. If a high percentage of student beds are secured via a nomination agreement (which drives a lower value per room), in addition to the quantum of affordable housing being perused (including conventional affordable), this would impact the financial viability and deliverability of the scheme.</p> <p>In light of this, it is considered there should be an element of flexibility within this element of the policy to allow for sites to be considered on a site-by-site basis. It is therefore suggested that the policy wording is amended to the following: “A portion of the accommodation is secured for use by students, as demonstrated by a legal agreement with one or more specific higher education provider(s)”. Further to the above, the proposed wording implies that for a scheme to be secured for student use, an agreement with a higher education provider is required. This fails to recognise that student housing can be secured for student use only via the planning permission itself and through management by a Student Housing Management Company.</p> <p>It is therefore suggested that the supporting text of policy H07 recognises there are alternative methods to ensuring student accommodation is secured for only student use. On other student schemes within the Borough, such as 164 - 196 Trundley’s Road, the S106 has ensured that student accommodation is secured for student use via the requirement for the applicant to enter into a legally binding contract with a Student Housing Management Company or a Higher Education Provider. A Student Management Company essentially undertakes the role of a student accommodation provider on behalf of Education Institutions. Recognition of alternative methods to secure student housing allows flexibility to ensure the student accommodation can be delivered. It is our intention to secure wording to this effect should the proposals at Apollo Business Centre be successful.</p>		
CON048	REP252	DP9 OBO			2	EC4	<p>POLICY EC4 LOW-COST AFFORDABLE WORKSPACE The Draft Local Plan outlines Lewisham’s aspiration to secure affordable workspace in commercial schemes. Policy EC4 requires 10% of rentable floorspace (Net Internal Area) in future commercial development for office and industrial to be provided as affordable (at 50% of market rent). Whilst the importance of</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 4 Low-cost and affordable workspace.</p> <p>For clarity, the policy, and its supporting text highlight that technical evidence</p>	No further action required in relation to the new Local Plan.

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		Fosfel Apollo Limited					<p>an affordable offer as part of new commercial developments is recognised, it is crucial that an element of flexibility is applied so as to not impact the viability of schemes and prejudice the delivery of development. It is therefore recommended that the policy is amended to reflect the scale of development, commercial floorspace thresholds and other site specific considerations.</p> <p>The draft policy is inconsistent with adopted London Plan Policy E3, which recommends the introduction of affordable workspace policies in light of local evidence of need and viability, including policies on site-specific locations, rather than a blanket approach.</p>	<p>demonstrates that rising commercial sales and rental rates and the lack of low-cost and affordable workspace is an important economic and growth issue across the Borough. It continues by stating that the cost and availability of workspace can create a barrier to entry in the local economy and wider community, posing challenges for businesses and groups seeking to locate to, start-up or expand in Lewisham. This is particularly true for micro, small, and independent businesses as well as social enterprises, charities, and voluntary organisations.</p> <p>The Council remains mindful that policy interventions can, under certain specific circumstances, have an impact on development viability – and in the very worst cases can prevent growth coming forward in a timely fashion. For that reason, the Council has sought to fully integrate viability testing across the plan-making. It is noted that the latest viability evidence demonstrates that there is no adverse impact of the new Local Plan's policies at plan-level.</p> <p>Nevertheless, should exceptional site-specific circumstances present themselves there is sufficient flexibility within national planning policy and guidance to inform decision-taking. Within that context it is for development partners to present a sound case that justifies an exceptional approach to this issue should it demonstrably arise.</p>	
CON048	REP2453	DP9 OBO Fosfel Apollo Limited			2	EC6	<p>POLICY EC6 LOCALLY SIGNIFICANT INDUSTRIAL SITES (LSIS)</p> <p>Draft Local Plan Policy EC6 states that development proposals should ensure there is no net loss of industrial capacity within LSIS and seek to deliver net gains where possible. The co-location of employment and other compatible uses will be permitted at selected LSIS. Fosfel Apollo welcomes the Site's release from SIL and re-designation to a LSIS as part of the Draft Local Plan. This release has formed part of a plan-led process and demonstrates a clear direction of travel for the Site. LBL have designated land at Bermondsey Dive-Under, informed by the wider Evidence Base, to provide substitute</p>	<p>The Council welcomes the support offered in relation to the new Local Plan Policy EC 6 Locally Significant Industrial Sites (LSIS).</p> <p>The Council also notes and welcomes the broad support provided in relation to the allocation of land at the Bermondsey Dive Under site as replacement Strategic Industrial Location land under the new Local Plan Policy EC5 Strategic Industrial</p>	No further action required in relation to the new Local Plan.

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							industrial capacity for the release of SIL at the Site. Under the emerging LSIS designation, co-location of employment and other compatible uses will be supported. Overall, our Client supports the release of the Site from LSIS and the flexible approach to the colocation of compatible uses at selected LSIS (including the Apollo Business Centre) to secure the long-term viability of LSIS and facilitate renewal and regeneration.	Locations (SIL) and Policy LNA SA 08 Bermondsey Dive Under.	
CON049	REP254	Q Square OBO Vision Construct Ltd and Evelyn Court (Deptford) LLP			3	General	<p>On behalf of our clients, Vision Construct Ltd and Evelyn Court (Deptford) LLP, we are writing to make representations in respect of the Regulation 19 Version of the Lewisham Local Plan ('the Draft Plan').</p> <p>Both of my clients have an interest in the site known as Evelyn Court, Grinstead Road, London, SE8 5AD ('the Site'). Evelyn Court (Deptford) LLP is the site owner and Vision Construct are looking to redevelop the Site. This Site is subject to a wider draft Site Allocation (No. 3) within the Draft Plan. The draft Site Allocation area is made up of Evelyn Court and the former Parker House site. As outlined above, Vision Develop will be looking to redevelop Evelyn Court (shown in red outline in Figure 1), The former Parker House site (shown in yellow outline in Figure 1) is owned by Lewisham Council ('The Council').</p> <p>My clients have been in pre-application discussions with the London Borough of Lewisham regarding the redevelopment potential of the Site. They have also been speaking to the Council's Estates Department about the opportunity for a comprehensive scheme being delivered between the Evelyn Court portion of the Site and Parker House.</p> <p>My clients are supportive of the Draft Plan in principle and believe that it is positive that the Council is progressing a new Local Development Framework to help to shape development within the Borough. Our comments on the relevant parts of the Draft Plan are set out below. These comments are considered in the context of the NPPF's 'tests of soundness'.</p>	The Council notes Q Square's introductory comments and welcomes their in-principal support of the Draft Local Plan.	No further actions required in relation to the new Local Plan.
CON049	REP255	Q Square OBO Vision Construct Ltd and Evelyn Court			3	LNA SA 03	<p>In terms of Draft Site Allocation 3 (Evelyn Court at Surrey Canal Road Strategic Industrial Area), we are supportive of this draft Allocation in principle and it will help to bring a currently underutilised and unattractive site to deliver better quality employment floorspace and new homes.</p> <p>We have the following more detailed comments on the draft Site Allocation:</p> <ul style="list-style-type: none"> • In terms of the Indicative Development Capacity we note that this is only an estimated capacity (102 homes and 2,381 	<p>The Council notes and welcomes the in-principal support offered in relation to the new Local Plan Policy LNA SA 03 Evelyn Court at Surrey Canal Road Strategic Industrial Location.</p> <p>For clarity, the new Local Plan identifies indicative development capacities for all its site allocations. These indicative capacities have been identified through a desk top</p>	No further actions required in relation to the new Local Plan.

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		(Deptford) LLP					<p>sqm of employment floorspace). However, having undertaken pre-application work on the wider draft Site Allocation, we consider that an indicative provision should be 170 new homes and 1,800 sqm new commercial floorspace. The provision of 1,800 sqm would ensure the reprovision of the existing commercial floorspace on site. We consider that this amendment will ensure that the draft Plan is Effective; and</p> <ul style="list-style-type: none"> • Under ‘Development Requirements’, the draft Site Allocation states that: “New and improved public realm in accordance with a site-wide public realm strategy, including improved connections between The Deptford Landings development at Oxestalls Road, Deptford Park and along the route of the former Surrey Canal and to facilitate the delivery of Cycleway 4.” The land along the route of the former Surrey Canal is not within the ownership of neither Evelyn Court (Deptford) LLP nor the Council. We therefore consider the part of this requirement underlined above is not reasonable and is not necessarily deliverable and should be removed. We consider that this amendment will ensure that the draft Plan is Justified. We trust that the information submitted is helpful in informing the progress of the draft Plan. Should you have any queries in the meantime, please do not hesitate to contact me. 	<p>methodology. These are intended to provide a conservative estimate of capacity that can then inform discussion and negotiation to secure optimal development capacity/ yields through the decision-taking process.</p> <p>The Council notes the comments made in relation to the indicative capacities identified in the new Local Plan Site Allocations. The suggestion that the Council revisits the approach to indicative capacities is unnecessary. The new Local Plan’s policy approach to this matter, set out under Policy QD 6 Optimising Site Capacity providers development industry partners, and decision-takers with a flexible approach to this matter. This provides the opportunity for development proposals to demonstrate the optimal capacity of sites by presenting evidence to the decision-taking process. The Council considers this approach sound.</p> <p>The Council notes the comments relating to the policy requirement that the redevelopment of the site contributes towards facilitating the adjoining Cycleway 4. The Council considers this to be a reasonable requirement as it will result in the site having access to a necessary transport infrastructure network. Furthermore, the Council notes that whilst the adjoining land (for the cycleway) may not be in both parties’ control such requirements are not unusual – typically being addressed through Section 278 agreements (involving the local transport authority). For these reasons, the Council considers the policy sound.</p>	
CON049	REP256	Q Square OBO Vision Construct Ltd and Evelyn			2	QD4	Policy QD4 and Figures 5.1 and 5.3 – we are supportive of this draft policy and these images which confirm that the Site is an Appropriate Location for a Tall Building and that within the sub-area that the Site is located in, up to 35 storeys would be permitted;	The Council notes and welcomes the support offered in relation to the new Local Plan Policy QD4 Building Heights.	No further action required in relation to the new Local Plan.

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		Court (Deptford) LLP							
CON049	REP257	Q Square OBO Vision Construct Ltd and Evelyn Court (Deptford) LLP			2	HO1	Policy HO1 Criteria (F) – we consider that an additional exception criteria should be added for co-location sites, where an increased provision of family accommodation may not be appropriate if industrial uses and servicing are proposed at lower levels, below residential. We consider that this amendment will ensure that the draft Plan is Justified;	<p>The Council notes the comment made in relation to the new Local Plan Policy HO 1 Meeting Lewisham’s housing needs – specifically in respect of managing mixed-use sites comprised of industrial uses at lower levels.</p> <p>The Council welcomes the comments and concern expressed by development partners in respect of this matter. The Council remains committed to meeting Lewisham’s housing needs – and at the same time securing good quality, safe and optimised developments. Within this context, the new Local Plan sets out objectives under Chapter 5 High Quality Design. Notably this includes new Local Plan Policies QD 1 Delivering high quality design in Lewisham and QD 2 Inclusive and safe design. The Council considers that these provide a suitable mechanism for decision-taking that would allow for the successful determination of matters such as that raised in this representation. The Council considers this approach sound.</p>	No further actions required in relation to the new Local Plan.
CON049	REP258	Q Square OBO Vision Construct Ltd and Evelyn Court (Deptford) LLP			2	EC2	<p>Policy EC2 and paragraph 8.10 – this Policy requires at least re-provision of the existing industrial capacity. This refers to the requirement to also consider demolished floorspace on vacant sites. We consider that this requirement may result in many schemes being undeliverable or having a significant reduction in other planning benefits.</p> <p>The London Plan defines Industrial floorspace capacity as “either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio, whichever is the greater.”. We consider that this amendment will ensure that the draft Plan is Effective and consistent with the London Plan.</p>	<p>The Council notes the comment made in relation to the new Local Plan Policy EC 2 Protecting employment land and delivering new workspace – specifically in relation to the definition of industrial floorspace capacity.</p> <p>Although the Council recognises that the Borough’s economic profile is changing, the demand for industrial employment floorspace remains. Within this context it is noted that the Greater London Authority are now referring to recently published data which suggests that demand for industrial floorspace continues to be high and may in the future exceed supply.</p> <p>The decision-taking process continues to provide development partners with the opportunity to demonstrate innovative</p>	No further actions required in relation to the new Local Plan.

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								<p>and alternative approaches to meeting employment floorspace needs. The Council suggests that this provides an appropriate and effective mechanism for responding to changing employment demand, and concurrently securing the optimal use of development sites. The Council concludes that this approach is sound.</p> <p>Furthermore, the new Local Plan sets out how proposals for the colocation of employment and other compatible uses are addressed under Policy EC 6 Locally Significant Industrial Sites (LSIS). This states that development proposals should ensure that there is no net loss of industrial capacity within these locations and seek to deliver net gains wherever possible.</p> <p>Finally, the reference to a London Plan definition/ approach to industrial floorspace capacity is noted. However, upon study the source reveals that this reference is in specific relation to the provision of affordable housing on Strategic Industrial Locations, Locally Significant Industrial Sites or Non-Designated Industrial Sites (London Plan Policy H5 Policy H5 Threshold approach to applications Paragraph 4.5.7). For that reason, the Council maintains that the new Local Plan approach remains sound.</p>	
CON049	REP259	Q Square OBO Vision Construct Ltd and Evelyn Court (Deptford) LLP			2	EC6	<p>Policy E6 Part (E) – we consider that this part of the policy should be written so that if any of the individual criterion (a) to (d) of this part of the policy are met then a net loss in industrial capacity is considered reasonable. This is on the basis that the threshold for meeting all criteria ((a) to (d)) is considered high. If full reprovision of industrial capacity is difficult to achieve on a specific site, it may render the scheme proposal unviable for redevelopment unless greater flexibility is allowed, namely demonstrating compliance with one of criteria (a) to (d) rather than all of them. We therefore consider that the word ‘or’ should be included after each criteria. We consider that this amendment will ensure that the draft Plan is Positively Prepared.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 6 Locally Significant Industrial Sites (LSIS) – specifically in relation to the requirements for considering proposals for the co-location of uses on LSIS sites that result in the net loss of industrial capacity (Policy EC 6 E).</p> <p>The respondent is correct that the threshold for positively considering proposals that result in the net loss of industrial capacity is high. The Council considers that this is justified given the</p>	No further actions required in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
								important role played by Locally Significant Industrial Sites in contributing towards meeting the Borough's employment needs. Furthermore, it is noted that the collective requirements identified under Policy EC 6 E are themselves inter-related and any disaggregation or reduction could result in a harmful impact upon the Locally Significant Industrial Site. The Council maintains that the policy is sound.	
CON050	REP260	Turley OBO The Arch Company			3	LNA SA 08 Introduction	<p>THE LEWISHAM DRAFT LOCAL PLAN (REGULATION 19, JANUARY 2023) & PROPOSED CHANGES TO THE ADOPTED POLICIES MAP (DECEMBER 2022) WRITTEN REPRESENTATIONS ON BEHALF OF THE ARCH COMPANY PROPERTIES LP</p> <p>We write on behalf of The Arch Company Properties LP ("The Arch Company") with respect to the Public Consultation on the emerging Lewisham 'Proposed Submission Document' Draft Local Plan (Regulation 19, January 2023) [hereafter: "Draft Local Plan"] and Proposed Changes to the adopted Policies Map (December 2022).</p> <p>These written representations follow a previous set of representations made by our client in relation to the Public Consultation on the previous iteration of the Draft Local Plan (Regulation 18, January 2021) and Proposed Changes to the adopted Policies Map (December 2020). The principal subject of those – and these – written representations is the proposed addition of the Bermondsey Dive Under area to the Surrey Canal Road Strategic Industrial Location ("SIL").</p> <p>Whilst our client is supportive of the emerging Local Plan in principle, for the reasons set out below, we consider that further revisions are still required to make the Plan 'sound' in respect of paragraph 35 of the National Planning Policy Framework.</p> <p>The Arch Company & LB Lewisham Portfolio It is considered that it will be helpful to provide some background information on The Arch Company's activities nationally and their portfolio within the borough. The Arch Company acquired Network Rail's former commercial estate business in 2019. It is the landlord for more than 4,000 businesses across England and Wales, making it the UK's largest small business landlord, working with thousands of business owners, from car mechanics to bakeries and restaurants, who make a unique and vital contribution to the UK economy.</p>	<p>The Council notes the introductory comments made in relation to the new Local Plan Policy LNA SA 08 Bermondsey Dive Under.</p> <p>The Council welcomes the broad level of support offered in respect of the new Local Plan Policy LNA SA 08. The Council remains committed to working positively with development industry partners to deliver the planned-for growth set out in the new Local Plan – securing sustainable and high-quality places for the Borough.</p> <p>The Council notes and acknowledges the role that the Arch Company could play in delivering the new Local Plan's objectives – specifically in terms of contributing towards meeting the Borough's economic and employment needs but also towards objective of sustainable place-making.</p> <p>For clarity, whilst the representations speak to the respondent as being a "landowner", it is understood that this is not entirely the case at the Bermondsey Dive Under site. Network Rail has informed the Council that they remain the freeholder across the entire site allocation and that the Arch Company are a leaseholder for a component part of the wider site – specifically the railway arches that form the northern boundary.</p>	No further actions required in relation to the new Local Plan.

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							<p>In regard to the potential implications of the emerging Draft Local Plan it is of importance to identify that The Arch Company has substantial land holdings within the borough, specifically in the Bermondsey Dive Under area and the land proposed to be designated as an addition to the Surrey Canal Road SIL in order to release other parts of this designation for redevelopment, namely sites at Evelyn Court, Trundleys Road and the Apollo Business Centre.</p> <p>Being the majority landowner in this area and taking account of the full scale of The Arch Company's portfolio in the borough (totalling approx. 760,000 sq ft of business and employment space/land including, but not limited to, hundreds of railway arches), the potential implications of the Draft Local Plan are of significant importance (see Annex 1 of our previous set of written representations for an overview of The Arch Company's landholdings in and around Bermondsey Dive Under and the wider borough).</p> <p>The Arch Company's portfolio includes a large number of railway arches and associated land located to the south of Silwood Street within the Bermondsey Dive Under area. The railways arches and the land in question have a lawful use of Class E(g) and B8, as confirmed via Certificates of Lawfulness issued in 2021 (refs. DC/21/121625 and DC/21/121626). As such, our client has a strong interest in ensuring that the Draft Local Plan creates a strong, flexible and ambitious, but at the same time realistic, planning framework in order to facilitate the sustainable growth the borough requires.</p>		
CON050	REP261	Turley OBO The Arch Company			2	EC 02	<p>Draft Policy EC2 (Protecting employment sites and delivering new workspace), Table 8.1 & Proposed Changes to the adopted Policies Map (December 2022) Chapter 8 of the Draft Local Plan sets out the Council's ambition for a thriving economy and the protection and/or potential of employment and industrial land.</p> <p>To this extent, it is noted that the Council proposes the release of three individual sites (Evelyn Court, Trundleys Road and the Apollo Business Centre) from the overarching Surrey Canal Road SIL for redevelopment to provide a mix or co-location of uses including employment and/or residential.</p> <p>Given the protection of SIL and requirements contained in the London Plan (i.e. Policy E4) for its release and/or substitution, the emerging Local Plan and associated proposed changes to the adopted Policies Map seek to increase the boundary of the SIL to the north-west to include the Bermondsey Dive Under</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 02 Protecting employment land and delivering new workspace.</p> <p>For clarity, the Council notes that the policy identifies the forecast need for net additional employment floorspace in the Borough during the period until 2038. The policy then sets out how the new Local Plan will meet this need through the delivery of new grow that Strategic Industrial Locations; Locally Significant Industrial Sites; Mixed-use Employment Locations; and through the redevelopment of sites outside of designated employment areas. It is unclear why the respondent considers the policy unsound – as the</p>	No further actions required in relation to the new Local Plan.

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							<p>area, which includes one of our client's most significant land holdings (i.e. the land to the south of Silwood Street) in the borough.</p> <p>As set out in detail in our previous set of written representations, our client considers that their land holding at Bermondsey Dive Under is well-suited to provide a continued (and lawful) range of employment uses (including 'softer' non-SIL uses within the outward-facing railway arches which can co-exist with surrounding and emerging residential uses); however, from a planning policy perspective, it is strongly considered that this site should continue to be treated as a Non-Designated Industrial Site or, if robustly justified, as LSIS, as its setting, constraints and surroundings are not deemed suitable to support and/or justify a SIL designation (when assessed against the London Plan which identifies other characteristics which are typical to SILs). This will be reflective of the current lawful uses on the site and adjacency to residential properties.</p> <p>It is noted that further changes have been made within this consultation round with the railway arches being designated as LSIS and the wider curtilage/land being designated as SIL. It is considered that this approach is not sound, and it would result in likely operational conflicts with potential non-SIL uses operating in the railway arches not being able to use the adjacent yard space. It is therefore strongly recommended to amend the Draft Local Plan accordingly (i.e. Table 8.1 and the Proposed Changes to the adopted Policies Map) to a single consistent LSIS designation in order to ensure that it is robustly prepared, justified and sound in relation to this matter – and can therefore be fully supported by our client forming a strong framework for future development in the Bermondsey Dive Under area.</p>	<p>Bermondsey Dive Under site will undoubtedly in some form or another contribute towards meeting the Borough's needs.</p> <p>For further clarity, the Council reiterates the response provided at the Regulation 18 consultation stage. Namely, that for the new Local Plan to be compliant with the London Plan, co-location at Evelyn Court, Trundleys Road and the Apollo Business Centre requires that these sites are redesignated as Locally Significant Industrial Sites and that compensatory new Strategic Industrial Location be identified. The Council maintains that this is a sound approach. It is noted that the respondent has not suggested an alternative.</p> <p>The Bermondsey Dive Under Site has been identified as an appropriate suitable, available, deliverable and developable site for designation as compensatory Strategic Industrial Location site that is in proximity to the wider Surrey Canal Strategic Industrial Location.</p> <p>The Council continues by reiterating the fact that the new Local Plan Policy LNA SA 08 is entirely cognisant of the possible constraints associated with the Bermondsey Dive Under site. For clarity, the site allocation has a dual employment designation. Much of the site allocation is designated as Strategic Industrial Location. However, the Railway Arches component is designated as Locally Significant Industrial Site. The specifies the types of industrial uses suitable for that part of the site and takes full account that residential properties are being built at the adjacent Silwood Street site allocation. The Council considers this approach sound – resolving the concerns expressed by the respondent.</p>	
CON050	REP262	Turley OBO			2	EC 09	<p>Draft Policy EC9 (Railway Arches)</p> <p>As one of the majority landowners of railway arches in the borough, our client welcomes the Council's recognition that</p>	The Council notes the comments made in relation to the new Local Plan Policy EC 09 Railway arches. The broad level of support	No further actions required in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
		The Arch Company					<p>“there are opportunities to maximise the use of the space of [railway] arches and the ancillary land adjacent to them” (para. 8.52).</p> <p>As set out above, operating a vast number of railway arches across London, The Arch Company considers that these can cater for a wide range of uses and occupiers and be a significant contributor to the Council’s ambition of building a strong economy.</p> <p>Our client therefore approves of the Council’s amendments to Part A of EC9 to note that railway arches have the potential to positively contribute to the vitality and vibrancy of an area and to promote its resilience through the provision of a wide range of commercial, industrial, community, cultural or similar Sui Generis uses.</p> <p>In relation to Part B of Policy EC9 – and as set out in our previous written representations – it is recognised that a number of railway arches may offer low-cost business space; however, these are market levels and reflective of their (often) lower specification and non-prime locations (as acknowledged in para. 6.2.4 of the London Plan and elsewhere in the Draft Local Plan, i.e. para. 8.23). Similarly, there is a significant difference between open arches accommodating a simple storage function and those that are (subsequently) refurbished to a higher specification attracting different types of uses and occupiers. We would therefore reiterate the need to differentiate between existing low-cost (i.e. as described above) and affordable (i.e. as secured through a Section 106 Agreement) business space. Such a requirement is needed to be consistent with the London Plan (Policy E3 Affordable workspace). Where such an obligation exists for a site or where railway arches form part of a wider (comprehensive) redevelopment, it is considered acceptable to link it to the requirements of Draft Policy EC4 (Low-cost and affordable workspace); however, in all other cases the nature of a proposed development will need to be fully considered, as future investment in or upgrading existing railway arches to an enhanced specification may otherwise be constrained or undermined (i.e. if such future rent levels would not be reflective of their higher quality specification or a change of use).</p> <p>For this reasoning, it is deemed that the policy as drafted is not effective under the relevant tests. Therefore, and to be deemed sound, whilst our client is therefore appreciative of the amendments that have been made to clarify this point, it is</p>	<p>offered to policy maximising the place-making and economic opportunities provided by railway arches is welcomed.</p> <p>Policy EC 09 A The Council notes the comments made in relation to this part of the policy and is pleased that the respondent approves of the changes introduced following the Regulation 18 consultation stage.</p> <p>Policy EC 09 Part B Retention of lower-cost or affordable workspace The Council notes the comments made in relation to this aspect of the policy. The Council remains committed to securing provision that can meet a diverse range of employment needs – including affordable employment floorspace. Railway arches are a form of lower cost or affordable employment land provision. That is a fact.</p> <p>For clarity, the new Local Plan’s Viability Assessment tested the viability of the requirements for affordable workspace. For this reason, the requirement is viable and justified.</p> <p>Furthermore, the Council considers that the new Local Plan provides sufficient flexibility to consider site specific matters, and market signals, as they arise through development proposals. Where these are evidentially shown to have a demonstrable impact on the ability to provide lower-cost or affordable employment floorspace, the decision-taker can make a judgement based on the information provided. This is a reasonable and sound approach.</p> <p>Policy EC 09 Part C Accessibility The Council notes the specific comments in relation to the requirement that –</p> <p><i>“Proposals must also investigate and maximise opportunities to improve accessibility by walking and cycling...”</i></p>	

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							<p>considered that there remains the potential for misconceptions in this area with regards to wider policies in the Draft Local Plan (i.e. Draft Policy EC4 referred to above).</p> <p>As set out in our previous set of written representations, we would therefore recommend</p> <p>1) removing the reference ‘lower-cost’ workspace from Part B of the draft policy wording and/or 2) covering the provision of affordable workspace only in Draft Policy EC4 only which defines the relevant trigger points, with this not being duplicated in EC9.</p> <p>Whilst our client is generally supportive of the Council’s aspirations to improve accessibility, it is considered that Part C of the draft policy wording does not fully reflect the commercial challenges associated with providing connections through arches (especially on more complicated sites where re-development projects already have to deal with significant pressures on viability).</p> <p>To ensure that the policy is robustly justified it is suggested that the policy wording should therefore be amended to state that: “Proposals must also investigate and maximise opportunities to improve accessibility by walking and cycling, including connections through existing arches where feasible, appropriate and viable.”</p> <p>In addition, it is considered that Part C should only be a material consideration for open and/or long-term vacant railway arches rather than all railway arches (including those completed and/or previously/currently occupied). Converted and occupied railway arches are no different from any other commercial and/or employment premises and, just as it would be unreasonable to propose cutting a route through, say, an existing warehouse, it is neither reasonable nor justifiable to expect applicants to consider doing so as part of all proposals relating to the use of railway arches. The wording as currently proposed is not therefore considered to be robustly justified.</p> <p>Whilst we recognise the importance of consultation with key stakeholders prior to the submission or during the determination of a planning application, it is considered that the second sentence of Part E is in practice superfluous. Where they have interests in the railway lines above the relevant arches and/or adjoining highway land that would be affected by development proposals, Network Rail, Transport for London</p>	<p>Contrary to the respondent’s opinion, the Council is entirely cognisant of the possible challenges that may present themselves in providing access across active industrial sites. The Council considers that the policy wording is reasonable and sufficiently flexible enough to provide decision-takers with opportunities to make judgements based upon evidence provided in support of proposals. Securing access and permeability is a key component of successful place-making, which itself positively contributes towards the viability (and marketability) of the finished development product. There are numerous examples, involving railway arch sites, of where this is the case, including the Bermondsey Dive Under site. The Council maintains that the policy is sound.</p> <p>Policy EC 09 Part E The Council notes and discounts the comments made in relation to consultation and engagement with development and infrastructure partners. The Council considers it entirely reasonable that relevant (as listed) development and infrastructure partners be involved in proposals – particularly through master planning and design-led approaches.</p> <p>The Council acknowledges that this may not be necessary for all forms/ scales of development. It is reasonable that the decision-takers provide a judgement on this matter and that a proportionate level of negotiation/ engagement is carried out through decision-taking. The Council considers this approach sound.</p>	

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							<p>("TfL") and the Highway Authority will be consulted in their capacity as statutory consultees.</p> <p>In addition, and in regard to impacts on the railway network, this is considered to duplicate wider national regulations on safety on the railway network. This is therefore not considered to be effective and/or justified. Our client is keen to avoid a situation in which the prior consultation of these authorities is required for even the most minor of works/change of use – as, it is anticipated, are they, given current resourcing constraints. We would therefore request that this element is either 1) amended to clarify that these authorities will be consulted where required in their capacity as statutory consultees or 2) removed from Part E altogether.</p>		
CON050	REP263	Turley OBO The Arch Company			3	LNA SA 08	<p>Conclusion</p> <p>Overall, and as set out above, The Arch Company remains supportive of the general direction of the Draft Local Plan and relevant emerging policies contained within it, but – as set out in detail in the previous set of representations – strongly disagrees with the addition of their land holding at Bermondsey Dive Under to the Surrey Canal Road SIL, which is considered to be unjustified and likely to undermine future development opportunities within the area and/or negatively impact upon surrounding residential uses.</p> <p>Through the granting of planning permission ref. DC/20/116783 the LPA have confirmed that the character and context of Silwood Street has evolved to be that of a mix of uses and, therefore, a SIL designation is not deemed appropriate.</p> <p>Our client is supportive of the Council's amendments to the proposed railway arches policy (Draft Policy EC9); however, and to be considered 'sound', they have proposed several further suggestions to ensure that the policy is sufficiently clear and effective, so as to enable the delivery and operation of these arches in an optimum manner which adequately reflects occupier demand, day-to-day operational/letting requirements and market conditions. It is further considered that the vision and policies contained in the Draft Local Plan have the potential to meet the Council's ambitions of delivering good, sustainable growth in the borough during the plan period.</p> <p>Our client and we ourselves are more than happy to engage in positive and pro-active discussions with LB Lewisham if this is considered to assist the Council in preparing a sound and</p>	<p>The Council notes and welcomes the broad level of support offered to the new Local Plan. The specific concluding comments, particularly in relation designation of the Bermondsey Dive Under site as part Strategic Industrial Location and part Locally Significant Industrial Site are noted and discounted.</p> <p>The Council reiterates the response provided at the Regulation 18 consultation stage. Namely, that for the new Local Plan to be compliant with the London Plan, co-location at Evelyn Court, Trundleys Road and the Apollo Business Centre requires that these sites are redesignated as Locally Significant Industrial Sites and that compensatory new Strategic Industrial Location be identified. The Council maintains that this is a sound approach. It is noted that the respondent has not suggested an alternative.</p> <p>The Bermondsey Dive Under Site has been identified as an appropriate suitable, available, deliverable, and developable site for designation as compensatory Strategic Industrial Location site that is in proximity to the wider Surrey Canal Strategic Industrial Location.</p> <p>The Council continues by reiterating the fact that the new Local Plan Policy LNA SA 08 is entirely cognisant of the possible</p>	No further action required in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							deliverable new Local Plan, and to bring forward new development across their portfolio over the coming years.	constraints associated with the Bermondsey Dive Under site. For clarity, the site allocation has a dual employment designation. Much of the site allocation is designated as Strategic Industrial Location. However, the Railway Arches component is designated as Locally Significant Industrial Site. The specifies the types of industrial uses suitable for that part of the site and takes full account that residential properties are being built at the adjacent Silwood Street site allocation. The Council considers this approach sound – resolving the concerns expressed by the respondent.	
CON051	REP264	Carney Sweeney OBO The Renewal Group			3	LNA SA 09	LEWISHAM LOCAL PLAN : Regulation 19 stage “Proposed Submission” document, January 2023 Representations on behalf of The Renewal Group We act on behalf of The Renewal Group who are the developers of the New Bermondsey site (part of the Surrey Canal Triangle site) in the North Area of the London Borough of Lewisham. The representations below are made having regard to the development of this site.	The Council notes Carney Sweeney’s introductory comments in relation to the North sub area’s site allocation 09 Surrey Canal Triangle Mixed Use Employment Location.	No further actions required in relation to the new Local Plan.
CON051	REP265	Carney Sweeney OBO The Renewal Group			3	QD 04	Policy QD4 Building Heights We note that the policy has been largely revised from the Regulation 18 version. Policy D9 of the London Plan requires that local authorities identify appropriate areas for tall buildings but also sets out the need for proposals to meet other criteria through the planning process to establish exact heights. We note and support Figure 5.3, which anticipates up to 45 storeys on Renewal’s land (New Bermondsey) (based on the townscape and other analysis which led to the Resolution to Grant Planning Permission of January 2022 under application reference: DC/20/119706). However, in anticipation of possible delivery of major infrastructure over the plan period (for example, Surrey Canal Overground Station and the extension of the Bakerloo Line), in part B of the policy, flexibility should be incorporated to respond to such emerging areas of infrastructure improvements over the whole plan period. This is consistent with paragraph 22 of the NPPF and as such is requested for soundness. appropriate wording should be incorporated in this regard, such as: “Development proposals for tall buildings outside of these zones will be resisted, except	The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy QD 04 Building Heights – specifically in terms of the support offered in respect of the North Deptford tall building suitability zones identified under Figure 5.3. The further comments made in respect of providing further flexibility for proposals seeking taller new buildings in the wake of anticipated public transport investment are noted. For clarity, the Council highlights that the new Local Plan’s approach towards tall new buildings is based on a comprehensive technical evidence base that considers a range of factors. These already include consideration of accessibility – to transport, housing, jobs, facilities, and other infrastructure networks. Furthermore, the new Local Plan Policy QD 04 has been prepared in accordance with the London Plan Policy D9, which clearly	No further actions required in relation to the new Local Plan.

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							<p>where major improvements in infrastructure are made over the whole plan period.”</p> <p>Part C should refer to Figure 5.1 - Tall Buildings Suitability Plan, for clarity. We still have concerns around the use of “exceptionally good” design in D(b) and would draw your attention to the wording in the London Plan Policy D9 (Tall Buildings) Part C (c), which states: “architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan” (our emphasis) We consider the council’s requirement for “exceptionally good” is too subjective, inconsistent with the London Plan and will, therefore, fail to be effective.</p> <p>We note that the wording of D(d) refers to “unacceptable adverse ... impacts” (our emphasis) and we would ask that this clarity is included in D(f), which still confirms that tall buildings “Will not adversely impact...”. The current wording is inconsistent with national policy. Further, guidance documents in relation to such matters always refer to the need to take a flexible approach and the current wording does not facilitate this.</p> <p>We note Part F references DM4 and should reference DM3 (Masterplans and comprehensive development).</p>	<p>states the requirement that plan-makers determine appropriate maximum heights and identify those heights and locations within local plans.</p> <p>For these reasons, the Council considers that the policy is sound.</p> <p>Finally, the comment made in respect of consistency between the new Local Plan and the London Plan is noted and discounted. For clarification, the London Plan is part of Lewisham’s Development Plan. As such, there is no need for the new Local Plan to slavishly repeat its content.</p>	
CON051	REP266	Carney Sweeney OBO The Renewal Group			3	QD 08	<p>Policy QD8 High Quality Housing Design</p> <p>Part G of this policy has been amended from the Regulation 18 version to confirm that the council will be particularly resistant to single aspect north facing dwellings. However, London Plan Policy D6 Part C states: “A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity”</p> <p>Policy QD8 Part G should be amended to clarify the need to optimise site capacity in line with Policy QD6 in order to comply with London Plan policy and render policy QD8 sound.</p>	<p>The Council notes the comment made in relation to the new Local Plan Policy QD 08 High quality housing design.</p> <p>The Council remains committed to securing high quality design – as a key component of successful place-making and as a mechanism for delivering planned-for growth. In respect of the latter, the Council believes that the requirement for high quality design is a key instrument in meeting the Borough’s needs and by implication a mechanism for optimising site capacity.</p> <p>The new Local Plan must be read and considered in its entirety. In this respect, the Council concludes that there is no conflict between Policy QD 06 and QD 08. For this reason, the policy is considered sound.</p>	No further actions required in relation to the new Local Plan.

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								Finally, the comment made in respect of consistency between the new Local Plan and the London Plan is noted and discounted. For clarification, the London Plan is part of Lewisham's Development Plan. As such, there is no need for the new Local Plan to slavishly repeat its content.	
CON051	REP267	Carney Sweeney OBO The Renewal Group			3	HO 3	Policy HO3 Genuinely Affordable Housing Affordable housing provided as part of Build to Rent (BTR) developments in line with Policy H11 of the London Plan should be supported and needs to be set out in the Lewisham Local Plan. We note that the definition of Build to Rent in the Glossary to the Local Plan (Regulation 19 proposed submission document) references London Plan Policy H11 and Build to Rent is referenced in the definition of "Affordable Housing for Rent" in Technical Appendices A and D in the Strategic Housing Market Assessment 2021/22, which forms part of the evidence base, but there is no direct reference to BTR in Policy HO3. This should be rectified to make policy HO3 consistent with the London Plan and meet the tests of soundness.	The Council notes the comment made in relation build to rent housing products. The comment made in respect of consistency between the new Local Plan and the London Plan is noted and discounted. For clarification, the London Plan is part of Lewisham's Development Plan. As such, there is no need for the new Local Plan to slavishly repeat its content. This is particularly the case in this instance as London Plan Policy provides direct guidance for decision-takers. The new Local Plan does not inhibit this occurring and it remains within the gift of applicants to propose this affordable product.	No further actions required in relation to the new Local Plan.
CON051	REP268	Carney Sweeney OBO The Renewal Group			3	EC18	Policy EC18 Culture, Creative Industries and the Night-time Economy This new policy has been extracted from Policy EC1 (A Thriving and Inclusive Local Economy) in the Regulation 18 version. Part B of this new policy protects existing cultural venues and uses, and subparagraph (b) confirms that loss of these will only be permitted if a period of sustained marketing has failed to find a suitable tenant. However, it is important that such venues are only protected where they are viable and self-sustaining, and where this is a reasonable approach having regard to other objectives, including delivery of the plan. This policy should be revised to ensure there is no conflict with the strategic objectives of the local plan. It is also important that meanwhile cultural venues and uses are not protected. The wording of the policy is confusing and appears to retain meanwhile uses at the cost of new homes and employment opportunities. Part B(c) states the following: "Development proposals involving the loss of cultural venues...should be avoided. They will only be permitted where: c. The use is not a meanwhile use" There appears to be no evidence base for the retention of meanwhile or short-term uses. It is important that the policy is adjusted to provide clarity on the matters raised	The Council notes the comments made in relation to the new Local Plan Policy EC 18 Culture, creative industries, and the night-time economy – specifically in relation the viability of existing uses, and the possible impact of meanwhile uses. The Council acknowledges that external factors can have a profound impact upon the economic viability of a wide range of uses. Nothing lasts forever – indeed it is a fact that in some parts of the country residential uses are an unviable proposition. Within this context, the policy provides sufficient scope for decision-takers to consider evidence that justifies appropriate alternatives where existing uses are no longer viable. In response to the comment that existing uses only being protected if they are self-sustaining – the Council considers this to be an unreasonable requirement. It is fact that may commercial cultural uses – such as cinemas and theatres – operate at a loss	No further actions required in relation to the new Local Plan.

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							above in order to achieve the borough's strategic objectives and ensure the plan is sound.	<p>and are dependent upon cross funding from a wider business portfolio. By itself this is not an indicator of such uses being nonviable or indeed an absence of demand.</p> <p>Finally, the comment made in relation to meanwhile uses is noted. The Council acknowledges that such meanwhile uses, in cases where they are demonstrably appropriate, must be managed to ensure that they provide a temporary use for vacant sites, and facilitate the wider objective of facilitating longer-term growth objectives.</p> <p>The management of short-term or meanwhile uses are addressed by the new Local Plan under Policy DM 5 Meanwhile uses. This is clear in setting out an effective approach for temporary uses. The Council does not consider there to be a conflict between the two policies – as meanwhile uses are by their nature temporary and will be managed through the decision-taking process as such. On that basis, the Council considers Policy</p>	
CON051	REP269	Carney Sweeney OBO The Renewal Group			3	EC 4	<p>Policy EC4 Low Cost and Affordable Workspace</p> <p>This policy is new compared with the Regulation 18 version and requires that at least 10% of the net internal area of commercial floorspace (E(g), B2, B8 & sui generis) of a development proposal must be available at 50% of the open market rent or a payment for off-site provision must be made. There is also a requirement for existing low cost floorspace to be retained or reprovided. It is not clear whether this retained and/or reprovided space is in addition to the proposed new space. There appears to be no justification for the pricing proposed nor evidence of where an off-site provision might be made. It is also still not clear whether affordable workspace should be taken into account in any viability appraisals prior to the calculation of the maximum amount of affordable housing.</p> <p>We consider it inappropriate to require that B8 and sui generis floorspace should contribute to the 10% low-cost requirement given the economic scale of B8 space and the use types covered by Use Class sui generis set out in the Town and Country Planning (Use Classes) (Amendment) (England)</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 04 Low-cost and affordable workspace.</p> <p>The technical evidence supporting the new Local Plan demonstrates that the demand/ need for affordable workspace provision will continue throughout the plan period. For clarity, Paragraph 8.22 states –</p> <p><i>“Lewisham’s Employment Land Study (2019) and Local Economic Assessment (2019) identify rising commercial sales and rental rates and the lack of low-cost and affordable workspace as an important issue in the Borough. The cost and availability of workspace can create a barrier to entry in the local economy and wider community, posing challenges for businesses and groups seeking to locate to, start-up or expand in Lewisham. This is</i></p>	No further actions required in relation to the new Local Plan.

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							Regulations 2020. These matters should be clearly addressed in the policy and supporting explanatory text, and in the council's evidence base. Currently, we consider the policy does not meet the tests of soundness.	<p><i>particularly for micro, small and independent businesses as well as social enterprises, charities and voluntary organisations. The Local Plan therefore seeks to ensure that existing low-cost and affordable workspace is retained and that new provision is created as commercial development comes forward."</i></p> <p>The above position is supported through the Regulation 19 consultation – with some respondents making the specific case for new affordable provision and safeguarding of existing floorspace – particularly, where it supports business start-ups and the creative industry. For these reasons, the Council considers the policy sound.</p> <p>The suggestion that it is inappropriate for B8 and sui generis use to contribute towards affordable workspace provision is noted. This rationale for this suggestion are unclear. The Council notes that it is equally likely that new affordable workspace could be classified as either B8 or sui generis – so on that basic level it appears legitimate and reasonable that full-cost market floorspace contributes towards provision.</p>	
CON051	REP270	Carney Sweeney OBO The Renewal Group			3	EC 7	Policy EC7 Mixed Use Employment Locations (MEL) This policy needs to reflect the London Plan and permitted development rights in order to be sound.	<p>The Council notes the comment made in relation to the new Local Plan Policy EC 7 Mixed-Use Employment Locations (MELs).</p> <p>For clarity, the approach towards the Mixed-Use Employment Locations is a policy that is being brought forward from the current adopted Core Strategy. It is policy approach that has been successfully applied to proposals at these sites over the life of the current. Its success is demonstrated that all these sites are either in the process of being brought forward or are otherwise committed. There is no indication that the policy is unjustified or ineffective.</p>	No further actions required in relation to the new Local Plan.

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								<p>For further clarity, the proposals and the uses being brought forward across the Mixed-Use Employment Locations are supported by the Greater London Authority in all cases in terms of policy approach and in some through funding. It is unclear from this representation what actions need to be taken to align the policy with the London Plan.</p> <p>Furthermore, it is unclear from the representation what specific elements of the permitted development regime are being alluded to in the representation and how they relate to soundness. It is also unclear what specific measures the respondent considers are necessary to secure soundness.</p>	
CON051	REP271	Carney Sweeney OBO The Renewal Group			3	EC 11 - 17	<p>Policies EC11 – EC17 Town Centre Policies These policies need to be updated in relation to permitted development rights in order to be sound.</p>	<p>The Council notes the comments made in relation to the new Local Plan – specifically in respect of the suite of planning policies relating to town centres and retail uses. These are –</p> <p>Policy EC 11 Town centres at the heart of our communities Policy EC12 Town centre network and hierarchy Policy EC13 Optimising the use of town centre land and floorspace Policy EC14 Major and District Centres Policy EC15 Local Centres Policy EC 16 Shopping parades, corner shops and other service points Policy EC 17 Concentration of Uses</p> <p>For clarity, the new Local Plan has been prepared in accordance with the latest version of the permitted development regime (at the time of its publication). The Council considers that this is proportionate and reasonable. The Council considers these policies sound.</p> <p>It is unclear from the representation what specific elements of the permitted development regime are being alluded to in the representation and how they relate</p>	No further actions required in relation to the new Local Plan.

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								to soundness. It is also unclear what specific measures the respondent considers are necessary to secure soundness.	
CON051	REP272	Carney Sweeney OBO The Renewal Group			3	CI 1	<p>Policy CI1 Safeguarding and Securing Community Infrastructure</p> <p>This policy needs to make clear that it does not seek to protect short-term meanwhile uses. As drafted, the policy could adversely impact the delivery of the plan and there is no justification in the supporting evidence base for the retention of short-term or meanwhile uses.</p> <p>Community Infrastructure is related to the Infrastructure Delivery Plan (September 2022) and there appears to be no relevant reference to short-term or meanwhile in the evidence base. The policy wording should be clarified in this regard to meet the tests of soundness.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy CI1 Safeguarding and securing community infrastructure – specifically in relation to short-term or meanwhile uses.</p> <p>For clarity, the policy states at Paragraph 9.1 that -</p> <p><i>“Community infrastructure is also commonly referred to as social infrastructure. It covers a range of services and facilities that contribute towards inclusive and sustainable neighbourhoods and communities by providing residents and visitors with opportunities to enjoy a good quality of life. Community infrastructure includes provision for health services, education and training, community facilities (including public houses), places of faith, and sport and recreation facilities for people of all ages and abilities. Green infrastructure is also a component of social infrastructure, although it is addressed separately in this Local Plan. “</i></p> <p>For further clarification, the management of short-term or meanwhile uses are addressed by the new Local Plan under Policy DM 5 Meanwhile uses. This is clear in setting out an effective approach for temporary uses. The Council does not consider there to be a conflict between the two policies – as meanwhile uses are by their nature temporary and will be managed through the decision-taking process as such. On that basis, the Council considers Policy CI1 sound.</p>	No further actions required in relation to the new Local Plan.
CON051	REP273	Carney Sweeney OBO			3	LNA 3	<p>Policy LNA3 Creative Enterprise Zone</p> <p>It would be helpful if the extent of the CEZ was shown on Figure 8.12 in relation to Policy EC4.</p>	<p>The Council notes the comment made in relation to the new Local Plan Policy LNA 3 Creative Enterprise Zone. It is assumed that the representation may relate to Policy LNA 3 D c. It is unclear from the</p>	No further action required in relation to the new Local Plan.

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		The Renewal Group						representation why this is considered helpful or a matter of soundness.	
CON051	REP274	Carney Sweeney OBO The Renewal Group			3	LNA SA 09	<p>Site Allocation 9: Surrey Canal Triangle Mixed Use Employment Location</p> <p>The details in the allocation need to be updated, for example in relation to the following:</p> <ul style="list-style-type: none"> • The current use of the site is Millwall FC Stadium and the Millwall Community Scheme (Lions Centre), including a sports hall, a covered astro-turf pitch and surface car parking; industrial and light industrial uses with surface car parking and servicing space, together with workshop space and 27 residential units • A Section 73 application was granted in 2013 under reference: DC/13/085143. • A “clear north-south route linking South Bermondsey Station to Bridgehouse Meadows and the new Overground Station” can only be fully achieved with land beyond the control of Renewal, MFC and the Council. <p>The policy needs to clarify this and not require the developers of the site to provide it in full. The Surrey Canal Triangle SPD (2020) acknowledges this by requiring the following: “Improved public access into the site from South Bermondsey Station to the North;” and “A key north south diagonal pedestrian link across the site should be provided connecting the new Surrey Canal Station, through to a new stadium plaza and onto Bolina in the north-west of the site.”</p> <p>The Development Guidelines at paragraph 15.65 (2) should be amended in this regard to meet the tests of soundness with particular regard to deliverability and consistency with adopted policy.</p> <p>We are very happy to liaise with you further in relation to the above representations as part of the evolution of the Local Plan and in particular, we would be pleased to be invited to participate directly in the Examination in Public in due course.</p> <p>It has not been possible to access the Representation Form on the website although there is an explanation that the council is currently experiencing technical problems in this regard. We thus make this statement of our willingness to be involved as the plan moves towards adoption in this letter.</p>	<p>The Council notes the comments and suggestions made in relation to the new Local Plan Policy LNA SA 09 Surrey Canal Triangle Mixed-use Employment Location.</p> <p>The matters of detail identified in the representation are useful but are not, on balance, considered necessary to ensure soundness.</p> <p>However, the comment that the site cannot reasonably be required to delivery of off-site transport infrastructure (Cycleway 10) in its entirety is acknowledged. The Council could consider an amendment to the wording at Paragraph 15.64 6 through the modifications process. Subject to this amendment the policy is considered sound.</p>	<p>It is suggested that the Council consider amendments to Paragraph 15.64, which can be brought forward through the modifications process –</p> <p><i>“Paragraph 15.64 6. The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area, with enhanced walking and cycle connections between public spaces and the site’s surrounding neighbourhoods. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors. The site must also contribute towards facilitate the delivery of Cycleway 10.”</i></p>
CON052	REP275	Knight Frank			3	LSA SA 02	Representations to Regulation 19 Proposed Submission Document Consultation of the Lewisham Local Plan Review.	The Council notes the comments made in relation to the new Local Plan, specifically	No further action required in relation to the new Local Plan.

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		OBO John Lyon's Charity					<p>On behalf of John Lyon's Charity (hereinafter 'our Client'), Knight Frank hereby submit representations in respect of the Regulation 19 Consultation on the Lewisham Local Plan Proposed Submission Document (hereinafter 'the Lewisham Local Plan'), which is running from 1st March 2023 to 25th April 2023.</p> <p>The London Borough of Lewisham (hereinafter 'LBL') commenced a review of the current Lewisham Local Plan in late 2015, with a consultation on the 'main issues'. LBL subsequently undertook a Regulation 18 Consultation on the Lewisham Local Plan: Main Issues and Preferred Approaches document which ran from January to April 2021. It is intended that once the current Regulation 19 Consultation on the Lewisham Local Plan closes, the Lewisham Local Plan will be submitted for Examination in Public by a Planning Inspector to be appointed by the Secretary of State. If adopted, the Lewisham Local Plan will form the basis of the London Borough of Lewisham's Development Plan, and guide development within the borough during the plan period.</p> <p>Our Client have a land interest within the borough, namely the ownership of 'Trade City', Spine Road, London, SE26 4PU (hereinafter 'the Site'), which will be affected by those policies and allocations contained within the Lewisham Local Plan.</p> <p>Our Client welcomes the Council's preparation of the Lewisham Local Plan, and broadly supports those strategic objectives of the Lewisham Local Plan, namely; the delivery of 'good growth' and directing new development on previously developed land.</p> <p>Nonetheless, our Client has concerns with the 'soundness' of the Lewisham Local Plan; namely the Council's approach to the future redevelopment of the 'Bell Green Retail Park' and wider Bell Green and Lower Sydenham. Our Client contends that in its current form, the site allocation for 'Bell Green Retail Park' and wider objectives for Bell Green and Lower Sydenham do not represent the most appropriate strategy for the delivery of the Council's aspirations for redevelopment. Our Client therefore proposes amendments to the Lewisham Local Plan if it is to be found 'sound'.</p> <p>The Site 'Trade City' is a purpose-built industrial, warehouse and trade counter development, which currently comprises 5,102sq.m of floorspace. The Site is situated immediately to the west of the Bell Green Retail Park, and is bound by a 'green</p>	<p>in relation to Policies LSA 03 Bell Green and Lower Sydenham and LSA SA 02 Bell Green Retail Park.</p> <p>Bell Green and Lower Sydenham The broad level of support offered in relation to the new Local Plan Policy LSA 03 Bell Green and Lower Sydenham is noted and welcomed.</p> <p>The comments made in relation to the requirement for a supplementary master plan to cover the wider Bell Green and Lower Sydenham area are noted. The suggestion that this requirement is unsound as it may render the new Local Plan ineffective is also noted and discounted.</p> <p>The preparation and production of a supplementary master plan to cover the wider Bell Green and Lower Sydenham area has been identified through consultation with local communities. A supplementary planning document of this nature does not by itself invalidate or prejudice site specific master planning or design led approaches – such as those that will be required for the site allocations located with this part of the Borough.</p> <p>For clarity, it is highlighted that the new Local Plan Policy LSA 03 does not prejudice the delivery of site allocations located within the wider Bell Green and Lower Sydenham area. There is no suggestion that proposals coming forward in advance of such a document will be prevented from doing so on the grounds of prematurity. Indeed, the Council suggests that the timely delivery of site allocations, and where they are sought their associated masterplans, will be mutually beneficial. Consequently, the Council considers that the policy is sound.</p> <p>Land Use and Indicative Capacity</p>	

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							<p>buffer’ on the north, east, and south. There are residential uses beyond the ‘green buffer’ to the north, while Pool River lies to the east. The Site, which extends to approximately 1.4ha, forms part of the wider ‘Bell Green Retail Park’ site allocation under the provisions of the Regulation 19 Proposed Submission Document.</p> <p>The ‘Bell Green Retail Park’ site allocation is bound by the ‘Former Bell Green Gas Holders and Livesey Memorial Hall’ site allocation to the west, and the ‘Sainsbury’s Bell Green’ site allocation to the south. ‘Stanton Square Locally Significant Industrial Site’ and ‘Sydenham Green Group Practice’ site allocations are also in close proximity to the south-west of the Site. The Site, and the wider ‘Bell Green Retail Park’ site allocation fall within ‘Bell Green and Lower Sydenham’, which the Council identify for targeted for comprehensive regeneration under the provisions of the Regulation 19 Proposed Submission Document.</p> <p>When adopted, the new Lewisham Local Plan will shape the future of the borough and the regeneration of the Site and the wider area. Our Client therefore wishes to ensure that the Lewisham Local Plan is robust, flexible, and capable of responding to future economic and demographic changes. It is in this context that our Client submits these representations to the Regulation 19 Consultation on the Lewisham Local Plan Proposed Submission Document.</p> <p>Test of ‘Soundness’ Paragraph 35 of the National Planning Policy Framework (hereinafter ‘NPPF’) states that local plans should be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are ‘sound’. Plans are considered to be ‘sound’ if they are:</p> <ul style="list-style-type: none"> • Positively prepared – seeking to meet objectively assessed needs, including unmet needs from neighbouring areas where it is practical to do so; • Justified – an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence; • Effective – deliverable over its period and based on effective joint working on cross-boundary strategic matters; and • Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework. If the Lewisham Local Plan Proposed Submission Document fails to accord with any of the above requirements, it is incapable of complying with the NPPF, which under Section 19 of the Planning and Compulsory Act 2004, is a legal requirement. 	<p>Comments made in relation to the site allocations possible development capacities are noted. Within this context the Council highlights that the new Local Plan must be read and considered in its entirety. The new Local Plan site allocations identify indicative development capacities – the emphasis being upon the word “indicative”. The capacity figures identified within the new Local Plan are very much a starting point on a journey to identifying and securing optimal development capacities.</p> <p>In turn, the development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>The Council concludes that the new Local Plan’s master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p> <p>The comment that the new Local Plan’s approach towards optimal site development capacity fails to apply a detailed design-led methodology is noted and discounted. The Council considers that the application of new Local Plan’s approaches towards optimising</p>	

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							<p>Bell Green and Lower Sydenham</p> <p>The 'Bell Green Retail Park' site allocation falls within 'Lewisham's South Area', which the Council identify as a key regeneration area. More specifically Bell Green and Lower Sydenham are identified within 'Lewisham's South Area' as being areas for growth and regeneration.</p> <p>The regeneration of brownfield sites within Bell Green and Lower Sydenham are expected to deliver a significant amount of new housing, including a high proportion of genuinely affordable housing, workspace and jobs, community facilities and open space. Reflecting their aspirations for Bell Green and Lower Sydenham to be areas for growth and regeneration, the Council hope to 'coordinate new investment in the Bell Green and Lower Sydenham area to enable it to become a London Plan Opportunity Area in a future update to the London Plan'.</p> <p>In this context the Council aim to deliver the regeneration of the former gasholders, Bell Green Retail Park and other sites nearby to create a new high quality residential-led mixed-use area, with a new Local Centre, that is well integrated with existing neighbourhoods and communities.</p> <p>Our Client welcomes the identification of the 'Lewisham's South Area' and Bell Green and Lower Sydenham as a 'Strategic Area for Regeneration', and the Council's support for the further designation of Bell Green and Lower Sydenham as an Opportunity Area within a future review of the London Plan. However, our Client expresses concerns with the Council's intention to 'prepare a Supplementary Planning Document and/or Masterplan through consultation with the local community' within Policy LSA3 (Bell Green and Lower Sydenham) in addition to the requirement within the 'Bell Green Retail Park' site allocation to prepare a 'master plan for comprehensive redevelopment of the former Bell Green gas holders, Bell Green Retail Park and Sainsbury's Bell Green'. It is contended that the proposed Supplementary Planning Document and/or Masterplan for Bell Green and Lower Sydenham is unnecessary given the key sites within Bell Green and Lower Sydenham (including the Bell Green Retail Park) are also subject to site allocations, the delivery of which are in turn required to be informed by a joint masterplan.</p> <p>In this context the requirement for the preparation of a Supplementary Planning Document and/or Masterplan for Bell Green and Lower Sydenham is considered to be unnecessary, and would represent a duplication of the masterplan required</p>	<p>development capacity, and either meeting or exceeding indicative capacities remains sound. The new Local Plan's approaches to this matter provide the Council and its development partners with a robust and transparent mechanism for meeting this objective. In contrast applying a detailed design-led approach to site allocations at the plan-making process is excessively detailed, premature, and potentially over-proscriptive – the latter potentially arbitrarily limiting potential.</p> <p>The comments made in relation to the fragmented landownership and the possible constraints that this poses to the optimised comprehensive redevelopment of the site allocation.</p> <p>The new Local Plan Policy LSA SA 02 seeks to secure a comprehensive redevelopment of this site allocation. It is not unusual for previously developed sites located in urban areas to be in multiple landownerships. This is never in itself a constraint to comprehensive development. The development process remains the appropriate platform for this matter to be resolved in detail. The policy, in conjunction with the new Local Plan Policy DM3, provides effective mechanism to do so. The Council considers that the policy remains sound.</p> <p>Employment and Town Centre Uses</p> <p>The broadly supportive comments made in relation to the comprehensive redevelopment of the site for employment uses and main town centre uses is noted and welcomed. The suggestion that the new Local Plan Policy LSA SA 02 be amended to included further detail that specifies the precise employment uses to be delivered across the site allocation is noted. The Council considers that it is appropriate that the market identifies the specific employment uses to be delivered across this site – being guided by the new</p>	

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							<p>for the site allocations. This duplication is considered to risk the timely delivery of the Council's aspirations for the regeneration of Bell Green and Lower Sydenham and the site allocations specifically within the plan period, and therefore our Client contends that the Lewisham Local Plan as currently drafted is not 'effective' and is therefore 'unsound'.</p> <p>Bell Green Retail Park Under the provisions of the Lewisham Local Plan Proposed Submission Document together with the neighbouring Bell Green Retail Park the Site forms the 'Bell Green Retail Park' site allocation. The Site represents the eastern part of the wider 'Bell Green Retail Park' site allocation, which extends to approximately 7.37ha.</p> <p>While our Client welcomes the allocation of the Site for comprehensive redevelopment, they express the following concerns with the proposed 'Bell Green Retail Park' site allocation.</p> <p>Land Use and Indicative Capacity The 'Bell Green Retail Park' is allocated within the Lewisham Local Plan Proposed Submission Document for the comprehensive mixed-use redevelopment of the existing out-of-centre retail park, to provide compatible residential, commercial, main town centre and community uses. The site allocation includes an indicative development capacity of between 748-1,831 net residential units, 3,740sq.m of employment floorspace, and 14,961sq.m of main town centre uses.</p> <p>While our Client acknowledges the need to include an indicative development capacity within the site allocation, they note that the proposed site allocation allows for a significant range of development capacity. As such our Client contends that any forthcoming development within the site allocation should not be limited to indicative development capacity included within the site allocation. Indeed, it is assumed that the indicative development capacity range is a result of the absence of detailed design scrutiny in support of the allocation, and that the appropriate range of land uses has not been identified as a result of a design-led approach.</p> <p>In this context it is important to ensure that any forthcoming development proposals within the site allocation follows a design-led approach, through which the true development capacity shall be identified, and that this design-led approach should take precedent over the purely indicative site capacity as set out within the site allocation.</p>	<p>Local Plan's spatial strategy and employment focussed planning policies. Such an approach provides development partners with an opportunity to inform decision-taking utilising current market signals. The Council considers this approach sound.</p> <p>Landowner Partnership and Masterplan Requirement The further comments made in relation to this matter are noted. The Council reiterates that it is not unusual for site allocations to be in multiple landownership and that consequently it is reasonable that plan-making and decision-taking processes require landowning interests to enter partnerships. It is unclear to the Council as to why landowners should not seek to enter partnerships that are mutually beneficial to their interests. Furthermore, the Council notes that the respondent has not set out any evidence that demonstrates why this approach will not work at this site allocation. For these reasons the Council considers that the policy remains sound.</p> <p>Tall Buildings The Council notes the comments made and broad level of support offered in relation to the new Local Plan's approach towards building height; as set out in detail under new Local Plan Policy QD 04 Building Heights and in relation to the site allocation at Policy LSA SA 02 Bell Green Retail Park Paragraph 17.22 7.</p> <p>The Council considers that the approach set out under new Local Plan Policy QD 04 is sound – being based on a comprehensive and robust evidence base that is effective in delivering new growth through higher intensity redevelopment of appropriate locations across the Borough. Furthermore, the Council highlights that the new Local Plan's approach towards master planning redevelopment of the site</p>	

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							<p>Furthermore, the indicative development capacity does not acknowledge that the site allocation comprises separate landownerships, and that the delivery of these separate landownerships may not be aligned in respect of their timing or development objectives. It is therefore imperative that the indicative development capacity, and proposed land uses, are applied flexibly.</p> <p>Our Client therefore recommends that the redevelopment of the Site, and wider ‘Bell Green Retail Park’, would be best achieved through a design-led approach. A design-led approach would ensure that the actual development capacity, and appropriate land uses, are secured through the development management process, with evidence that all reasonable development options have been tested, and that the appropriate strategy for the redevelopment of the site allocation has been secured.</p> <p>The site allocation also includes for the provision of 3,750sq.m of employment floorspace. Our Client supports the inclusion of employment floorspace within any proposals for redevelopment within the site allocation, and acknowledges the important role that a mix of uses will perform in creating a sustainable community. It is particularly noted that the site allocation currently comprises employment uses.</p> <p>However, detail on the nature of the suitable employment uses is not provided within the site allocation. Our Client therefore requests further clarification as to those types of employment uses that would be supported within the site allocation.</p> <p>The site allocation also includes for 14,961sq.m town centre uses. As with the proposed employment uses the site allocation does not currently provide any further detail on the nature of those town centre uses expected by the Council.</p> <p>Again, our Client supports the inclusion of town centre uses within the site allocation, and welcomes the provisions of Policy EC12 (Town centre network and hierarchy) which acknowledges that the provision of main town centre uses outside of Lewisham’s existing centres is appropriate where provision has been made within the site allocation.</p> <p>Overall, the Client supports the Council’s aspirations for the redevelopment of ‘Bell Green Retail Park’ for mixed-use redevelopment and welcomes the Council’s aspirations for the</p>	<p>allocations – as set out under new Local Plan Policy DM 03 Masterplans and comprehensive development provides an appropriate and sound mechanism for development industry partners to bring forward proposals incorporating taller buildings for consideration through the development management process. The Council considers that this is a sound approach that allows for the positive consideration of taller buildings subject to supporting technical evidence. For these reasons, the Council maintains that the new Local Plan is sound.</p>	

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							<p>regeneration of the wider area through the redevelopment of the Bell Green Retail Park.</p> <p>However our Client requests that the site allocation is amendment to allow greater flexibility in terms of the overall development capacity, as well as those suitable land uses.</p> <p>Landowner Partnership and Masterplan Requirement While our Client welcomes the allocation of the Bell Green Retail Park, and broadly supports the Council's aspirations for the redevelopment of the 'Bell Green Retail Park' (as above), our Client raises significant concerns regarding the deliverability of the 'Bell Green Retail Park' site allocation in context of the multiple landownerships.</p> <p>Our Client therefore seeks reassurances that the site allocation can be delivered in the context of the multiple landownerships, and that any proposals for the development of part of the site allocation could be supported in the event that it is demonstrated that these would not prejudice the delivery of the remainder of the site allocation.</p> <p>In this context it is noted that the development requirements associated with the site allocation currently state that 'Landowners must work in partnership and in accordance with a master plan for the Bell Green and Lower Sydenham area including a site masterplan, to ensure the appropriate co-location, phasing and balance of uses across the site, in line with DM3 (Masterplans and comprehensive development).'</p> <p>As previously noted, our Client is concerned that the requirement for the masterplan for the Bell Green and Lower Sydenham area represents a duplication of the requirement for the preparation of a separate masterplan for the Bell Green Retail Park site allocation itself. Indeed, it is contended that the current site allocation wording is onerous in that it requires landowners to work in partnership and in accordance with a master plan for Bell Green and Lower Sydenham and in accordance with a masterplan for the 'Bell Green Retail Park'.</p> <p>The requirement to prepare masterplans refers to Policy DM3, which requires masterplans to comprise of: an assessment of the site and its context; a detailed site-wide masterplan that responds positively to the spatial strategy for the borough, site specific development principles and guidelines, and other relevant planning policies; and a delivery strategy that identifies how the development will be implemented and managed over its lifetime.</p>		

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							<p>Our Client acknowledges that the redevelopment of the 'Bell Green Retail Park' would be best achieved through a designed approach that ensures 'the appropriate co-location, phasing and balance of uses across the site'. However, it is contended that this requirement could be achieved through the preparation of a single masterplan developed between the landowners within the 'Bell Green Retail Park' alone, and does not necessitate a separate masterplan for the wider Bell Green and Lower Sydenham.</p> <p>The Client acknowledges that it is necessary to consider the surrounding context and take account of emerging development when (re)developing a site, however policy already requires emerging development to do so, without requiring 'partnerships' between landowners. For example, Policy QD1 (Delivering high quality design in Lewisham) Part C(b) states that development proposals must be designed to address the prevailing or emerging form of development.</p> <p>Our Client contends, therefore, that it is arguably more efficient to allow parcels of land within the site allocation to come forward independently whilst ensuring proposals are compatible and overall cohesion is maintained. Given the 'Bell Green Retail Park' site allocation comprises different landownerships, the site allocation must ensure that the development of one part of the allocation does not prejudice the development potential of another part of the allocation.</p> <p>The conclusions of a design-led process, which accounts for neighbouring land parcels should therefore take precedent over the indicative development capacity for the site allocation as a whole, which has not given detailed consideration to the separate landownerships across the site allocation. Overall, it is contended that phased redevelopment of the 'Bell Green Retail Park' could be adequately satisfied through a development management process, supported by a requirement for proposals not to prejudice the delivery of the remainder of the site allocation. While imposing the requirement for the preparation of a Supplementary Planning Document and/or masterplan for the wider Bell Green and Lower Sydenham is unnecessary given the detail which can be secured through the site allocation itself and subsequent planning application process. The requirement for the preparation (and adoption) of a Supplementary Planning Document and/or masterplan would likely result in significant delays to the delivery of Council's aspirations for the 'Bell Green Retail Park' and wider area. In this context, it is</p>		

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							<p>contended that the site allocation does not currently accord with the requirements of Paragraph 35 of the NPPF in that it is neither justified nor effective.</p> <p>Overall, it is contended that the site allocation for 'Bell Green Retail Park' must acknowledge the multiple landownerships within the site allocation and, facilitate the phased redevelopment of the site allocation while ensuring that the redevelopment of part of the site allocation does not prejudice the delivery of the remainder of the site allocation.</p> <p>Tall Buildings The 'Bell Green Retail Park' site allocation is identified as an area considered to be appropriate for tall buildings, in line with Policy QD4 (Building heights).</p> <p>Policy QD4, Part C(g) sets the threshold of normal maximum heights in the Lower Sydenham / Bell Green proposed opportunity area to be 12-16 storeys. Figure 5.10 'Bell Green / Lower Sydenham tall building suitability zone' confirms the maximum threshold for the Site is 16 storeys. It is acknowledged that the proposed building heights have been amended since the September 2022 version of the Regulation 19 Proposed Submission Document, which included normal maximum heights of 12-20 storeys. It is understood that the analysis contained within the Tall Building Review Background Paper (2023) informed the amendments to the 'normal maximum heights', with the analysis applying an 'additional level of scrutiny' to that utilised by the earlier Allies and Morrison in the 2022 Tall Building Study Addendum.</p> <p>While the identification of the Site as falling within an area considered to be appropriate for tall buildings is welcomed, including an indicative building height range should not prejudice development coming forward at the upper limits of this range where it has been demonstrated that a site can accommodate such heights.</p> <p>The Client suggests that additional text is provided to ensure the Policy is suitably flexible and allows proposals to utilise the design-led approach to optimise site capacity.</p>		
CON052	REP276	<p>Knight Frank</p> <p>OBO</p> <p>John Lyon's Charity</p>			3	LSA SA 02	<p>Conclusion John Lyon's Charity welcome the preparation of the new Lewisham Local Plan, and broadly support the Council's aspirations for the regeneration of Bell Green and Lower Sydenham, including the 'Bell Green Retail Park' site allocation.</p> <p>However, our Client raises concerns about the deliverability of the current site allocation as currently worded. Our Client</p>	The Council notes the comments made in relation to the new Local Plan, specifically in relation to Policies LSA 03 Bell Green and Lower Sydenham and LSA SA 02 Bell Green Retail Park.	No further action required in relation to the new Local Plan.

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							<p>therefore requests amendments to the site allocation, and corresponding policies, to ensure the site allocation can be delivered in a timely and effective manner.</p> <p>Overall, it is considered that in its current form the draft Local Plan would not be legally compliant, and it is suggested that the Council undertake further review. We look forward to engaging further in the preparation of the Lewisham Local Plan, and the opportunity to make further representations to the Lewisham Local Plan, and the Examination in Public.</p>	The Council notes the broad level of support provided to elements of both policies and the stated objection to certain detailed policy requirements.	
CON053	REP277	WSP OBO Sainsbury's Supermarke ts Ltd			3	<p>LNA SA 11</p> <p>LSA SA 03</p> <p>Introduction</p>	<p>On behalf of our client, Sainsbury's Supermarkets Ltd (SSL), we make this submission in response to the current consultation in respect of the draft Local Plan (Regulation 19).</p> <p>Sainsbury's occupy two large stores in Lewisham at Lee Green and at Bell Green (Sydenham). Both of these stores have been allocated within the draft Local Plan for redevelopment. Whilst we support the aspiration to provide housing, both allocations lack clarity as to whether a store of the same size as existing will be re-provided on the site, and whether continuity of trade will be ensured during the construction phase.</p> <p>The existing Sainsbury's stores are essential for the vitality and viability of Lee Green and Bell Green. SSL are a major employer and the disruption caused by development, particularly if continuity of trade is not ensured and/or if a significantly smaller store is proposed, would have a significant negative impact on Sainsbury's business, the colleagues currently employed on site and the local community who rely on Sainsbury's for their grocery shopping.</p> <p>The Sainsbury's stores at Lee Green and Sainsbury's Bell Green currently trade very well, with many shoppers visiting the store either on foot, by bicycle or by car. Sainsbury's Lee Green has over 30,000 transactions (excluding online sales) in store every week and the Bell Green store has more than 45,000 transactions. These are high numbers of physical visits. Many of these shoppers link their trip with a visit to other nearby facilities in the area.</p> <p>In summary, if the redevelopment of the two allocations go ahead without making reference the reprovision of an equivalent Sainsbury's foodstore and appropriate car parking, there will be a serious reduction in the accessibility to essential grocery needs for the local community, a disastrous loss of jobs which will largely be felt by local residents, the growth of unsustainable shopping patterns, and potentially adverse</p>	<p>The Council notes the introductory comments made in relation to the new Local Plan Policy LNA SA 11 Former Hatcham Works, New Cross Road and Policy LSA SA 03 Sainsbury's Bell Green. The Council also notes and welcomes the broad level of support offered in relation to the site allocations (relating to sites operated by Sainsbury's Supermarkets Ltd). The Council notes the respondent's willingness to accommodate a mixed-use redevelopment, incorporating residential uses, on the sites.</p> <p>The Council notes the comment that operational continuity, for existing on-site uses, is a desirable component for comprehensive site redevelopment. The Council suggests that this matter does not invalidate the soundness of the site allocation. This is a normal consideration for many developments involving occupied previously developed sites. Equally this would be an issue, for existing site occupiers, during building maintenance works. The Council notes the example of the Catford Tesco, which has recently undergone significant maintenance/ refurbishment. The Council will seek to work with existing commercial occupiers to ensure that their operational needs are met during comprehensive redevelopment.</p> <p>The Council notes and acknowledges the comment that supermarkets make a positive contribution towards the continued vitality and viability of retail</p>	No further action required in relation to the new Local Plan.

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							<p>highways impacts as demand and trips are diverted to more distant stores.</p> <p>We have also reviewed the policy wording of the draft Local Plan and make a number of suggestions below. These representations are structured as follows:</p> <ul style="list-style-type: none"> ▪ Emerging Policies – General SSL comments on a number of pertinent policies; and ▪ Emerging Allocations – SSL comments on the Lee Green and Bell Green allocations specifically. 	<p>centres – that is subject to those supermarkets being in accessible and/ or central locations (within their respective retail centre).</p> <p>Finally, the suggestion that the policy be amended to specify the like-for-like replacement of the existing supermarket – in terms of retail trading floorspace and parking provision – is noted. The Council considers that this approach could be unsound. Highstreet retail continues to be subject to structural change. For example, there is a clear discernible shift towards the transformation of large floorspace supermarkets to a mix of retail floorspace use and e-tailing warehouse hub distribution. Consequently, amending the policy to proscriptively require a like-for-like replacement may be redundant – this is true in terms of the scale of retail floorspace and parking provision. Equally, the continued evolution of car ownership and usage suggests that current levels of parking provision will be excessive. For these reasons, the Council maintains that the policy remains sound.</p>	
CON053	REP278	WSP OBO Sainsbury's Supermarke ts Ltd			2	SD 02	<p>Emerging Policies</p> <p>POLICY SD2 SUSTAINABLE DESIGN AND RETROFITTING</p> <p>Policy SD2 states that development proposals for major non-residential refurbishment, including mixed use development, will be required to achieve a certified 'Excellent' rating. In our experience it is extremely difficult to achieve an Excellent rating when assessing 'Shell only' commercial units.</p> <p>When you assess the 'Shell only' there are large number of credits that are not available, mainly due to the required assessment credits not necessarily being specified (M&E for performance, commissioning and monitoring for example). We request an amendment to the policy wording that states that (red means new wording):</p> <p>"development should achieve BREEAM very good for 'Shell only' commercial developments, with best endeavours to reach excellent target for Fit out"</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy SD 02 Sustainable Design and Retrofitting – specifically in terms of new non-residential developments being required to achieve BREEAM excellent rating.</p> <p>For clarity, the new Local Plan Policy SD 02 requires –</p> <p><i>"Proposals for new non-residential development of 500 square metres gross floorspace or more, including mixed-use development, must achieve an 'Excellent' rating under the BREEAM New Construction (Non-Domestic Buildings) 2018 scheme, or future equivalent, unless it can be demonstrated that this is not feasible."</i></p>	No further action required in relation to the new Local Plan.

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								The Council considers that the policy wording is sufficiently flexible to provide development partners to demonstrate through evidence that it is unfeasible to achieve a BREEAM excellent rating. For this reason, the Council considers the policy sound.	
CON053	REP279	WSP OBO Sainsbury's Supermarke ts Ltd			2	QD 01	<p>POLICY QD1 DELIVERING HIGH QUALITY DESIGN IN LEWISHAM</p> <p>Policy QD1 states that development proposals must be designed to address (red means new wording):</p> <ul style="list-style-type: none"> a. Natural features including trees, landscape, topography, open spaces and waterways; b. The prevailing or emerging form of development (including urban grain, building typology, morphology and the hierarchy of streets, routes and other spaces); c. The proportion of development (including height, scale, mass and bulk) within the site, its immediate vicinity and the surrounding area; d. Building lines along with the orientation of and spacing between buildings; e. Strategic and local views, vistas and landmarks; f. Townscape features; g. The significance of heritage assets and their setting; h. Architectural styles, detailing and materials that contribute to local character; and i. Cultural assets. <p>It is considered that meeting these design criteria although aspirational, is not always achievable due to site constraints, therefore some flexibility needs to be applied in these circumstances. We would advise that an exceptions criterion is inserted into the policy such as:</p> <p>"It is acknowledged that meeting this design criteria is not always achievable due to site constraints and this should be negotiated on a site-by-site basis"</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 01 Delivering high quality design in Lewisham.</p> <p>For clarity, the new Local Plan Policy QD 01 states –</p> <p><i>"To successfully respond to local distinctiveness development proposals must be designed to address: ..."</i></p> <p>It is unclear from the representation why it is not possible for development proposals to be unresponsive, in their design, to these specific matters. The Council acknowledges that there will site-specific constraints that will influence/ inform the design of new development – indeed, some of these "constraints" may be included within the listed matters. Nevertheless, site specific constraints do not preclude the design of new developments from successfully responding to local distinctiveness.</p> <p>Furthermore, the Council considers that the new Local Plan is sufficiently flexible to provide development partners with the opportunity, as part of the subsequent decision-taking process, to evidentially demonstrate site specific matters. For these reasons, the Council maintains that the policy is sound.</p>	No further action required in relation to the new Local Plan.
CON053	REP280	WSP OBO Sainsbury's Supermarke ts Ltd			2	GR 03	<p>POLICY GR3 BIODIVERSITY AND ACCESS TO NATURE</p> <p>Policy GR3 states that 'Development proposals should seek to secure Biodiversity Net Gain. The BNG benchmark is a minimum 10 per cent increase in habitat value for wildlife compared with the pre-development baseline, calculated using an appropriate Biodiversity Metric.'</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy GR3 Biodiversity and Access to Nature. The suggested amendments to the policy wording are noted and discounted.</p> <p>The Council challenges the suggestion that the policy is aspirational but not always</p>	No further action required in relation to the new Local Plan.

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							<p>It is noted that this policy although aspirational, is not always achievable due to site constraints, therefore some flexibility needs to be applied in these exceptional circumstances. Page 3 BNG will become a statutory requirement from November 2023 and will be introduced through the Environment Act 2021. The 'Understanding biodiversity net gain' Government Guidance document recognises that it is not always feasible to provide a net gain on-site and/or off-site. The Guidance confirms that if on-site or off-site land cannot be used, statutory credits can be purchased from the government as an alternative.</p> <p>The following wording could be accommodated to ensure that Policy GR3 is consistent with national objectives (red means new wording).</p> <p>"It is acknowledged that providing Biodiversity Net Gain on-site and/or off-site is not always achievable and if this cannot be accommodated then statutory credits must be sought"</p>	<p>achievable. For clarity, it is highlighted that Biodiversity Net Gain is a concept enshrined in law and was anticipated to become a requirement in decision-taking from November 2023. It is understood that whilst this has been delayed, the Government remains committed to its introduction. Consequently, whether delivered on-site, off-site or as a financial contribution, new development will secure at least 10% Biodiversity Net Gain.</p> <p>For further clarity, supporting text Paragraph 10.19 provides further guidance that states –</p> <p><i>"The Environment Act 2021 introduces provisions for Biodiversity Net Gain. The mandatory requirement for BNG on qualifying developments will apply in England and are to be brought into force through future amendments to the Town and Country Planning Act106. To ensure the alignment with the new legislative framework the Local Plan seeks that development proposals secure BNG. The BNG benchmark is a minimum 10 per cent increase in habitat value for wildlife compared with the pre-development baseline, calculated using an appropriate Biodiversity Metric107. The Lewisham Local Plan Viability Assessment (2022) indicates that this requirement will have a negligible impact on development viability108. Policy GR3.E will be used as a guide until such time further legislation and national policy take effect. BNG should normally be delivered on-site. However, flexibility may be applied on a case-by-case basis where it is demonstrated that on-site provision is not feasible or off-site contributions will provide greater biodiversity benefits, for example, by contributing to the restoration or recovery of habitats within sites or areas identified in a LNRS or other similar document. Development proposals should refer to good practice guidance such as the British</i></p>	

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								<p><i>Standard BS 8683:2021 Process for designing and implementing Biodiversity Net Gain."</i></p> <p>For these reasons, the Council maintains that the policy is sound.</p>	
CON053	REP281 a and b	WSP OBO Sainsbury's Supermarke ts Ltd			3	LNA SA 11 LSA SA 03	<p>Emerging Allocations</p> <p>THE NEED FOR A REPLACEMENT FOODSTORE</p> <p>The existing Sainsbury's stores provide an essential grocery offer at Lee Green and Bell Green and there is an opportunity for them to perform a crucial anchor role in the redevelopment of these two sites. Inclusion of a new foodstore will create activity and focus to the residential components of these sites. Sainsbury's have a proven track record of delivering high-quality mixed-use redevelopment in London. For example, at their Hendon store where they have partnered with an experienced housebuilder to provide 1,300 new homes, a new Sainsbury's store and other business floorspace as well as high quality public realm.</p> <p>The Sainsbury's Lee Green store is currently allocated for 111 net residential units, 625sqm of employment floorspace and 4,123sqm of town centre uses The Sainsbury's Bell Green store is allocated for 550 – 1,347 residential units, 2,751 sqm of employment floorspace and 11,003 sqm of town centre uses.</p> <p>Although there is a general statement that 'compatible main town centre' uses are also appropriate, and that redevelopment should allow for the re-provision of a supermarket, no specific reference is made to re-providing the Sainsbury's foodstore of the same size as existing stores on site.</p> <p>Policy EC8 seeks to prevent the net loss of viable industrial capacity on non-designated employment sites because their important role in the local economy and in creating job opportunities.</p> <p>The two Sainsbury's stores provide over 500 jobs on site and these jobs should be as highly valued as jobs in other employment sectors. Not only will the job losses impact on the local economy, but not re-providing a store of equivalent size will impact upon the vitality and viability of the Lee Green District Centre and the Bell Green Retail Park. In short, whilst Sainsbury's support the redevelopment aspirations of their Lee Green and Bell Green sites, it is not clear as to whether a 'foodstore' of an equivalent size with appropriate car parking provision will be re-provided as part of the vision for the area.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 11 Former Hatcham Works, New Cross Road and Policy LSA SA 03 Sainsbury's Bell Green. The Council also notes and welcomes the broad level of support offered in relation to the site allocations (relating to sites operated by Sainsbury's Supermarkets Ltd). The Council notes the respondent's willingness to accommodate a mixed-use redevelopment, incorporating residential uses, on the sites.</p> <p>Reprovision of Foodstore</p> <p>The Council notes the comment that operational continuity, for existing on-site uses, is a desirable component for comprehensive site redevelopment. The Council suggests that this matter does not invalidate the soundness of the site allocation. This is a normal consideration for many developments involving occupied previously developed sites. Equally this would be an issue, for existing site occupiers, during building maintenance works. The Council notes the example of the Catford Tesco, which has recently undergone significant maintenance/ refurbishment. The Council will seek to work with existing commercial occupiers to ensure that their operational needs are met during comprehensive redevelopment.</p> <p>The Council notes and acknowledges the comment that supermarkets make a positive contribution towards the continued vitality and viability of retail centres – that is subject to those supermarkets being in accessible and/ or central locations (within their respective retail centre).</p>	No further action required in relation to the new Local Plan.

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							<p>There is no doubt that if a foodstore of an equivalent scale to the existing provision, with adequate car parking, and that provision is not made for the continuity of trade during the construction period, the site will not be deliverable.</p> <p>Furthermore, The NPPF is clear in its instruction for the need to boost and maintain the supply of housing, and that it is important that a sufficient amount and variety of land can come forward where needed (Paragraph 76). Making efficient use of land is supported by paragraph 119 in the of the NPPF, in particular promoting development of land where this would help to meet identified needs for housing. Taking this into account, the Sainsbury's Bell Green allocation should be updated to provide a maximum amount of housing rather than the range which is currently proposed.</p> <p>CAR PARKING AND SERVICING It is not clear from the allocation wording whether the Sainsbury's Lee Green and Sainsbury's Bell Green allocations will re-provide the existing level of car parking spaces.</p> <p>Reducing the amount of car parking as a result of the redevelopment of the site will undermine the attractiveness and accessibility the stores. Both existing Sainsbury's stores provide parking for customers and this is particularly beneficial to those with larger families, the less mobile and vulnerable people for whom public transport, cycling or walking is not an option.</p> <p>Any redevelopment also needs to include adequate servicing and operational land to enable future businesses to operate efficiently and without impediment. If the servicing is inadequate, it will make the site unacceptable for the retail and other occupiers.</p> <p>In summary, the allocations should be amended to include specific reference to the re-provision of a foodstore of equivalent size with an appropriate level of adjacent car parking on site, as well as ensuring continuity of trade during the construction period. It is suggested the allocation wording be amended to the following (strikethrough means deletion of word, red means new wording:</p>	<p>The suggestion that the policy be amended to specify the like-for-like replacement of the existing supermarket – in terms of retail trading floorspace and parking provision – is noted. The Council considers that this approach could be unsound. Highstreet retail continues to be subject to structural change. For example, there is a clear discernible shift towards the transformation of large floorspace supermarkets to a mix of retail floorspace use and e-tailing warehouse hub distribution. Consequently, amending the policy to proscriptively require a like-for-like replacement may be redundant – this is true in terms of the scale of retail floorspace and parking provision. Equally, the continued evolution of car ownership and usage suggests that current levels of parking provision will be excessive. For these reasons, the Council maintains that the policy remains sound.</p> <p>Equally, it would be unsound for the policy to specify the re-provision of a use by a particular operator. It is understood that the lifespan of retailers is finite. There are many examples of once successful retail operators coming to the end of their lifespan. This is an inevitability of our economic system. Consequently, it is entirely correct and sound that the policy speaks to main town centre uses, rather than specific operators. It is noted that this approach does not prevent the existing occupier from progressing redevelopment opportunities.</p> <p>Scale of Housing The Council acknowledges that the NPPF does indeed seek to secure a boost in housing supply through plan-making. Within this context the Council has prepared and produced the new Local Plan in accordance with national planning policy.</p>	

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							<div><div>3. SAINSBURY'S BELL GREEN</div><table><tr><td>INDICATIVE DEVELOPMENT CAPACITY</td><td>Net residential units 550 Up to 1,400</td><td>Gross non-residential floorspace Employment 2,751sqm Main town centre 11,003sqm including a foodstore of an appropriate scale with associated car parking and servicing provision. Continuity of trade for the foodstore should be ensured during the construction period</td></tr></table><div>4. SAINSBURY'S LEE GREEN</div><table><tr><td>INDICATIVE DEVELOPMENT CAPACITY</td><td>Net residential units 144 Up to 500</td><td>Gross non-residential floorspace Employment 625sqm Main town centre 4,123sqm including a foodstore of an appropriate scale with associated car parking and servicing provision</td></tr></table><div>Page 4</div><table><tr><td></td><td></td><td>Continuity of trade for the foodstore should be ensured during the construction period</td></tr></table></div> <div>SAFEGUARDED LAND AT BELL GREEN The text supporting the Sainsbury’s Bell Green allocation requires safeguarded land to support the delivery of strategic transport infrastructure, including where required for the Bakerloo line extension [paragraph 17.25.4]. It is important to recognise that a safeguarding Direction has not been confirmed for Phase 2 of the BLE (i.e the phase extending south beyond Lewisham station) [as referenced in paragraph 12.10 of the Plan]. As there is no safeguarded Direction for the BLE at the Bell Green Sainsbury’s store, there is no reason to require new development to safeguard land for the BLE. Therefore, this reference should be removed. It is recommended that paragraph 17.25.4 be amended to the following: <i>"Safeguard land to support delivery of strategic transport infrastructure, including where required for the Bakerloo line extension and consider options for the provision of a new railway station across the Bell Green Masterplan area, in partnership with TFL and Network Rail."</i> Summary In summary, the redevelopment of Sainsbury’s stores at Lee Green and Bell Green as proposed in the emerging Local Plan will have significant implications for Sainsbury’s which must be taken into consideration, and if the Sainsbury’s stores have to close this will lead to very significant job losses which must also be addressed.</div>	INDICATIVE DEVELOPMENT CAPACITY	Net residential units 550 Up to 1,400	Gross non-residential floorspace Employment 2,751sqm Main town centre 11,003sqm including a foodstore of an appropriate scale with associated car parking and servicing provision. Continuity of trade for the foodstore should be ensured during the construction period	INDICATIVE DEVELOPMENT CAPACITY	Net residential units 144 Up to 500	Gross non-residential floorspace Employment 625sqm Main town centre 4,123sqm including a foodstore of an appropriate scale with associated car parking and servicing provision			Continuity of trade for the foodstore should be ensured during the construction period	<div>For clarity, it is noted that the new Local Plan site allocations identify indicative development capacities – for residential and commercial uses. In concert, the new Local Plan also seeks to secure optimal yields through the application of the new Local Plan High Quality Design Policies – for example Policies QD 01 Delivering high quality design in Lewisham, QD 04 Building Heights, and QD 06 Optimising site capacity. Furthermore, the Council considers that the masterplanning/ design led approach (Policy DM 03 Masterplans and comprehensive development) provides development partners with an opportunity to evidentially demonstrate their development’s optimal capacity. For these reasons, the Council maintains that the new Local Plan is sound.</div> <div>Car Parking and Servicing The Council notes the suggestion that the policies be amended to secure a like-for-like replacement car parking provision for a re-provided supermarket. The Council considers this to be an unsound solution. Some of the reasons for this conclusion are set out above. Furthermore, the Council highlights that the Borough is already a highly accessible location – with its existing centres being the most accessible locations, benefiting from access to public, cycle, and pedestrian infrastructure networks. The Council is committed to encouraging the necessary shift towards sustainable travel through its plan-making, infrastructure delivery and decision-taking responsibilities. For these reasons, the Council maintains that the new Local Plan’s approach is sound.</div> <div>Bakerloo Line Extension The Council is committed to supporting its infrastructure partners in securing and delivering the Bakerloo Line Extension. The Council can achieve this objective</div>	
INDICATIVE DEVELOPMENT CAPACITY	Net residential units 550 Up to 1,400	Gross non-residential floorspace Employment 2,751sqm Main town centre 11,003sqm including a foodstore of an appropriate scale with associated car parking and servicing provision. Continuity of trade for the foodstore should be ensured during the construction period																
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							<p>If the allocations do not address Sainsbury's requirements regarding retaining a suitably sized store with appropriate car parking, and with the ability to have continuity of trade, the sites will not be delivered.</p> <p>The Lee Green and Bell Green allocations in the emerging Local Plan should explicitly make provision for a replacement foodstore of an appropriate scale which can continue to act as an anchor for the wider vision of the site, taking into account the need for sufficient car parking and servicing. Reference to a temporary store to allow continuity of trade during the construction period should also be included in each allocation.</p> <p>We hope that these representations will be incorporated in the next iteration of the Plan, and that the Council takes this opportunity to engage constructively with Sainsbury's as a major investor, employer and landowner.</p> <p>We look forward to hearing from you.</p>	<p>through its plan-making and decision-taking responsibilities.</p> <p>The new Local Plan covers a fifteen-year plan-period, and the NPPF signals the need that plan-making take a wider strategic view of growth particularly in relation to infrastructure delivery (pointing to longer thirty-year periods). Within this context the Council considers it entirely correct that the new Local Plan provides all possible development partners with an insight of how growth will be delivered over the life of the plan and conceivably beyond. It is unclear why the respondent would seek an alternative approach. It is equally unclear why the respondent would not wish to support necessary transport infrastructure improvements such as the Bakerloo Line Extension.</p>	
CON053	REP282 a and b	WSP OBO Sainsbury's Supermarke ts Ltd (SSL)				LNA SA 11 LSA SA 03	<p>We write on behalf of Sainsbury's Supermarkets Ltd (SSL) in response to the consultation of the new "Lewisham Local Plan: Proposed Submission Document", under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>SSL owns the Sainsbury's store and petrol filling station at New Cross Gate, as well as the retail warehousing and associated car parking. WSP previously submitted representations, on behalf of SSL in 2021 in response to the Regulation 18 consultation "Lewisham Local Plan: Main Issues and Preferred Approaches".</p> <p>We also met with the council on 27th April 2021 to discuss SSL's Regulation 18 response and we are disappointed that our previous responses do not seem to have influenced the Regulation 19 version of the plan.</p> <p>We have reviewed the Regulation 19 "Lewisham Local Plan: Proposed Submission Document" document and evidence base and have set out our objection and comments below.</p> <p>The Sainsbury's store continues to trade very well, with many shoppers visiting the store either on foot, by bicycle or by car. The store achieves around 1.06million transactions (or visitors) per annum. By 2024, this is estimated to increase to 1.16million transactions per annum. The store generates a gross value added (GVA) of some £8.7million per annum to the</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 11 Former Hatcham Works, New Cross Road and Policy LSA SA 03 Sainsbury's Bell Green. The Council also notes and welcomes the broad level of support offered in relation to the site allocations (relating to sites operated by Sainsbury's Supermarkets Ltd).</p> <p>The Council notes and acknowledges the comment that supermarkets make a positive contribution towards the continued vitality and viability of retail centres – that is subject to those supermarkets being in accessible and/ or central locations (within their respective retail centre).</p> <p>Scale of Housing The Council acknowledges that the NPPF does indeed seek to secure a boost in housing supply through plan-making. Within this context the Council has prepared and produced the new Local Plan in accordance with national planning policy.</p>	<p>No further action required in relation to the new Local Plan.</p> <p>Liaise with Transport for London to ensure that they are fully aware and prepared to respond to the challenge to the Bakerloo Line Extension.</p>

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							<p>local economy. This is a permanent economic benefit which will be enjoyed in perpetuity if the store continues to trade and to employ the same number of staff members. This demonstrates that the Sainsbury's store is a major contributor to Lewisham's economy and that Sainsbury's are a key stakeholder in the Borough.</p> <p>The existing Sainsbury's store is essential for the vitality for New Cross Gate. The current allocation in the New Local Plan as safeguarded land to accommodate the Bakerloo Line Extension (BLE), including a new station would have a significant negative impact on Sainsbury's business, the colleagues currently employed on site, the local economy and the local community who rely on Sainsbury's for their grocery shopping. SSL wholeheartedly object to the current allocation of their store at New Cross Gate and have previously objected to Transport for London's (TfL) consultations on the use of their site for the BLE, including the site's identification as a tunnelling worksite.</p> <p>These representations are included at Appendix 1 & 2 for completeness. The representations to TfL's consultation should be read in conjunction with these representations because they explain why SSL's site is not an appropriate location for a new station and/or a tunnelling workshop.</p> <p>The Allocation for the Site The SSL site, referred to in the new Local Plan as the 'Former Hatcham Works, New Cross Road', is currently allocated for 800 residential units, 7,550sqm of employment floorspace and 10,000sqm of 'main town centre' floorspace. The site is also allocated as the 'Bakerloo Line Safeguarding Direction'. The allocation for 800 residential units is less than the previous iteration the Regulation 18 version of the Plan which allocated the site for 912 residential units.</p> <p>The identified need in both the Regulation 18 and Regulation 19 version of the Plan remains unchanged and states that the LB Lewisham have an identified housing need of 1,667 new dwellings per annum. Therefore, it is unclear as to why the Council has sought to plan for a lower level of residential units. To do so is not positive plan making and is not in accordance with paragraph 8 of the NPPF, to achieve sustainable development, and paragraph 35 of the NPPF which requires plans to be positively prepared.</p> <p>Furthermore, the identification of the site as the 'Former Hatcham Works' site is misleading as it does not reflect the</p>	<p>For clarity, it is noted that the new Local Plan site allocations identify indicative development capacities – for residential and commercial uses. In concert, the new Local Plan also seeks to secure optimal yields through the application of the new Local Plan High Quality Design Policies – for example Policies QD 01 Delivering high quality design in Lewisham, QD 04 Building Heights, and QD 06 Optimising site capacity. Furthermore, the Council considers that the masterplanning/ design led approach (Policy DM 03 Masterplans and comprehensive development) provides development partners with an opportunity to evidentially demonstrate their development's optimal capacity. For these reasons, the Council maintains that the new Local Plan is sound.</p> <p>Bakerloo Line Extension The Council is committed to supporting its infrastructure partners in securing and delivering the Bakerloo Line Extension. The Council can achieve this objective through its plan-making and decision-taking responsibilities.</p> <p>The new Local Plan covers a fifteen-year plan-period, and the NPPF signals the need that plan-making take a wider strategic view of growth particularly in relation to infrastructure delivery (pointing to longer thirty-year periods). Within this context the Council considers it entirely correct that the new Local Plan provides all possible development partners with an insight of how growth will be delivered over the life of the plan and conceivably beyond. It is unclear why the respondent would seek an alternative approach. It is equally unclear why the respondent would not wish to support necessary transport infrastructure improvements such as the Bakerloo Line Extension. The Council concludes that the proposed public transport improvement will secure significant benefits not only for the</p>	

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							<p>current use of the site. The naming of the site appears to be a deliberate attempt to obfuscate the impact of the allocation on the retail use that is fundamental to New Cross/New Cross Gate District Centre. We suggest that the site is renamed to the 'New Cross Gate Retail Park'. For clarity, we refer to the site as New Cross Gate Retail Park in these representations.</p> <p>Our Previous Concerns Are More Pertinent Post Pandemic The concerns which we have expressed to TfL and Lewisham Council have never been addressed. They are legitimate concerns and undermine the soundness of the emerging Local Plan.</p> <p>For ease, we re-state our concerns and objections below. In addition, our concerns that there is no credible business case for the BLE are even more pertinent post the Covid 19 pandemic because travel and working patterns in London have changed significantly which further calls into question the need for the BLE, and TfL's finances are precarious.</p> <p>TfL data (Transport for London Quarterly Performance Report Quarter 3 2022/23 – 18th September – 10th December 2022) suggests that total journeys across the TfL network are down on the pre-covid baseline (2018/19) from 2,787 million to 2,252 million at the time of the report, a decrease of 20% and journeys on the London Underground network are 19% down on the precovid baseline. This reduction in journeys is having an impact on TfL's finances and will impact upon TfL's ability to be able to deliver infrastructure projects such as the BLE.</p> <p>Total passenger income for the year to date up to Q3 2022/23 was £2.9 billion compared to the same period in 2019/20 which generated £3.4 billion in passenger income. The consensus view is that the changes to the way we work, with more home working, and flexible working hours means that working travel patterns will not return to pre-pandemic levels.</p> <p>We raised concerns pre-pandemic, the financing, and the need for the BLE had not been properly considered by TfL. This failing is reinforced further in a post-pandemic world given the trends highlighted by TfL's performance reporting and there is absolutely no evidence that there is a need for the BLE, and no certainty that TfL will be able to finance the BLE in the medium or even the long term. Indeed, it has been well publicised that passenger journeys on the Elizabeth Line are far exceeding expectation, and it is now the 5th busiest railway in the whole of the UK. It is also understood that the Elizabeth Line has</p>	<p>Borough's residents, communities and businesses but also for those across the whole of the Capital.</p> <p>For clarity, the Bakerloo Line Extension is a sustainable transport network improvement being promoted by Transport for London – who will ultimately implement and operate the network. Whilst it is entirely appropriate for the new Local Plan to identify the infrastructure – the new Local Plan is not the schemes parent. The improvement scheme itself is unlikely to be comprehensively tested through the new Local Plan examination.</p>	

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							<p>reduced the demand on other lines, and this further calls into question the need for, and the cost effectiveness of the BLE.</p> <p>In short, pre-pandemic, the justification for the BLE was threadbare and the prospects of it being funded was at best, dubious. In the post-pandemic world, there is simply no justification, and no realistic hope that it will be funded. This is the context in which safeguarding the Sainsbury's site to accommodate the BLE must be viewed. Sainsbury's want to release significant investment and regeneration that will deliver a new foodstore and over 1,000 new homes on the site.</p> <p>If the Council could face into the reality that the BLE will not be delivered in the foreseeable future, if ever, because there is no business case and no need, it could deliver tangible and far-reaching benefits for the local community and New Cross/New Cross Gate District Centre.</p> <p>Bakerloo Line Extension (BLE) The proposed BLE has been promoted by TfL since 2017. The proposals have undergone three rounds of consultation. SSL has submitted representations to each of these consultations (dated April 2017, December 2018 and December 2019).</p> <p>Based on the published consultation information and supporting evidence, SSL strongly objected to the location of the new BLE station at New Cross Gate Retail Park and the use of the site for tunnel launching and as a works site. This objection still stands.</p> <p>SSL is deeply concerned at TfL's lack of genuine consideration of the concerns raised and the rights of Sainsbury's as the landowner and long-standing employer and business within the community. SSL has engaged with TfL at each formal consultation opportunity to identify issues and concerns regarding the BLE plans in respect of New Cross Gate Retail Park.</p> <p>Fundamentally, there is no robust business case for the BLE and that the choice of the New Cross Gate Retail Park for a station and as a tunnelling site will result in adverse impacts on the local community and area. Our previous representations set out further details and were supported by extensive technical evidence.</p> <p>As noted, a copy of our previous representations as well as the supporting technical evidence is enclosed (Appendix 1 & 2). However, in summary:</p>		

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							<ul style="list-style-type: none"> ▪ There is no evidence of a robust and transparent business case for a capital intensive and disruptive infrastructure project such as the BLE. The project should be halted pending the publication of a robust business case; ▪ Since it is acknowledged that the delivery of a station at New Cross Gate Retail Park will force the closure of Sainsbury's store, the location of the station at New Cross Gate must be re-consulted upon. Previous consultations assumed that Sainsbury's could continue to trade; ▪ The selection of New Cross Gate Retail Park as a station and tunnelling worksite location has not been robustly justified and there has not been proper consideration of alternatives which will have less impact; ▪ The selection of New Cross Gate Retail Park as a station and tunnelling worksite has many disadvantages which have not been properly considered or articulated. For example, the closure of the Sainsbury's store will have significant socio-economic consequences for the future of the New Cross/New Cross Gate District Centre which have not been considered; ▪ TfL has not appropriately and robustly considered the consequential impact upon the regeneration/development potential of New Cross Gate Retail Park to provide over 1,000 new homes and a new Sainsbury's foodstore, maintaining the continuity of trading during construction and supporting the vitality and viability of New Cross Gate/New Cross District Centre; ▪ TfL does not appear to have fully considered other potentially viable options for locating New Cross Gate station, closer to the rest of the New Cross/New Cross Gate District Centre, including on the Goodwood Road site; ▪ TfL does not appear to have seriously considered alternative tunnelling worksites to New Cross Gate Retail Park. For example, the Wearside Road Depot is a more appropriate tunnelling worksite; ▪ The impact of the tunnelling worksite on a Site of Importance for Nature Conservation (SINC) has not been assessed; ▪ There is no evidence that a Strategic Environmental Assessment (SEA) has been prepared to holistically evaluate the effects of the BLE proposals on the environment and social, cultural and economic circumstances; and ▪ There is no evidence that TfL has undertaken a robust cost benefit analysis of the BLE proposal, or indeed that there is a robust business case that justifies the significant public expenditure. <p>Safeguarding of the Site for the BLE SSL strongly object to their site being identified as a tunnelling worksite by TfL and the site's selection as the location for New</p>		

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							<p>Cross Gate Station. The allocation of the New Cross Gate Retail Park to accommodate the BLE will have significant and unacceptable consequences for the existing Sainsbury's store, its employees, and the community which it serves.</p> <p>The allocation results in the loss of the regeneration opportunity presented by the site and the loss of any positive impact on the wider New Cross/New Cross Gate District Centre. The extent of this lost opportunity is demonstrated by the joint planning application that SSL submitted with London Property Developers, Mount Anvil in 2019. The planning application sought to deliver 1,161 homes on the site across two phases, as well as a replacement supermarket, commercial space, placemaking and infrastructure. The Council validated the planning application on 24 January 2020 (LPA Ref: DC/19/114283). However, the application was subsequently withdrawn on 27 February 2020 due to the ongoing uncertainty around the BLE which has blighted the site. Despite this, SSL remains committed to delivering new housing and investment immediately if the allocation for a new station and tunnelling worksite is lifted.</p> <p>As a substantial and highly accessible site, with a PTAL rating of 6, New Cross Gate Retail Park offers a valuable regeneration opportunity with excellent potential for contributing to the delivery of much-needed high quality housing. SSL is confident that the site could accommodate more housing than the allocation proposes, given its experience elsewhere where densities more than 350 units per hectare have been achieved on sites with a lower PTAL than the New Cross Gate Retail Park site. SSL's proposals can deliver significant beneficial development and investment which will be lost should the site be safeguarded for BLE works.</p> <p>The Location of New Cross Gate Station The supporting text for the allocation states that the redevelopment will enable the delivery of new and improved transport infrastructure, including a new station to accommodate the Bakerloo line extension.</p> <p>As set out in our previous representations, the choice of New Cross Gate Retail Park is referred to in TfL's Stations Overview consultation document (2019) as follows: "In the 2017 consultation we consulted on our proposed site for the station being the site of the retail park lying on the west side of the existing New Cross Gate Rail station. A majority of respondents expressed support for this proposal." We can find no further or fuller explanation as to why New Cross Gate Retail Park has</p>		

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							<p>been chosen by TfL. There does not appear to be any strategic environmental assessment (SEA) undertaken by TfL or any in-depth evidence-based analysis, including a cost/benefit analysis to justify this selection. Furthermore, it is misleading to state that a majority of respondents expressed support for the proposal.</p> <p>At that time, TfL did not acknowledge that the existing Sainsbury's store will need to close as a result. Several stakeholders including local councillors (Cllr Charlie Davis and Cllr Liz Johnston-Franklin) have expressed concern over the loss of the Sainsbury's store, particularly in conjunction with the Tesco store in Old Kent Road, including the increased journeys to other supermarkets and the impacts of the closures as local employers.</p> <p>Finally, none of the TfL consultations have provided any information on how the buses which currently use the Sainsbury's site would be relocated during the construction period of the station. This is a matter about which local people will want to be informed.</p> <p>SSL does not believe that there has been adequate and effective consultation on the location of the station by TfL and the significant socio-economic and retail impacts of the loss of the Sainsbury's store have not been addressed. If the new Local Plan allocates the site for a new station, it will be incumbent upon the Council to undertake this work. The location of the station at New Cross Gate Retail Park as an interchange would be inefficient compared to the Goodwood Road site which is allocated in the Regulation 19 version of the Plan for 1,050sqm main town centre uses, 3,550sqm employment uses and 167 residential units. Furthermore, this site is in the better located in relation to New Cross District Centre and Goldsmiths University, so reducing travel distances and journey times when changing trains.</p> <p>Impact of the Closure of Sainsbury's The economic impact of the closure of the Sainsbury's store is outlined in full in our previous consultation response which is enclosed in Appendix 1.</p> <p>In summary: <ul style="list-style-type: none"> Given the level of deprivation experienced within the New Cross Gate area, it is apparent that the removal of the Sainsbury's store in its current format will detrimentally impact the community and potentially worsen its relative deprivation; </p>		

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							<ul style="list-style-type: none"> ▪ The employment created by the existing Sainsbury's store generates gross value added (GVA) of some £8.7million per annum. Therefore, removing this would have a significant impact on the local economy; ▪ The social value of the store to be £4.8million per annum and so the loss of this would have a significant economic impact; ▪ The current Sainsbury's store accounts for approximately 70% of the District Centre's convenience turnover generates approximately £55m in convenience turnover; ▪ The importance of local retail and access to food become even more stark during the COVID19 pandemic. Whilst the pandemic has altered the way people shop and the demand for online retail is growing, the provision of a supermarket in this location is vitally important for the vitality and viability of the District Centre and the local community; and ▪ The loss of the Sainsbury's store will have significant implications in terms of access to essential grocery needs for many residents. <p>The impact of the closure of the Sainsbury's store and the existing retail warehouses on New Cross/ New Cross Gate District Centre is a legitimate planning concern that must be taken into consideration as the new Local Plan process. Furthermore, in the absence of a credible business case for the BLE and with TfL's finances in a precarious position post pandemic, it is unlikely that the BLE will happen, even in the long term. By coupling the draft Local Plan to the illusory hope that the BLE will happen during the plan period, the Council is sterilising a sustainable development site that can deliver hundreds of homes, new jobs and major investment that will regenerate New Cross/ New Cross Gate District Centre and the wider area.</p> <p>We trust that these representations will be fully considered by the Council, and that the next iteration of the new Local Plan amended accordingly to ensure that SSL's New Cross Gate Retail Park site can be brought forward for much needed regeneration in the short term.</p> <p>We would welcome the opportunity to discuss this further in due course but in the meantime, if you require any further information, please do not hesitate to contact me.</p>		
CON054	REP283	Avison Young OBO			3	General LNA SA 17	<p>Joint Representation on behalf of Laurence Cohen and Melanie Curtis (Freehold Landowners) and CA Ventures and Fifth State (Developers of 5-9 Creekside, Deptford)</p> <p>We write on behalf of Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State (the Owners and Developers) in</p>	The Council notes and welcomes the general comments, contextualisation and broad level of support offered in relation to the new Local Plan – specifically in relation to the policy approach toward Lewisham North Area and Policy LNA SA 17	No further action required in relation to the new Local Plan.

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		Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State					<p>representation to the Lewisham Local Plan: Proposed Submission Document (January 2023) prepared by the London Borough of Lewisham (LBL), under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.</p> <p>Fifth State is a platform focused on delivering community-led workspace and residential offerings. Student resident well-being is at the heart of their model, and their buildings are designed and programmed to encourage a sharing and social ethos to help combat loneliness and mental health issues, which can be prevalent in large cities like London. Fifth State is promoting 5-9 Creekside, Deptford for employment-led mixed use redevelopment, incorporating the co-location of student accommodation.</p> <p>CA Ventures are a niche investor, developer and operator of student accommodation that has developed over 42,000 student beds, 78 communities and 48 university markets. Its approach is based on fostering thoughtful and creative design, recognising that it is key to the satisfaction and well-being of the students that call their communities home. CA ventures are currently constructing their first community-led, mixed use purpose-built student accommodation scheme on Trundley's Road and will be delivering the proposals set out in the planning application for 5-9 Creekside, Deptford (Ref. DC/23/131085).</p> <p>Having reviewed the Regulation 19 version of the draft Local Plan and the accompanying evidence base documents, this letter provides a summary of the site and background, responses to individual policies as well as further comments on the development potential of the site (Site Allocation 17 Lower Creekside Locally Significant Industrial Site). The Owners and Developers support the Vision for Lewisham as set out in the draft Local Plan, in particular that Lewisham will continue to be a dynamic place which supports local businesses, arts and cultural establishments, and where people thrive.</p> <p>The Strategic Objectives which accompany the Vision support the creation of inclusive, mixed and balanced neighbourhoods, making the best use of employment land to increase the number of jobs and provide suitable spaces for businesses, and making optimal use of land through the regeneration of Opportunity Areas.</p> <p>We hope that the comments on the individual policies within the draft Local Plan provided below will assist the Council in</p>	<p>Lower Creekside Locally Significant Industrial Site.</p> <p>The Council remains committed to working with development partners to facilitate the delivery of planned-for growth across the Borough – inclusive of meeting the housing, employment, town centre, retail, and infrastructure network needs of residents and communities. The Council considers that the new Local Plan, through its spatial strategy, site allocations and planning policies provides a sound platform for securing this objective – both through plan-making and decision-taking.</p>	

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							<p>preparing its final Submission Local Plan and during its examination.</p> <p>CONTEXT OF THE REPRESENTATION (5-9 CREEKSIDE) This section summarises the site and surrounding area and outlines the emerging scheme proposals at 5-9 Creekside. Site and Surrounding Area The site comprises an existing two storey building / part warehouse and servicing yard. The buildings are currently occupied by a wholesale alcohol distributor and cash and carry (Use Class B8) and artist studios (Use Class E).</p> <p>The total existing floorspace is 2,460 sqm. 5-9 Creekside is bound to the east and south by Creekside Road. The northern boundary backs on to the Crossfields Estate and to the west of the site is 3 Creekside which comprises the Medina Works building which accommodates a mix of art gallery, studios and creative workspaces. The wider Deptford Creekside area is undergoing change, with nearby developments including the Fuel Tank employment space managed by Workspace, mixed-use commercial and residential developments at Kent Wharf, Sun Wharf and Faircharm Dock and the Trinity Laban Conservatoire of Music and Dance.</p> <p>1 Creekside has substantially completed its recent planning consent permission for an 8 storey building which will deliver 56 homes and 1,541 sqm of commercial space (Ref. 18/106708). In addition, planning applications for 2 Creekside (Ref. DC/22/125897) and 3 Creekside (Ref. DC/22/129784) have been submitted, following collaborative work with the developers of 5-9 Creekside to develop the proposals for all three sites.</p> <p>Emerging Development Proposals Fifth State and CA Ventures have recently submitted a planning application for the redevelopment of 5-9 Creekside for a mixed-use development comprising commercial and student accommodation uses (Ref. DC/23/131085). The scheme proposals responds to the wider vision of the changing character of Creekside and neighbouring sites, as well as the wider Deptford area.</p> <p>The key principles of the proposed design include: – Demolition of existing buildings to create replacement workspace on site which is being designed to respond to local market demand for employment space such as light industrial or creative industries and create an overall increase in jobs; – Delivering an employment-led mixed-use development</p>		

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							<p>including the introduction of colocation of student accommodation; Providing high quality student accommodation and complementary facilities which are suitable with the continued employment operation of the site;</p> <p>– Working collaboratively with neighbouring landowners to develop a comprehensive design approach to the regeneration of the area; and – Responding positively to the Deptford Creekside Conservation Area. The above principles have been underpinned by the relevant technical and environmental assessments.</p> <p>Comments on Local Plan Main Issues and Preferred Approaches Document</p> <p>Melanie Curtis, Laurence Cohen and Fifth State Ltd previously provided representations in respect of various sections of the Local Plan Main Issues and Preferred Approaches Document (Regulation 18 draft) in April 2021. These representations are provided in Appendix 1 for completeness.</p>		
CON054	REP284	<p>Avison Young</p> <p>OBO</p> <p>Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State</p>			2	OL 01	<p>COMMENTS ON LOCAL PLAN: PROPOSED SUBMISSION DOCUMENT: JANUARY 2023 Draft Policy</p> <p>OL1 - Delivering an Open Lewisham (spatial strategy)</p> <p>The Owners and Developers of 5-9 Creekside strongly support the strategy to direct new development to growth and regeneration nodes and well-connected sites in the opportunity areas to deliver an Open Lewisham as set out in draft Policy OL1. Ensuring that the growth of Lewisham's Opportunity Areas, including Deptford Creek / Greenwich Riverside, is managed in accordance with the local character (part a), and promoting the optimisation and intensification of Strategic Sites (part F) will ensure that development potential is able to be maximised and will encourage the most efficient use of land, in line with paragraph 120 of the NPPF.</p> <p>The Owners and Developers also support Part G of the draft policy which requires development to be delivered through a design-led approach to make the most optimal use of land and respond positively to local distinctiveness in order to deliver inclusive, safe neighbourhoods.</p>	<p>The Council notes and welcomes the support offered in relation to the new Local Plan Policy OL 1 Delivering and Open Lewisham (Spatial Strategy).</p> <p>The respondent's strong support for the strategy to direct new development to growth and regeneration nodes and well-connected sites in the opportunity areas to deliver an Open Lewisham is highlighted.</p> <p>The respondent's support for delivery of growth through a design-led approach is also highlighted.</p>	No further action required in relation to the new Local Plan.
CON054	REP285	<p>Avison Young</p> <p>OBO</p> <p>Laurence Cohen, Melanie Curtis, CA</p>			2	QD 01	<p>Draft Policy QD1 – Delivering high quality design in Lewisham</p> <p>Whilst the Owners and Developers of 5-9 Creekside support, in principle, the draft policy which advocates a design-led approach to development, it is considered that in order to reflect London Plan Policy D3 (optimising site capacity through the design-led approach), further text should be added which positively promotes optimising the capacity of sites, including site allocations, providing policy support for higher density developments in well connected locations.</p>	<p>The Council notes and welcomes the in-principal support offered in relation to the new Local Plan Policy QD 1 Delivering High Quality Design in Lewisham. The Council considers that this is a key and necessary element for securing sustainable development and successful place-making.</p>	No further action required in relation to the new Local Plan.

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		Ventures and Fifth State					In our view, the proposed amends would ensure the policy is consistent with national and strategic policy and would subsequently enable the delivery of sustainable development in accordance with the NPPF and London Plan. Such wording is considered necessary to ensure that the Local Plan is able to be found to be positively prepared and consistent with the NPPF and London Plan.	<p>The respondent's suggestion that additional text be added to the policy to explicitly promote optimising site development capacities is noted. For clarity, this specific matter is addressed for all forms of development proposal through the site allocations and the general planning policies. The new Local Plan Policy QD 6 Optimising Site Capacity states –</p> <p><i>“Development proposals must use the design-led approach to make the best use of land and optimise the capacity of a site, with reference to Policy QD1 (Delivering high quality design in Lewisham).”</i></p> <p>The Council considers this a sound approach to address this key matter.</p>	
CON054	REP286	Avison Young OBO Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State			2	QD 04	<p>Draft Policy QD4 – Building heights</p> <p>Figure 5.1 identifies locations which are suitable for tall buildings.</p> <p>The Owners and Developers of 5-9 Creekside welcome and support the identification of Creekside as a location which is suitable for the development of tall buildings. This reflects its position within the Deptford Creek / Greenwich Riverside Opportunity Area. We consider that Part A of the policy, which sets a clear quantitative definition for a tall building in Lewisham, in combination with Part C of the policy, which defines height ranges for tall buildings in specific localities aligns with London Plan Policy D9 Part A and is supported.</p> <p>However, we note that Part D of the policy prescriptively prohibits any exceedance of the maximums set out in Part D and does not set out any parameters where exceedances could be acceptable. We consider that clear parameters for exceedances are set out to ensure that they have due regard for the emerging context and ensure the most efficient use of land. In our view setting maximum building heights is overly restrictive and could stymie the optimisation of sites through the design led approach, as set out in London Plan Policy D3. London Part D of the draft policy QD4 lists assessment criteria for tall buildings, with D(c) referring to heights being sensitive to the site's immediate and wider context.</p>	<p>The Council notes and welcomes the support offered in relation to the new Local Plan Policy QD 4 Building Heights – specifically in relation Figure 5.1 and the identification of the Creekside area as being suitable for tall buildings.</p> <p>The comments relating to the approach to maximum heights, set out under Policy QD 4 D, is noted. The Council acknowledges that the respondent is correct in stating that Policy QD 4 is in alignment, consistency, and conformity with the London Plan Policy D 9 Tall Buildings, which seeks to manage tall new buildings to –</p> <p><i>“...facilitate regeneration opportunities and manage future growth, contribute to new homes and economic growth”</i> (London Plan Paragraph 3.9.1).</p> <p>It is highlighted that the Greater London Authority and the Council worked in partnership to ensure that the new Local Plan's approach towards tall new buildings was in accordance with the London Plan. For clarity, the London Plan states –</p>	No further action required in relation to the new Local Plan.

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							<p>We consider that this criterion should also refer to the emerging immediate and wider context, given that most areas identified for tall buildings are also subject to emerging site allocations for development and therefore the context will change as these allocations are realised. This will ensure the most efficient use of land in these locations, such as Deptford Creekside.</p> <p>Overall, we consider that the proposed policy wording and supporting text as drafted is not positively prepared or justified, and will place overly restrictive limits on development.</p>	<p><i>“Boroughs should determine and identify locations where tall buildings may be an appropriate form of development by undertaking the steps below: 1) based on the areas identified for growth as part of Policy D1 London’s form, character and capacity for growth, undertake a sieving exercise by assessing potential visual and cumulative impacts to consider whether there are locations where tall buildings could have a role in contributing to the emerging character and vision for a place 2) in these locations, determine the maximum height that could be acceptable 3) identify these locations and heights on maps in Development Plans.”</i> (London Plan Paragraph 3.9.2)</p> <p>For this reason, the Council considers that Policy QD 4 is sound and entirely consistent with the approach set out in the London Plan.</p>	
CON054	REP287	<p>Avison Young</p> <p>OBO</p> <p>Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State</p>			2	QD 06	<p>Draft Policy QD6 – Optimising site capacity The Owners and Developers of 5-9 Creekside support draft Policy QD6 which requires a designed approach to be taken to optimise site capacity and establish an appropriate development density.</p> <p>This is considered to broadly align with London Plan Policy D3, however further advocacy of delivering higher density developments in appropriate locations should also be incorporated into this policy.</p> <p>Paragraph 5.44 of the draft Local Plan states that the policy seeks to ensure that ‘the delivery of Good Growth will necessitate that new developments use the Borough’s limited supply of land effectively and efficiently whilst improving the quality of places and spaces that people inhabit and use, along with the natural environment’. As such, support for higher density development should be explicitly expressed within the policy wording itself.</p> <p>The Owners and Developers of 5-9 Creekside support the introduction of Part C to this policy, which notes that where development proposals do not meet the indicative capacity, they will only be supported where it is clearly demonstrated</p>	<p>The comments and general support offered in relation to the new Local Plan Policy QD 6 Optimising Site Capacity is welcomed.</p> <p>The specific comments and associated amendments suggested in relation to achieving “higher density developments” are noted. However, the Council maintains that the policy objective is to optimise development capacity (and yields). This being achieved through the application of master planning and design-led approaches. The Council considers that this will secure higher density developments – inclusive of tall new buildings in locations where such development is demonstrably suitable and sustainable. For further clarity, the Council considers that this approach will ensure that appropriate optimal densities are still secured in those places that do not have the capacity to accommodate the “higher/ highest” density development. For these</p>	<p>Subject to it being demonstrably necessary to ensure the soundness of the new Local Plan Policy QD 6, suggest that Paragraph 5.44 be amended through the modifications process as follows –</p> <p><i>“5.44 Development proposals must demonstrate how they will deliver the optimum capacity of a site. The optimum capacity is one that is derived through careful consideration of density taking into account the site’s local character, the types of uses proposed, access to public transport and the infrastructure available to support the development. The optimum capacity is not the maximum capacity or density. The indicative capacities identified for the site allocations provide a starting</i></p>

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							<p>that the optimal capacity will be achieved, having regard to Parts A and B of the policy.</p> <p>However, it would be helpful if draft Policy QD6 could explain that the indicative development capacity figures proposed as part of all the draft Site Allocations are not intended to be a cap on development quantum, rather a broad indication of capacity.</p>	<p>reasons, the Council considers the policy to be sound.</p> <p>Finally, the comment made in relation to further definition of the indicative development capacity figures is noted and welcomed. Should an amendment be necessary to ensure the soundness of the policy the Council could consider a modification to accommodate this suggested change.</p>	<p><i>point for this process and are not intended to be a cap on potential development quantum. Development proposals should provide evidence of an options appraisal..."</i></p>
CON054	REP288	<p>Avison Young</p> <p>OBO</p> <p>Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State</p>			2	HE 01	<p>Draft Policy HE1 – Lewisham’s historic environment</p> <p>The Owners and Developers of 5-9 Creekside support the thrust of draft Policy HE1 which seeks to preserve or enhance Lewisham’s historic environment. Part B of the policy provides a simplified version of the assessment of potential impacts from the key heritage tests outlined in NPPF paragraphs 199 to 202, which will be the relevant tests against which planning decisions will be made should the proposed development lead to either substantial or less than substantial harm. The policy therefore aligns with the national and strategic framework and we have no further comment to make at this time.</p>	<p>The Council notes and welcomes the support offered in relation to the new Local Plan Policy HE 01 Lewisham’s historic environment.</p>	<p>No further action required in relation to the new Local Plan.</p>
CON054	REP289	<p>Avison Young</p> <p>OBO</p> <p>Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State</p>			2	HE 02	<p>Draft Policy HE2 – Designated heritage assets</p> <p>We recognise that Conservation Areas are subject to statutory protection under Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990, which states that ‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’. The 1990 Act and NPPF paragraph 206 note that new development can benefit the character and appearance of a conservation area through enhancements.</p> <p>Part E of draft Policy HE2 states that ‘the demolition of buildings or structures that make a positive contribution to the character or appearance of a conservation area will be resisted’. The Developers of 5-9 Creekside do not agree with the wording of this criterion as drafted as it fails to accurately reflect how the impact of development proposals on a conservation area should be assessed. The impact of development proposals on a conservation area must take into account the development proposals as a whole, i.e. the impact of demolition as well as the impact of the replacement proposals (as established through Dorothy Bohm v SSCLG (2017)). Even in cases where the building or feature proposed to be demolished is identified as making a positive contribution to the area, it is necessary to consider the effect of the replacement proposals, as if the contribution made by</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy HE 02 Designated heritage assets – specifically in relation to the approach for determining proposals that result in the demolition of buildings or structure identified as making a positive contribution to Conservation Areas.</p> <p>For clarity, buildings and structures that make a positive contribution towards the visual character and appearance of Conservation Areas are logically key components of the wider designated heritage asset. Within that context it is legitimate for local planning authorities to seek their retention and incorporation as component parts of proposals relating to Conservation Areas. Within the context of the new Local Plan Policy LNA SA 17, positive (and indeed negative and neutral) buildings are identified under the Deptford Creekside Conservation Area Townscape Appraisal Map in the Deptford Creekside Conservation Area Appraisal.</p>	<p>No further action required in relation to the new Local Plan.</p>

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							<p>the replacement is equivalent or better than existing, this would result in no harm or a heritage benefit.</p> <p>As such it is suggested that Part E of the policy is rephrased to better reflect the relevant heritage tests, as set out below: 'Buildings or structures that have been identified to make a positive contribution to the character or appearance of the conservation area should be retained wherever possible, and where buildings and structures are proposed to be demolished the impacts of the demolition should be balanced against the impacts of the replacement proposals.'</p>	<p>For clarity, the Council highlights that the assessment of whether a development proposal makes a positive contribution to a Conservation Area or not is assessed according to 10 criteria set out on page 21 of HE guidance CA appraisal, designation & management. Within this context the Council concludes that it would be extremely challenging for a new building to be assessed as making a positive contribution because it could not meet those criteria; except for - <i>"Does it individually, or as part of a group, illustrate the development of the settlement in which it stands?"</i> The Council highlights this point as it is the one criterion that always gets disputed at Appeals. This is because one could say that any building could meet this criterion.</p> <p>Consequently, the Council suggests that such proposals might deliver an "excellent building", but nevertheless it would unlikely be considered to make a positive contribution in conservation terminology that could then be used to outweigh the harm that would result from losing an identified positive contributor.</p> <p>In conclusion, the Council concludes that the new Local Plan should maintain the approach required through national planning policy, which in such a case would be to assess the significance of both Conservation Area (Designated Heritage Asset) and Non-designated Heritage Asset (positive contributor) and then assess the impact of the proposals on both assets according to the tests for Designated Heritage Assets (which require weighing the harm) and Non-designated Heritage Assets (which requires just taking into account).</p> <p>Finally, the Council notes that a prospective developer may at the list of criteria for positive contributors and</p>	

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								<p>conclude that a new building could meet some of them, but the guidance makes clear that these relate to historic buildings stating that -</p> <p><i>Page 20 - The extent to which their contribution is considered as positive depends not just on their street elevations but also on their integrity as historic structures and the impact they have in three dimensions, perhaps in an interesting roofscape or skylineA positive response to one or more of the following may indicate that a particular element within a conservation area makes a positive contribution, provided that its historic form and value have not been eroded.</i></p>	
CON054	REP290	<p>Avison Young</p> <p>OBO</p> <p>Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State</p>			2	HE 03	<p>Draft Policy HE3 – Non-designated heritage assets</p> <p>The Owners and Developers of 5-9 Creekside note that the wording of draft Policy HE3 Part A which identifies that ‘development proposals will only be supported where they preserve or enhance the significance of a locally listed building or other non-designated heritage asset, and the asset’s setting’ goes beyond the NPPF Paragraph 203 test which states that ‘the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’. As outlined in our comments above, it will be necessary for a balancing exercise to take place to assess the impact of the loss of a designated or non-designated heritage assets which must be considered against the replacement development proposal, as well any public benefits which arise from the development proposals.</p> <p>Part B of draft Policy HE3 sets out a blanket refusal of any schemes that harm the significance of a non-designated heritage asset. As above, we consider this to go beyond the test set out in paragraph 203 of the NPPF, which requires the effect of development proposals on the significance of heritage assets require a balanced judgement. We consider that for soundness and consistency purposes Parts A and B of</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy HE 03 Non-designated Heritage Assets – specifically in relation to proposals that have an impact on locally listed buildings or other non-designated heritage impacts.</p> <p>The comments made in relation to NPPF Paragraph 203 and the implications for the new Local Plan are noted. Nevertheless, the Council contends that the new Local Plan is justified, in terms of the supporting evidence; and effective. Specifically in the case of the latter matter – the policy still allows decision-takers to exercise judgement. It is a fact that the policy wording allows proposals to be considered where they</p> <p><i>“preserve or enhance the significance of a locally listed building or other non-designated heritage asset, and the asset’s setting.”</i></p> <p>Or in potentially more exceptional circumstances, consider proposals that justify the harm to the significance of a</p>	No further action required in relation to the new Local Plan.

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							draft Policy HE3 should be redrafted to reflect Paragraph 197 of the NPPF, which requires a balanced judgement to be taken (rather than specifically looking to preserve or enhance the significance of a non-designated heritage asset or otherwise refusing the application).	non-designated heritage asset and its setting. For these reasons, the Council considers the policy sound.	
CON054	REP291	Avison Young OBO Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State			2	HO 07	<p>Draft Policy HO7 – Purpose built student accommodation</p> <p>The NPPF Paragraph 11 requires that: a) plans should promote a sustainable pattern of development that seeks to meet the development needs of their area, and adapt to its effects; and b) that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. NPPF Paragraph 62 goes on to state that ‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including [...] students).’ London Plan Policy H15 considers purpose-built student accommodation (PBSA) and requires Boroughs to ensure that local and strategic need for PBSA is addressed.</p> <p>The overall strategic requirement for PBSA in London is for 3,500 bed spaces to be provided annually over the plan period. Borough level targets for PBSA bed spaces are not provided as it is acknowledged that the location of need will vary over the plan period in line with higher education institution growth and expansion plans, together with the availability of appropriate sites.</p> <p>The Draft Local Plan is underpinned by the Lewisham Strategic Housing Market Assessment (2022) which considers the need for different types of accommodation and affordable housing needs drawing on demographic data and information provided from LBL and stakeholder consultation. The main finding in respect of student housing is that ‘there is a considerable student population in Lewisham that is partly housed in the private rented sector and partly on-campus. Whilst pressure on the private rented sector from students has been mitigated by the delivery of significant amounts of PBSA, the sector will continue to be subject to demand from students unable to afford PBSA.’ We note that paragraph 6.71 of the SHMA identifies that there were 2,553 student only households in the borough.</p> <p>Whilst the SHMA provides an overview of student accommodation provided at Goldsmiths University and the University of Greenwich, no conclusion is drawn on the need for the delivery of PBSA in Lewisham.</p> <p>The SHMA acknowledges that there will continue to be pressure on the private rented sector to accommodate</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy HO 07 Purpose Built Student Accommodation.</p> <p>The comments made in relation to the scale of purpose-built student accommodation need are noted. For clarity, it is highlighted that the Capital’s housing market area is London-wide. This applies to all forms of residential accommodation and is due to a wide range of factors – including accessibility, affordability, and supply. Consequently, the Council considers that the available evidence of need from this sector is proportionate for plan-making purposes. It is unclear what additional value could be gained from more detailed locally prepared data. For example, the Council could not reasonably expect to use such data for decision-taking (IE to refuse proposals on the grounds that the requirement had been met). The fact remains that the overwhelming housing need is for new genuinely affordable homes and market housing – not highly specialised forms of residential accommodation.</p> <p>The comments made in relation to geography and meeting needs in proximity to existing education-institute clients is noted. However, in response the Council reiterates that the high quality and frequency of public transport and accessibility to other sustainable transport networks make this point redundant. In fact, it is equally possible that under such conditions, geographic locations in Greenwich or Southwark may provide more sustainable choices for decision-takers.</p>	No further action required in relation to the new Local Plan.

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							<p>students, but does not identify how much PBSA is needed to address future need and demand. As such we question whether the NPPF requirement to objectively assess need for student housing has been adequately fulfilled by this assessment and we would recommend transparency around student housing need is provided within the Draft Local Plan.</p> <p>Notwithstanding concerns regarding the evidence base, draft Policy HO7 provides a supportive basis for assessing development proposals for PBSA. The policy wording broadly reflects London Plan Policy H15 requirements for PBSA, which the Developers of 5-9 Creekside endorse.</p> <p>Part A of draft Policy HO7 sets out parameters that student housing proposals must demonstrate compliance with. Supporting paragraph 7.756 recognises that Lewisham is home to a number of further and higher education providers, particularly in north Lewisham which is home to Goldsmiths College, Trinity Laban Conservatory of Music and Dance and Lewisham College, as well as the nearby Greenwich University. As such it is considered that applications for PBSA coming forward in the north of the borough will be able to satisfactorily demonstrate that they will help to meet an identified strategic need for student accommodation (meeting policy requirement HO8 Part A(a)).</p> <p>Whilst the supporting paragraph makes reference to the geographical concentration of education institutions in certain parts of the borough, this should also be acknowledged in the policy wording as draft Policy HO7 requires the concentration of PBSA in the area to be considered, which will be influenced by the proximity to education institutions. Part A(b) of draft Policy HO7 requires the accommodation to be secured for use by students as demonstrated by an agreement with one or more specific higher education provider(s). We would suggest this is extended to include nominations agreements with student housing management companies to provide greater flexibility whilst also securing use by students.</p> <p>We note that Part A(c) of the policy seeks to secure the maximum level of affordable student accommodation in line with the London Plan. However, policy H17 of the London Plan sets out a fast track route for PBSA schemes that deliver 35% affordable housing. We would suggest that the eligibility to follow the fast track route is set out clearly in draft Policy HO7 rather than in supporting paragraph 7.59. Fifth State acknowledge that the Borough's main strategic requirement is for genuinely affordable, conventional housing, and that PBSA</p>	<p>The comments made in relation to securing a proportion of affordable housing from purpose student accommodation proposals are noted. For clarity, as acknowledged, this matter is addressed through the policy supporting text. As with other areas – the new Local Plan must be read and considered in its entirety. Furthermore, there is no need for the new Local Plan to slavishly reproduce the London Plan in full for it to be consistent. Decision-takers will consider the Lewisham development plan in its entirety. For these reasons, the Council considers the new Local Plan sound.</p>	

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							will be counted as delivering homes against the Borough's strategic housing target and will be counted on a 2.5:1 basis (i.e. two and half PBSA bedrooms to one unit of conventional housing).		
CON054	REP292	Avison Young OBO Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State			2	EC 02	<p>Draft Policy EC2 – Protecting employment sites and delivering new workspace</p> <p>Draft Policy EC2 seeks to safeguard land for commercial and industrial uses through retaining employment capacity within Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). We note that Lower Creekside is identified as a LSIS which are identified in Table 8.1 as providing for the borough's 'main local concentrations of commercial and industrial uses, which perform a niche role to support the functioning of the sub-regional and local economy. They provide workspace for micro, small and medium sized businesses, including the cultural, creative and digital industries. Protected for commercial and industrial uses, with priority given to Class B1 commercial and light industrial uses.'</p> <p>Part B(a) of draft Policy EC2 states that within SIL and LSIS locations industrial capacity should be retained 'ensuring no net loss of floorspace and operational yard space along with intensifying employment development, including by facilitating the co-location of employment and other compatible uses through the plan-led process'.</p> <p>The supporting explanatory text advises that safeguarding of employment land includes 'floorspace, yard space for operations and servicing space'.</p> <p>The Owners and Developers of 5-9 Creekside support the principle of intensifying employment development and the ability to co-locate employment uses alongside other uses. They also welcome the removal of the requirement to ensure no net loss of operational yard space, which is consistent with Policy E7 of the London Plan.</p>	The Council notes and welcomes the support offered in relation to the new Local Policy EC 02 Protecting employment land and delivering new workspace, and its associated supporting text.	No further action required in relation to the new Local Plan.
CON054	REP293	Avison Young OBO Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State			2	EC 03	<p>Draft Policy EC3 – High quality employment areas and workspace</p> <p>Whilst the Owners and Developers of 5-9 Creekside support draft Policy EC3, which outlines a number of criteria to promote the delivery of high quality, flexible and suitable workspaces for micro, small and medium-sized businesses, the requirement set out in Part A(b) is unlikely to be deliverable in all instances. It is recommended that in order to be effective, the policy wording provides a greater degree of flexibility, noting that all tenants may not seek prior internal fit out beyond shell and core.</p>	The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy EC 03 High quality employment areas and workspace. The specific comments made in relation to the development requirements set out under Policy EC 03 A. The Council maintains that the policy is effective and reasonable. For clarity, the policy speaks to making provision and providing flexibility. For further clarity Paragraph 8.18 states –	No further action required in relation to the new Local Plan.

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								<i>“Proposals limited to ‘core’ and ‘shell’ only specifications are not considered appropriate and will be strongly resisted. This requirement is necessary to ensure the attractiveness and marketability of units, particularly in promoting early take up of workspace and helping to prevent long-term vacancies. It is also vital to supporting mirco, small and independent businesses which are unlikely to be in a position to absorb the initial overhead costs for fit out. The appropriate level of fit out will be considered on a site-by-site basis.”</i>	
CON054	REP294	Avison Young OBO Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State			2	EC 04	<p>Draft Policy EC4 – Low cost and affordable workspace We note that Part B of this policy has been amended to include the retention of existing low cost workspace. Whilst the Owners and Developers of 5-9 Creekside strongly support the retention of existing affordable workspace on employment sites, the requisite to retain existing low cost workspace is onerous and without justified threshold.</p> <p>The definition of ‘low cost workspace’ is unclear and it must be noted that many existing employment sites yield rental prices equivalent to the value and quality of the floorspace. Where developers undertake significant cost to update and renew these workspaces, the natural market response is that rental prices increase and this is an important incentive that allows development to be brought forward. If an onerous requirement to retain low cost workspace is introduced it will undermine the deliverability of schemes seeking to redevelop, renew and modernise employment sites across the borough through significant burden upon viability. This may subsequently threaten the delivery of the plan insofar as it relates to the delivery of improved and increased employment/industrial capacity and the creation of new jobs, and the provision of new affordable workspace for SMEs.</p> <p>We would therefore suggest Part B of draft policy EC4 is revised to replace ‘low cost’ with ‘affordable’ throughout such that the parameter and key terms are more clearly defined. The Owners and Developers of 5-9 Creekside broadly support the principle of delivering affordable workspace across the borough.</p> <p>The proposed draft Policy wording seeks major developments to provide at least 10% of new employment floorspace as affordable workspace at 50% of market rents. However, in line with the requirements set out in the NPPF, due consideration</p>	<p>The Council notes that the respondent strongly supports the retention of existing affordable workspace on employment sites. The further comments objecting to requirement to retain existing low-cost workspace are noted.</p> <p>For clarity, the London Plan sets out the strategic requirements for affordable workspace under Policy E3 Affordable workspace. Further clarification is provided under the new Local Plan Policy EC 04 Paragraph 8.23, which states –</p> <p><i>“As set out in the London Plan, low-cost workspace refers to secondary and tertiary space that is available at open market rents, which is of a lower specification than prime space. This type of space is often located at the back of town centre sites, under railway arches and in smaller or constrained industrial sites. It accommodates traditional business sectors and, in Lewisham, has a key local role in supporting the cultural, creative and digital industries.”</i></p> <p>Based on the representation, it is unclear to the Council what level of additional detail would satisfy the respondent. The Council maintains the policy approach provides decision—takers with sufficient flexibility to be informed by robust evidence provided in support of development proposals. This includes</p>	No further action required in relation to the new Local Plan.

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							of scheme viability must also be incorporated within the policy. As such, in the absence of supportive evidence to justify the affordable workspace parameters proposed, we consider that the policy wording should be amended to incorporate a greater degree of flexibility, noting that it may be possible to deliver a wider public benefit where a greater quantum of floorspace is offered as affordable workspace at a slightly lower discount rate (e.g. 20% discount), subject to site specific circumstances and the employment land profile in the immediate area. The application of a blanket affordable workspace requirement without scope for viability considerations or site specific conditions does not comply with the NPPF (thereby raising issues of soundness) and may prohibit the delivery of affordable workspace to meet local needs.	suitable evidence to demonstrate any unreasonable constraints that may be placed upon development viability. It remains open for development partners to demonstrate and justify such issues through decision-taking. The Council highlights that the strategic-level viability assessment of the new Local Plan has not identified this matter as a constraint to delivery. For these reasons, the Council considers the policy to be sound.	
CON054	REP295	Avison Young OBO Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State			2	EC 06	<p>Draft Policy EC6 – Locally Significant Industrial Sites</p> <p>The Owners and Developers of 5-9 Creekside broadly support the aims of draft Policy EC5 which supports the co-location of employment and other compatible uses at selected LSIS locations (including Lower Creekside).</p> <p>Supporting paragraph 8.35 recognises that site allocation policies have been prepared for colocation LSIS sites to ensure that co-location is coordinated and appropriately managed through the masterplan process, particularly to ensure that the function of the LSIS is not eroded by piecemeal development.</p> <p>Whilst the Owners and Developers of 5-9 Creekside strongly support this recognition, we consider the supporting text could go further and note that a master plan approach will not be necessary where sites have already been identified for co-location by virtue of a Site Allocation.</p> <p>Within supporting paragraph 8.36, the draft Local Plan states that schemes which result in a net loss of industrial capacity will only be considered in very exceptional circumstances and goes on to state that ‘proposals will be required to provide a minimum of 50 per cent of genuinely affordable housing on the residential element’. Whilst this position is understood and reflects the London Plan position where there is a loss of industrial capacity, we consider it would be helpful to provide further clarity within the policy wording for proposals that would result in no net loss of industrial capacity schemes would be required to provide a minimum of 35% of genuinely affordable housing on the residential element (to qualify for the Fast Track Route in accordance with London Plan Policies H5 and E7).</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy EC 06 Locally Significant Industrial Sites (LSIS).</p> <p>The comments made in relation of the policy requirement that proposals are brought forward through master planning are noted. The Council maintains that this is reasonable and sound – even in circumstances when co-location is identified through site allocations. For clarity, master planning addresses much more than just the nature and quantum of development. The Council maintains that the policy approach is reasonable, sound and necessary to secure good quality design and successful place-making.</p> <p>The further comments made in relation to policy requirement for genuinely affordable housing are noted. For clarity, the policy has been prepared in accordance with the London Plan and the Council considers that the new Local Plan’s approach is consistent with that set out in that document.</p>	No further action required in relation to the new Local Plan.

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CON054	REP296	Avison Young OBO Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State			2	EC 10	Draft Policy EC10 – Workplace training and job opportunities Draft Policy EC10 seeks to a threshold approach to calculating financial contributions to workplace training. It is noted that this applies a value of £715 per dwelling/job created by the development to reach an overall financial contribution. We consider that greater flexibility to the application of this contribution should be applied, particularly noting that some schemes will be delivered with a strong social value strategy that seeks private partnerships and commitments towards procuring local staff and partnering with local education institutions. In instances where a strong social value strategy is committed to and secured by the Section 106 legal agreement, financial contributions for the delivery of workplace training can reasonably be reduced.	The Council notes the comments made in relation to the new Local Plan Policy EC 10 Workplace training and job opportunities. The suggestion that the provision of some form of on-site social value in some way serves to provide an alternative “payment in kind” is considered unsound. The respondent has not provided any form of justification for this suggested modification nor demonstrated that it is reasonable and enforceable. In contrast, the application of tariff provides a justified, transparent, and straightforward mechanism for securing this objective. For these reasons, the Council concludes that the policy approach is sound.	No further action required in relation to the new Local Plan.
CON054	REP297	Avison Young OBO Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State			2	EC 18	Draft Policy EC18 – Culture, creative industry and night-time economy Support and promotion of cultural and creative industries in the borough and the creation of the Lewisham North Creative Enterprise Zone (CEZ) covering the Lower Creekside area is strongly supported by the Developers.	The Council notes and welcomes Avison Young’s support for the new Local Plan policy EC 18 Culture, creative industry and night-time economy .	No further action required in relation to the new Local Plan.
CON054	REP298	Avison Young OBO Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State			2	SD 02	Draft Policy SD2 - Sustainable design and retrofitting Part C of the draft Policy requires new non-residential development of 500 sqm or more to achieve a BREEAM ‘Excellent’ rating. We welcome the introduction of specific wording to enable consideration of any site specific technical constraints which may mean that an ‘Excellent’ rating cannot be achieved.	The Council notes and welcomes Avison Young’s support for the amendments made to the new Local Plan policy SD 02 Sustainable design and retrofitting to enable consideration of any site-specific technical constraints.	No further action required in relation to the new Local Plan.
CON054	REP299	Avison Young OBO Laurence Cohen,			3	LNA Vision	Comments on Lewisham’s North Area Draft North Area Vision and Spatial Objectives The Council’s vision for Lewisham North Area is strongly supported by the Owners and Developers of 5-9 Creekside. The vision re-imagines Deptford Creek to provide a well integrated employment area and mixed-use neighbourhood. In addition the Creative Enterprise Zone will cement Lewisham’s	The Council notes and welcomes Avison Young’s support for the Lewisham’s North Area Vision	No further action required in relation to the new Local Plan.

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		Melanie Curtis, CA Ventures and Fifth State					position as a leader in the creative and cultural industries which will feature modern and affordable workspace, including artist studio space, building on the presence of Goldsmith's College, Trinity Laban and Albany Theatre. The objective to establish a Creative Enterprise Zone at Deptford Creekside fits well with the development aspirations the Developers have for 5-9 Creekside.		
CON054	REP300	Avison Young OBO Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State			3	LNA 01	Draft Policy LNA1 – North Area place principles The Owners and Developers of 5-9 Creekside support Part A of the draft policy which seeks to facilitate Good Growth, with reference to draft policy OL1. Whilst the Developers agree that heritage-led regeneration will be important within the North Area, particularly for areas identified in Part D(a) to (c) (including Royal Naval Dockyard, Grand Surry Canal and Deptford High Street and New Cross High Street), where sites are identified to accommodate growth to support the Council's objectively assessed needs, heritage considerations must be considered alongside public benefits as part of the overall planning balance (this has already been mentioned in response to draft Policies HE2 and HE3).	The Council notes the comments made in relation to the new Local Plan Policy LNA 1 North Area place principles. It is acknowledged that development proposals will be guided by many of the new Local Plan's policies. The Council considers this sound and entirely normal – decision-taking is equally a matter of judgement and the policy allows for that to happen.	No further action required in relation to the new Local Plan.
CON054	REP301	Avison Young OBO Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State			3	LNA 03	Draft Policy LNA3 – Creative Enterprise Zone The creation of a new Creative Enterprise Zone (CEZ) covering the Lower Creekside area is strongly supported by the Owners and Developers of 5-9 Creekside.	The Council notes and welcomes Avison Young's support for the new Local Plan policy LNA3 Creative Enterprise Zone	No further action required in relation to the new Local Plan.
CON054	REP302	Avison Young OBO Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State			3	LNA SA 17	Comments on draft Site Allocation 16 (Lower Creekside Locally Significant Industrial Site) The following sections assess the soundness of the draft Site Allocation 17 in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF) (2021), which states that a Local Plan should be positively prepared, justified, effective and consistent with national planning policy. Site Allocation (Indicative Development Capacity) Site Allocation 17 comprises a number of development sites along Lower Creekside, including 5-9 Creekside which is bound by the road to the south and east. The summary page identifies that the whole site allocation comprises 1.1 ha, and has an indicative capacity for 162 residential units and 8,201 sqm of	The Council notes the comments made in relation to the new Local Plan Policy LNA SA 17 Lower Creekside Locally Significant Industrial Site – specifically in relation to its use of indicative capacities. Comments made in relation to the site allocations possible development capacities are noted. Within this context the Council highlights that the new Local Plan must be read and considered in its entirety.	No further action required in relation to the new Local Plan.

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							<p>employment floorspace. We note that the site allocation has reduced from the 255 residential units previously identified in the March 2020 draft Local Plan (which was not consulted on).</p> <p>The Site Allocation Background Paper (January 2021) which underpins the draft Local Plan identifies that the indicative capacities should not be read prescriptively and the actual development capacity of a site will need to be established through detailed design. Indicative site capacities are based on either existing planning consents, pre-application stage proposals, masterplan studies or SHLAA density assumptions (taking account of sensitivity assumptions on heritage assets for example). On LSIS co-location sites, a general assumption of 33% employment floorspace and 67% residential uses is suggested. Appendix A of the Site Allocation Background Paper outlines that for Lower Creekside LSIS the standard method (SHLAA) plus sensitivity analysis was undertaken to establish the 160 residential unit capacity.</p> <p>We consider that in accordance with the SHLAA density assumptions, a site within an Opportunity Area with a PTAL of 4-6 could accommodate up to 355 homes (within an Urban location). Whilst we acknowledge that there are heritage sensitivities within Lower Creekside, we consider that the indicative development capacity of 160 new homes is significantly lower than what could reasonably be delivered through the redevelopment of Lower Creekside taking a design-led approach to site optimisation.</p> <p>This position is evidenced through pre-application design development at 5-9 Creekside and neighbouring 2 and 3 Creekside sites which indicates that the site allocation may have a greater site capacity, taking into account heritage, townscape, environmental and technical considerations. In addition given that the development at 1 Creekside (LBL ref; DC/18/106708) was approved at a density of 350 units per hectare (with a site area of 0.1ha), the indicative development capacity of 160 residential units across the 1.1ha is significantly lower than what could reasonably be delivered through the redevelopment of Lower Creekside taking a design led approach. As such we do not consider this aspect of the allocation has been positively prepared, and it is requested that the indicative development capacity is increased, or it is made clear that the figure provided is in no way a cap on development potential.</p> <p>Site Allocation (paragraph 15.98) The site is allocated for comprehensive employment led redevelopment. Co-location</p>	<p>The development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>The Council acknowledges and reiterates that development proposals for site allocations should be considered on a “site by site” basis. The site-specific master planning and/ or design-led approach required by the new Local Plan provides an appropriate and sound mechanism to do so.</p> <p>For further clarity, the indicative development capacities identified for the site allocation provide a starting point for the decision-taking process, which provides an appropriate platform for the detailed assessment of what may comprise optimal development. In this respect, the Council welcomes the work being undertaken by the respondent.</p> <p>The Council concludes that the new Local Plan’s master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p>	

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							<p>of compatible commercial, residential and complementary uses are supported within the current drafting. The Owners and Developers request that the proposed co-location uses also include PBSA, which is considered to be suitable in this location, subject to complying with London Plan Policy H15 and draft Local Plan Policy HO7.</p> <p>Opportunities (paragraph 15.99) The Owners and Developers of 5-9 Creekside support the opportunities provided in draft paragraph 15.89, and reference to the site being located in the Deptford Creek / Greenwich Avison Young (UK) Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS 12 Riverside Opportunity Area, as this is envisaged to provide new jobs and homes through the plan period.</p> <p>Development requirements (paragraph 15.100) The Owners and Developers of 5-9 Creekside support the development requirements to not reduce industrial capacity or compromise the functional integrity of the employment location. The emerging development proposals seek to deliver new active frontages along Creekside which is also supported in this section of the allocation. We do however question the requirement that development must be delivered in accordance with a masterplan to ensure the appropriate co-location of employment and other uses across the site. We would note that this is contrary to draft Policy EC6, where supporting paragraph 8.35 recognises that site allocation policies have been prepared for co-location LSIS sites to ensure that co-location is coordinated and appropriately managed through the masterplan process. We suggest that point 1 of paragraph 15.100 is amended for consistency with draft Policy EC6, noting that the site allocation policies have already coordinated co-location through the masterplan process. Furthermore, the principle of mixed use development on the sites is already secured via the Site Allocation, and we consider the nature of the area and existing uses does not require a masterplan to be approved in order for the aspirations of the site allocation to be realised.</p> <p>Development guidelines (paragraph 15.91) We agree that non-employment uses, including residential uses, must be sensitively integrated into the development through considering operational requirements of future employment uses. The Developers consider the 5-9 Creekside site is suitable to accommodate new workspace including artist studios and other SME accommodation. We understand that building</p>		

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							heights will need to be designed having regard to designated and non-designated heritage assets, including St Paul's Church, Deptford Church Street, the Crossfields Estate and the Deptford Creek Conservation Area (and as such will be assessed against the relevant heritage legislation and policies as considered in further detail earlier in this letter). We support that new developments should be designed having regard to the character and amenity of the Trinity Laban Centre, the Faircharm site, the buildings opposite the Creek in Greenwich, development at the former Tidemill School and the elevated DLR. We request that the development currently under construction at 1 Creekside (which forms part of the site allocation) is also added to the list of buildings which should be considered as part of the emerging character of the area, particularly as it has now been substantially completed on site. The development at 1 Creekside establishes a number of design principles which will inform the design approach for other sites within Site Allocation 17, including height and massing.		
CON054	REP303	Avison Young OBO Laurence Cohen, Melanie Curtis, CA Ventures and Fifth State			3	LNA SA 17	Summary The Owners and Developers of 5-9 Creekside are supportive of the direction of the draft Local Plan and look forward to working with the Borough to deliver regeneration within Creekside, as per the site allocation. However we request that PBSA is included within the proposed development uses. Notwithstanding this and based on our current assessment, we consider that the proposed indicative site capacity may be overly restrictive and so we question whether the allocation has been positively prepared in accordance with the requirements of the NPPF. We consider that the indicative site capacity is not supported by proportionate evidence and therefore does not seek to meet the area's objectively assessed needs. Indeed the design work that has been prepared by the Developers in conjunction with other landowners and development plots adjacent to 5-9 confirms that the overall capacity of Lower Creekside has potential to be higher than proposed in the policy wording. We would therefore suggest that the recommendations set out in these representations should be carefully considered and incorporated into the proposed policy wording in order for the allocation policy to be found sound. We reserve the right to make further comments in relation to the policy allocation at the next available opportunity. Additionally, we consider there to be some elements of the draft plan which require further modifications in order for the plan to be sound found, including: – Introducing policy wording to positively promote the optimisation of the capacity of sites, including site allocations, and higher density developments in well	The Council notes DP9's concluding comments. The Council's response to the matters raised can be found above.	No further action required in relation to the new Local Plan.

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							<p>connected locations in accordance with the NPPF and the London Plan; – Including the consideration of emerging context and site optimisation to assess and determine appropriate building heights, and setting out clear parameters where exceedances of the height ranges expressed in Policy QD4 could be acceptable, to ensure the most efficient use of land in accordance with the NPPF and the London Plan; – Redrafting of heritage policies to ensure that they have consideration for replacement proposals, the balancing exercise and the public benefits of development in accordance with the key tests set out the NPPF; – Additional assessment as to the need for student housing in the Borough, including quantification of the student housing required to relieve pressure on the private sector rental market and meet existing and future needs, to ensure the objective needs of the borough have been properly assessed and the plan has been positively prepared; – Further consideration of the drafting of policies and supporting text as there are key policy drivers included in supporting text rather than within the policy wording itself, i.e. that the affordable housing fast track route set out in the London Plan applies to PBSA development; – Providing a greater degree of flexibility within policy, i.e. the provision of affordable workspace which should have regard for the extent of public benefit delivery achieved through a higher proportion of floorspace provided at lower discount rates and the employment land profile in the immediate area, and workplace training contributions, which should have regard for the nature of development, social impact strategies and private partnerships and commitments; and – Ensuring that key terms are parameters more clearly defined, i.e. the replacement of ‘low cost’ with ‘affordable’ in draft policy EC4 and that a masterplan approach is not required for site allocations.</p> <p>Next Steps We thank you for the opportunity to be involved in the on-going preparation of the Lewisham Local Plan and trust that our representations are helpful when preparing the next version of the Local Plan. The Owners and Developers of 5-9 Creekside are very keen to engage with LBL and wish to continue to be involved in subsequent consultations.</p>		
CON056	REP304	APT Studio	Richard	Gigg	3	LNA SA 17	<p>I have a few concerns with regards to the proposed Local plan for Creekside, I work from the above address 4 days a week and do require access for loading unloading equipment into the yard at the double steel gates at the corner of 6 Creekside, I as well as the majority of studio members (who number 42 in total) need this on occasion so is in very regular use.</p>	The Council notes APT Studio’s comments regarding Creekside. These comments are detailed matters beyond the scope of the Plan. Car parking, access, design in-keeping with the area’s identity, street furniture and affordable housing are matters that will be dealt with at the planning application stage.	No further action required in relation to the new Local Plan.

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							<p>Any street furniture around this area would greatly impede delivery and pick up of large Artwork, so this area does really need to be clear of signage and furniture, it also serves often as a passing place for larger vehicles and I would think still form this function because of the turning circle.</p> <p>Can the number of free parking spaces remain the same, any allocated spaces could be extra, but this is again to support local business and residents, it would be good to retain some idea of a 'working' street co-existing alongside its residents. Is it possible just to mend and make good rather than the general 'modern' look which is at odds with the character of the area which has such a rich history, it feels like it may be sterilizing the area, improvements are needed so I'm fully behind the intention here, but I think it could be done in a more sympathetic manner, and the street to keep its distinctive feel,</p> <p>Although not directly mentioned in this proposal, the proposed development at 5-9 Creekside is a example of an unsympathetic building, I fully appreciate housing is required but this could be on any generic modern street, whilst supporting only 35% 'affordable housing' this should be entirely affordable housing.</p> <p>APT has been at 6 Creekside since 1995, and maintains and looks after the historic buildings their and grounds, as the stated and shared aim is to both retain and look after the unique industrial and cultural heritage of this specific area, it's very important that it can retain as much of its identity as possible.</p>		
CON057	REP305	Savills OBO Bellway Homes ltd			3	General LNA SA 18	<p>REPRESENTATIONS SUBMITTED ON BEHALF OF BELLWAY HOMES LTD AND PEABODY DEVELOPMENTS LTD</p> <p>We are instructed by our clients – Bellway Homes Ltd (“Bellway”) and Peabody Developments Ltd (“Peabody”) to submit representations to the following document: “Lewisham Local Plan. An Open Lewisham as part of an Open London”. Proposed submission document – Regulation 19 stage” dated January 2023 (“the draft Local Plan”) in the context of their land ownership and planning application at Sun Wharf, Creekside, Deptford, London, SE8 3DZ (“the site”), located within the London Borough of Lewisham (LBL).</p> <p>These representations relate to the site at Sun Wharf which forms part of the proposed site allocation ‘18: Sun Wharf Mixed-use Employment Location (including Network Rail Arches)’ within the draft Local Plan. The site is outlined in red in the attached site plan (Drawing No. 3336A-PL(90)_00_P01).</p>	<p>The Council notes the general, introductory, and contextual comments made in relation to the new Local Plan Policy LNA SA 18 Sun Wharf Mixed-Use Employment Location (including Network Rail Arches).</p> <p>The Council notes and welcomes the strong in-principal support offered in relation to this site allocation.</p>	No further action required in relation to the new Local Plan.

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							<p>These representations also relate to the wider policies of the draft Local Plan.</p> <p>The site has significant redevelopment potential and we strongly support the principle of the site allocation and the principle of development to deliver a mixed use redevelopment comprising new residential uses, including affordable housing and provision of high quality employment uses. We have set out our detailed comments in this letter.</p> <p>This letter should be read in conjunction with the previous representations (letter dated 09 April 2021) submitted to the Council in response to the Lewisham Local Plan Regulation 18 'Main Issues and Preferred Approaches Document' January 2021 and representations (letter dated 10 June 2022) submitted to the Council in response to "Lewisham Tall Buildings Study Addendum" May 2022.</p> <p>Background Bellway Homes Ltd and Peabody Developments Ltd Bellway is a major national house-builder, with considerable expertise in delivering homes that people want to live in. Bellway is committed to developing the site who have a track record of working in some of London's key regeneration areas. Bellway has delivered high quality mixed use redevelopment schemes within London and the South East. Bellway has established a particularly strong track record in London and deliver over 2,500 units per year across four divisions. Bellway Thames Gateway alone currently has over 30 active development sites. Whilst many in the development sector have been in financial difficulty in recent years, Bellway have emerged as a strong and well-run business with low debt.</p> <p>Peabody Developments Ltd are a wholly owned subsidiary of Peabody Trust. Peabody are a not for profit housing association who provide over 104,000 homes and services to 220,000 residents across London and the Home Counties. Peabody also provide care and support services for around 20,000 customers. Peabody are committed to making sure our homes are affordable and comfortable for everyone. Peabody keep rents low and aim to provide our communities with services and support that give everyone a platform to succeed.</p> <p>Bellway and Peabody formed a joint venture partnership to deliver the proposed redevelopment scheme at Sun Wharf.</p> <p>Site and Surroundings The site measures approximately 0.73 hectares and is located in the northern part of Deptford. The site accommodates existing low-rise warehouse buildings</p>		

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							<p>currently in commercial use. The site is bound by Creekside (a local vehicle carriageway) and Cockpit Arts (a creative industries business incubator) to the west, railway arches to the south, Deptford Creek to the east, and Kent Wharf to the north.</p> <p>Kent Wharf is a mixed use scheme, also redeveloped by Bellway that has been completed and comprises 143 residential units and circa 1,300sqm of commercial floorspace. The site predominantly has a Public Transport Accessibility Level (PTAL) rating between 3 and 4 (moderate to good). However the site is better than the standard PTAL rating suggests since it is in close proximity to areas of PTAL 6a and is within walking distance to additional station and bus services.</p> <p>The Environment Agency's Flood Map for Planning indicates that the site is situated within Flood Zone 3, within an area benefiting from flood defences.</p> <p>Planning Policy Context The site is subject to the following key adopted (current) planning policy designations:</p> <ul style="list-style-type: none"> • Part of Site Allocation SA11 "Sun and Kent Wharf Mixed use Employment Location"; • Deptford Creek/Greenwich Riverside Opportunity Area as designated by the London Plan; • Deptford and New Cross Creative Enterprise Zone as designated by the London Plan; • Deptford Creekside Regeneration and Growth Area; • Air Quality Management Area; and • Archaeological Priority Area. <p>Current Planning Application Bellway and Peabody submitted a full planning application (ref: DC/20/118229) for a residential-led, mixed use redevelopment at Sun Wharf proposing 220 homes and creative industry commercial uses together with the delivery of new public realm, play space and landscaping which would deliver on a range of planning and public benefits, including 39% affordable housing (by habitable room) and affordable workspace.</p> <p>The description of development is as follows: "Demolition of all existing buildings and comprehensive redevelopment to provide 3 new buildings ranging in heights of 3 to 19 storeys to provide 220 residential units (C3 Use Class) and 1,132 sqm of commercial floorspace (Use Class E) plus 311sqm of commercial floorspace (Use Class E) in a container building, together with associated wheelchair accessible vehicle parking,</p>		

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							<p>cycle parking, landscaping, play areas, public realm, improvements to river wall and public riverside walkway and associated works.</p> <p>On 1 September 2022, LBL's Strategic Planning Committee resolved to grant planning permission. On 3 April 2023, the Mayor of London issued his Stage 2 referral (planning report 2020/6879/S2) stating that the application is acceptable in strategic planning terms and there are no sound planning reasons for the Mayor to intervene in this case, recommending LBL determine the case itself. A decision notice and Section 106 is due to be formally issued imminently.</p> <p>National Planning Policy Context Paragraph 35 of the NPPF (National Planning Policy Framework) (2021) states that Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. Plans are 'sound' if they are:</p> <p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.</p> <p>These tests of soundness should also be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies of the area.</p> <p>Lewisham Draft Local Plan (Regulation 19) – dated January 2023</p> <p>We note that the key principles of the adopted Site Allocation is being carried over to the draft Site Allocation as set out in the draft Local Plan.</p> <p>We note the site is subject to the following key draft planning policy designations:</p>		

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							<ul style="list-style-type: none"> • Site Allocation 18: Sun Wharf Mixed-use Employment Location (including Network Rail Arches); • Deptford Creek/Greenwich Riverside Opportunity Area (as designated by the London Plan); • Appropriate Location for Tall Buildings (Deptford Creekside tall building suitability zone); • Mixed-Use Employment Location; • Deptford and New Cross Creative Enterprise Zone (as designated by the London Plan); • Deptford Creekside Cultural Quarter; • Waterlink Way; • Archaeological Priority Area; • Air Quality Management Area; and • Flood Zone 3. <p>Having regards to the national planning context in preparing Local Plans, we have commented on the draft Local Plan, as explained below. For any specific suggested amendments, this is shown via a box, with the relevant reference to the draft Local Plan accordingly, as follows:</p> <div> <p><i>Suggested amendments to draft Local Plan re: [reference inserted]</i></p> <p>Deletions shown as strikethrough-text-in-red; and Additions shown as <u>underlined text in green</u>.</p> </div>		
CON057	REP306	Savills OBO Bellway Homes Ltd				LNA SA 18	<p>Draft Site Allocation 18: Sun Wharf Mixed-use Employment Location (including Network Rail Arches) (“draft Site Allocation 18”)</p> <p>Fundamentally, our Client fully supports the principle of re-development for residential and employment/commercial uses as part of the draft Site Allocation 18 (pp588-591).</p> <p>However, further corrections, clarifications and updates are required, as set out below. Compared to the adopted Site Allocation (SA11), we note that the draft Site Allocation boundary has been amended to omit Kent Wharf. We have concluded this is likely to be because Kent Wharf has been redeveloped (by Bellway) and is now completed and occupied. We note that the updated boundary for the draft Site Allocation therefore includes the remaining land parcels: the Site (i.e. Sun Wharf), as well as the adjacent Cockpit Arts site and Network Rail Arches. The site address should be updated to include “Sun Wharf” as noted below.</p> <p>However, it is fundamental that the draft Site Allocation have regard to the masterplan that was developed and approved as part of the Kent Wharf planning application i.e. the Indicative Masterplan document approved as per condition 2 (ref: DC/14/89953 dated 17 June 2015). This approved masterplan</p>	<p>The Council welcomes the full support offered in relation to the new Local Plan Policy LNA SA 18 Sun Wharf Mixed-Use Employment Location (including Network Rail Arches).</p> <p>The Council remains committed to working with development partners to facilitate the delivery of planned-for growth across the Borough – inclusive of meeting the housing, employment, town centre, retail, and infrastructure network needs of residents and communities. The Council considers that the new Local Plan, through its spatial strategy, site allocations and planning policies provides a sound platform for securing this objective – both through plan-making and decision-taking.</p> <p>Site Address The Council welcomes the clarification on the site address details. The Council can consider this as a minor modification that can be proposed upon submission for examination.</p>	<p>Site Address Suggest that the Council consider identifying a minor modification to the site address as part of the Submission process –</p> <p><i>“Cockpit Arts Centre and Sun Wharf ...”</i></p> <p>PTAL Accessibility Rating Subject to the confirmation of fact, consider amendment to Policy LNA SA 18 Site Details PTAL Ratings –</p> <p>3 - 4</p> <p>Delivery of Cycleways Suggest that the Council consider an amendment to the text at Paragraph 15.105 5 to ensure that the development requirements are reasonable and proportionate. The suggested amendment at Paragraph 15.105 –</p>

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							<p>was in relation to the Kent Wharf, Sun Wharf, Cockpit Arts and Network Rail Arches land parcels. Kent Wharf was therefore the first phase, with Sun Wharf now forming the second phase of the development, and Cockpit Arts and Network Rail Arches as the future subsequent phases. Therefore, the draft Site Allocation should be updated to reference this approved masterplan as noted below.</p> <p>As part of the “Indicative Development Capacity” section of the draft Local Plan, we note that it states 220 net residential units and 1,443 gross non-residential floorspace (p588) makes it clear the latter is gross floorspace sqm). It is also noted these figures reflect the current submitted application which have been developed via a design-led approach. We note that para 13.8 (p437) states these site capacities are indicative only with the optimal capacity established on a case by case basis – which we support.</p> <p>Table 13.1 (p437) provides the indicative delivery number for all site allocations over the 20 year plan period, which includes homes (net units). However, we consider that the drafting should be further refined to make it explicit that the figure for the residential units is a minimum requirement, and indeed a only the starting point, as noted further below. This would ensure that the draft Local Plan is effective in its delivery of new homes, as well as affordable homes.</p> <p>We note that the PTAL states between 0 to 3. However, LBL’s Strategic Planning Committee report in relation to the Sun Wharf planning application (ref: DC/20/118229) confirms the PTAL is 3 to 4 (paras 43, 163 and 465). Fundamentally the site has a better than the standard PTAL rating, since it is in close proximity to areas of PTAL 6a and is within walking distance to additional station and bus services and also the Deptford Town Centre. Therefore, we would consider the text in the draft Local Plan should be updated to “PTAL 3 to 4” as noted below. This would ensure it is consistent and factually correct.</p> <div><p>Suggested amendments to draft Local Plan re: Site Allocation 18, table on p588</p><p>SITE ADDRESS: “Cockpit Arts Centre, 18-22 Creekside, Sun Wharf London SE8 3DZ</p><p>PTAL</p><table><tr><td>2015:</td><td>0-3</td><td>3-4</td></tr><tr><td>2021:</td><td>0-3</td><td>3-4</td></tr><tr><td>2031:</td><td>0-3</td><td>3-4</td></tr></table></div> <p>For the reasons explained above, under the sub-heading Development requirements (para 15.105) part 1 should be updated as follows:</p>	2015:	0-3	3-4	2021:	0-3	3-4	2031:	0-3	3-4	<p>Approved Masterplan The Council notes the comments and the suggested amendment to include reference to an early masterplan – prepared over eight years ago. The Council considers that whilst this historic master plan may help to contextually inform future further master planning and design-led approaches to place-making, it is no-longer current and up to date. For that reason, the Council maintains the policy is sound in its current form.</p> <p>Indicative Development Capacity Comments made in relation to the site allocations possible development capacities are noted. Within this context the Council highlights that the new Local Plan must be read and considered in its entirety.</p> <p>The development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities. It is acknowledged that these may justify a higher development capacity than that identified by the indicative capacity figure.</p> <p>The Council acknowledges and reiterates that development proposals for site allocations should be considered on a “site by site” basis. The site-specific master planning and/ or design-led approach required by the new Local Plan provides an</p>	<p>“5. The site must be fully re-integrated with the surrounding street network to improve access and permeability. The site must also facilitate make a proportionate contribution towards the delivery of Cycleway 10 which runs over Ha’penny Bridge and Cycleway 35 running along Creekside.”</p> <p>Safeguarding of Brewery Wharf Suggest that the Council consider a minor modification to the wording at Paragraph 15.106 6 –</p> <p>“The proposed residential development located in close proximity adjacent to the safeguarded Brewery Wharf (located to the north east) should be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, in line with the Agent of Change principle.”</p>
2015:	0-3	3-4																
2021:	0-3	3-4																
2031:	0-3	3-4																

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							<p><i>Suggested amendments to draft Local Plan re: Site Allocation 18, para 15.105, Development requirements, No.1 (p589)</i></p> <p>Landowners should work in partnership and development must be delivered to ensure coordination, phasing and balance of uses across the site including the Cockpit Arts Centre and Sun Wharf parcels of land, in line with Policy DM3 (Masterplans and comprehensive development), <u>and having regards to the approved Indicative Masterplan document (Kent Wharf, Condition 2 Planning Permission, ref: DC/14/89953 dated 17 June 2015).</u></p> <p>Under the sub-heading Development requirements (para 15.105) we note that part 5 states that: “The site [i.e. site allocation] must be fully re-integrated with the surrounding street network to improve access [sic] and permeability. The site must also facilitate the delivery of Cycleway 10 which runs over Ha’penny Bridge and Cycleway 35 running along Creekside.” Both of these cycle routes fall outside of, and have an extensive reach beyond the site, and the draft Site Allocation boundary. Whilst the principle of improved access to these cycleway routes is generally supported, it is unreasonable to require a draft site allocation “to facilitate the delivery” of both these cycleways, and would not be effective and would not be justified, contrary to the NPPF. The appropriate planning mechanism in which to address the relevant planning obligations is applying the relevant statutory tests set out in Regulation 1221 . We would therefore suggest the following amendments which would seek to promote future redevelopment to be designed so that they promote connections with the surrounding street network, including the cycleways:</p> <p><i>Suggested amendments to draft Local Plan re: Site Allocation 18, para 15.105, Development requirements, No.5 (p589)</i></p> <p>The site must be fully re-integrated with the surrounding street network to improve access [sic] and permeability. The site must also facilitate the delivery of Cycleway 10 which runs over Ha’penny Bridge and Cycleway 35 running along Creekside.</p> <p><u>The design of development proposals should seek to promote appropriate connections to the surrounding street network, including potential connections to Cycleway 10 (which runs over Ha’penny Bridge) and Cycleway 35 (running along Creekside).</u></p> <p>Under the sub-heading Development requirements (para 15.105) we note that part 8 refers to protecting and enhancing green infrastructure relating and this is supported in principle. However, this must be balanced against the Environment Agency requirements and the need to protect against flood risk. We therefore suggest this is made explicit, as per the suggestion below.</p> <p><i>Suggested amendments to draft Local Plan re: Site Allocation 18, para 15.105, Development requirements, No.8 (p590)</i></p> <p><u>Development proposals must protect and seek to enhance green infrastructure, the intertidal terrace, the sand martin bank at Deptford Creek and the SINC at Creekside Discovery Centre, The Creek and at Sue Godfrey Park – and balanced against any requirements from Environment Agency needed to mitigate against flood risk.</u></p> <p>Under the sub-heading Development guidelines (para 15.106) we note that part 5, support the principle of tall buildings. As it</p>	<p>appropriate and sound mechanism to do so.</p> <p>For further clarity, the indicative development capacities identified for the site allocation provide a starting point for the decision-taking process, which provides an appropriate platform for the detailed assessment of what may comprise optimal development. In this respect, the Council welcomes the work being undertaken by the respondent.</p> <p>The Council concludes that the new Local Plan’s master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p> <p>PTAL Accessibility Rating The comments made in relation to the site allocation’s PTAL rating and overall accessibility are noted. Subject to the factual status being confirmed, the Council could consider amendments to the policy text through a minor modification that can be proposed upon submission for examination.</p> <p>Delivery of Cycleways The comments made in relation to the development requirement that comprehensive redevelopment facilitate the delivery of Cycleways 10 and 35 are noted. The Council acknowledges that the current wording of Paragraph 15.105 5 may present an unreasonable requirement upon development partners. Subject to it being demonstrably necessary to ensure soundness, an amended policy wording could be introduced as a main modification.</p> <p>Tall New Buildings</p>	

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							<p>relates to the text that tall building elements should be located to the south east corner of the site marking the junction of Creek and the railway viaduct, whilst this is reflective of the current planning application it is considered that the policy text is overly prescriptive and should be amended to ensure it is more flexibly drafted i.e. it should simply say that tall buildings and their precise location will be a design-led approach. This will ensure there is sufficient flexibility in the publication Local Plan and that the site is deliverable, and would therefore be effective.</p> <div> <p><small>Suggested amendments to draft Local Plan re: Site Allocation 18, para 15.106, Development guidelines, No.5 (p590)</small></p> <p><small>The potential for taller building elements to reflect the surroundings should be considered as part of a design led approach, and should ensure minimal impact on the Grade II listed railway viaduct and the Lifting Bridge Structure as well as the setting of the Grade I Listed St Paul's Church in Deptford and the LVMF panoramic view from Blackheath Point. <i>The precise location for taller elements should be informed by a design-led approach located in the south-eastern corner of the site, marking the junction of Creek and the railway viaduct.</i></small></p> </div> <p>Under the sub-heading Development guidelines (para 15.106) we note that part 6, there is reference the safeguarded Brewery Wharf. We note that LBL's Strategic Planning Committee report (dated 1 September 2022) in relation to the Sun Wharf planning application (ref: DC/20/118229) did not view the site being in 'close proximity' to Brewery Wharf as the report (para 243 p41) states 'the development site lies some distance away from Brewery Wharf' with the Wharf located approximately 285m to the north east of the application site. Therefore, we consider that drafting be amended as follows.</p> <div> <p><small>Suggested amendments to draft Local Plan re: Site Allocation 18, para 15.106, Development guidelines, No.6 (p590)</small></p> <p><small><i>The proposed residential development located in close proximity to the Regard should be had to the safeguarded Brewery Wharf (located approximately 285m to the north east of the site), and proposed residential development should be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, in line with the Agent of Change principle.</i></small></p> </div> <p>In summary, the suggested changes to the draft Site Allocation would ensure there is sufficient flexibility and that the site is deliverable, and would therefore be effective.</p> <p>Public Examination On behalf of our Client we consider it is necessary we attend the oral part of the Examination in Public. We would be grateful if you could keep us updated.</p> <p>Conclusion In summary, our Client supports the principle of the Site Allocation 18 for the redevelopment of the site which would provide significant public benefits including employment and new housing. With the suggested amendments we consider that the draft Local Plan would be sound. However, some of</p>	<p>The comments made in relation to the development guidelines set out under Paragraph 15.106 5 are noted – specifically those relating to the locations where taller elements of future development should be located/ directed.</p> <p>For clarity, the new Local Plan sets out a justified approach for the consideration of development proposals incorporating tall new buildings under Policy QD 04 Building heights. The approach identifies locations where proposals for tall new buildings may be positively considered. This is set out under associated Figure 5.1 Tall Buildings suitability plan. Paragraph 5.33 expands upon this approach and states –</p> <p><i>“...This must be read together with part C of the policy above which provides the recommended maximum building heights. The zones and heights have been informed by the Lewisham Characterisation Study (2019), Lewisham Tall Buildings Study (2020) and Tall Buildings Study Addendum (2022). Whilst Suitability Zones have been identified this does not mean that tall buildings are automatically acceptable within them or that the maximum building heights are appropriate in every instance. Although maximum heights are provided for each for the Tall Building Suitability Zones, proposals will still be expected to include robust design justifications for the heights proposed, including testing in key views.”</i></p> <p>The site allocation at the Sun Wharf Mixed-Use Employment Location (including Network Rail Arches) lies the Deptford Creekside area and is further informed by Figure 5.4 Deptford Creekside tall building suitability zones.</p> <p>The Council considers that the approach set out in the new Local Plan is justified and effective and provides development</p>	

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							the items noted above in their current form would constrain potential redevelopment options and would therefore, not be effective in their delivery and would not be consistent with national policy. Therefore, it is considered that the draft Local Plan is not sound.	partners with the guidance and direction necessary to secure sustainable development and successful place-making. Safeguarding of Brewery Wharf The comments made in relation to the geographic proximity, or otherwise, of the Brewery Wharf site, are noted. Subject to an amendment being demonstrably necessary to ensure soundness, a change to reflect the factual position could be introduced by the Council as a minor modification.	
CON057	REP307	Savills OBO Bellway Homes Ltd			2	EC 04	Draft Policy EC4 Low Cost and Affordable Workspace We note the approach in para 8.24 that states “all major commercial development, including mixed-use developments with a commercial component of 1,000 square metres or more gross, must ensure that 10 per cent of new workspace is delivered as affordable workspace”. Whilst our Client supports the approach that this would be subject to viability. With regard to the formula for affordable workspace payments in lieu set out in Table 8.2, this must also be subject to viability.	The Council notes and welcomes the support offered in relation to the new Local Plan Policy EC 04 Low-cost and affordable workspace. The provision of affordable employment floorspace and premises continues to be a critical component of the Council’s strategy for growth and place-shaping across the Borough. The Council remains committed to working with development partners to achieve this important objective. The comments made in relation to viability are noted. This is a familiar matter – and could conceivably be raised against several key development requirements necessary for successful place-shaping. The Council considers that there is sufficient flexibility existing within our national planning system to allow development partners to justify possible divergence when the circumstances dictate.	No further action required in relation to the new Local Plan.
CON057	REP308	Savills OBO Bellway Homes Ltd			2	EC 07	Draft Policy EC7 Mixed-use Employment Locations (MEL) Our Client supports the principle mixed use redevelopment of MELs and Site Allocations within MELs through the masterplan process as outlined in Part A and Part B. However, the policy should make a more explicit reference to residential uses to be included as part of regeneration, as noted below. We note Part C of the draft policy seeks the long term protection of industrial capacity on MELs, ensuring there is no net loss of existing industrial capacity. This is not consistent with London Plan Policy E4 (Land for industry, logistics and	The Council welcomes the support offered in relation to the new Local Plan Policy EC 07 Mixed use employment locations (MELs). Regeneration through housing The comment suggesting that the policy makes more explicit reference to the role of residential uses as a vehicle for regeneration on the sites identified as Mixed-Use Employment Locations is noted.	No further action required in relation to the new Local Plan.

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							<p>services to support London’s economic function) as Part C of that policy states ‘the retention, enhancement and provision of additional industrial capacity across the three categories of industrial land set out in Part B [of London Plan Policy E4] should be planned, monitored and managed’.</p> <p>Whilst the site vacancy is scored as low in the Lewisham Employment Land Study (2019) with regard to Sun and Kent Wharf it states at para (5.60 p 51) "If the current occupiers vacate the site it may be difficult to find a new occupier due to the constrained nature of the access and poor site coverage". The policy as its currently drafted does not allow for the site to be managed effectively to address possible vacancy issues in the future.</p> <p>Additionally, para 22 of the NPPF states that long-term protection of sites for employment uses should be avoided where there is no reasonable prospect of the site being used for allocated employment uses. Therefore, it would not be reasonable to include this, and should be omitted. We therefore suggest the following amendments:</p> <div data-bbox="1113 989 1768 1302" data-label="Text"> <p><i>Suggested amendments to draft Local Plan re: EC7 Mixed-use Employment Locations (MEL), Parts A and C, p233</i></p> <p><i>A. The comprehensive redevelopment of Mixed-use Employment Locations will be supported in order to facilitate their renewal and regeneration (which may include residential uses) and to secure provision for a range of commercial uses, including new modern workspace with priority given to Class E(g) office and light industrial uses. All development proposals within MELs must be delivered in accordance with relevant site allocation policies and a site-wide masterplan. Development proposals must provide demonstrable improvements in the overall physical and environmental quality of the MEL and ensure that new development is well integrated with adjoining and neighbouring land uses.</i></p> <p><i>[...]</i></p> <p><i>C-Where the comprehensive development of an MEL, or a site within the MEL, has been delivered through the masterplan process all future proposals involving the redevelopment or change of use of land and floorspace must:</i></p> <p><i>a. Retain, and wherever possible seek to increase, the proportion of industrial capacity across the MEL, as originally approved in the masterplan and planning consent; and</i></p> <p><i>b. Ensure there is no net loss of existing industrial capacity.</i></p> </div> <p>Making these changes would ensure that the draft Local Plan is consistent with regional and national policy and effective in its delivery.</p>	<p>For clarity, the policy already clearly states that these will be regenerated through comprehensive mixed-use redevelopment. Those sites that are subject to corresponding site allocations, including LNA SA 18 Sun Wharf Mixed-Use Employment Location, are also clear in that intent. Consequently, the suggested change to the policy wording is unnecessary to ensure soundness.</p> <p>Meeting Industrial Demand The comment made in relation to national policy, and how it speaks to the long-term protection of sites for employment purposes is noted.</p> <p>For clarity, the Mixed-Use Employment Locations are comprised of large sites that have historically solely provided industrial land provision. The Council acknowledges that the demand for industrial land in Lewisham and across London is evolving. This is recognised by the new Local Plan and the London Plan, with which the former seeks general conformity (in this case London Plan Policies E2 and E4).</p> <p>The Greater London Authority has recently published data that demonstrates that demand for employment floorspace – specifically for B8 provision remains high. The Council considers that the identified and allocated Mixed-Use Employment Location provide suitable and appropriate opportunities that are deliverable and developable to meet demand over the plan period. The Council highlights that there is no evidence to suggest that is not the case.</p>	
CON057	REP309	Savills OBO Bellway Homes Ltd			2	HO 01	<p>Draft Policy HO1 Meeting Lewisham’s Housing Needs; and Draft Appendix 6 Housing Trajectory and Give Year Housing Land Supply</p> <p>Our Client is fully supportive of Site Allocation 18 providing new homes (C3).</p> <p>Our Client fully supports Policy HO1, noting the relevant reference to the London Plan Table 4.1 which sets out a</p>	<p>The Council welcomes the support offered in relation to the new Local Plan Policy HO 01 Meeting Lewisham’s housing needs.</p> <p>The Council remains committed to working with development partners to secure the delivery of planned-for growth and supporting infrastructure during the plan-period.</p>	<p>No further action required in relation to the new Local Plan.</p> <p>Suggest that the Council takes note of the suggested housing delivery trajectory and use it as the basis for a SoCG with the development partner.</p>

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							<p>minimum 10 year housing target for Lewisham. This sets out that the Council will ensure the London Plan ten year housing target is exceeded. It is important to note the Lewisham SHMA 2022 indicates (para 5.16 p 84) a higher housing need for Lewisham of 2,334 per annum over a 10 year period (2021 to 2031).</p> <p>This site represents a significant opportunity for mixed use development that can contribute towards housing provision and the above housing targets.</p> <p>We also note an up to date housing trajectory and five year housing supply for the Borough with inclusion of Site Allocation 18. Sun Wharf is listed in North Area (No.18) with a site area of 1 hectare (we note this relates to the entire site allocation, not just Sun Wharf), noting that:</p> <ul style="list-style-type: none"> • For Year 4 (2026/27) 180 units would be delivered/completed; and • For Year 5 (2027/28) 40 units would be delivered/completed. <p>Our Client fully supports Parts D, E and F that aim to provide a mix of unit sizes and housing choice on a case by case basis. We acknowledge Table 7.1 (Target unit size mix for affordable housing) which sets specific targets on affordable products to ensure stronger requirements for family housing.</p> <p>Our Client is supportive of the need to deliver a range of housing types. We note that Lewisham's SHMA 2022 in (paragraph C.12 p 144) with regard to open-market housing outlines flexibility (to meet changing needs over time) as one of the current limitations of the housing market in Lewisham from surveyed stakeholders. Therefore, it is essential that an appropriate mix of housing is established on a case-by-case basis.</p>		
CON057	REP3010	Savills OBO Bellway Homes Ltd				HO 03	<p>Draft Policy HO3 Genuinely Affordable Housing Our Client strongly advocates for the delivery of new affordable homes to meet Lewisham's housing requirements.</p> <p>We acknowledge and support the Council's threshold approach to viability in accordance with the London Plan Policy H5 and the principle of increased affordable housing, and for new homes to be genuinely affordable, subject to viability.</p> <p>We support Part F (Threshold approach to viability) and Part G (Viability Tested Route) that ensure conformity and consistency with the London Plan and the Affordable Housing and Viability Supplementary Planning Guidance.</p>	<p>The Council welcomes the support offered in relation to the new Local Plan Policy HO 03 Genuinely affordable housing.</p> <p>The Council remains committed to working with development partners to secure the optimal delivery of genuinely affordable housing to meet the needs of existing and future residents.</p>	No further action required in relation to the new Local Plan.

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							<p>The site represents a key opportunity for the delivery of a mixed use redevelopment brought forward by our clients to contribute towards affordable housing.</p> <p>We also note that Part K may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis.</p> <p>Our Client is supportive of the need to deliver a range of housing types that promote inclusive and mixed communities and advocates for policies that adopt a flexible approach to housing mix. This will ensure that the draft Local Plan is effective and deliverable.</p>		
CON057	REP311	Savills OBO Bellway Homes Ltd			2	QD 04	<p>Draft Policy QD4 Building Heights; and Draft Schedule 12: Tall Building Suitability Zones</p> <p>Our Client fully supports Policy QD4 as this would contribute to the effective delivery of the site, which would contribute to LBL's regeneration objectives.</p> <p>We also note Figure 5.1 (Tall Buildings suitability plan) and corresponding Figure 5.4 (Deptford Creekside tall building suitability zones) and Table 21.12 in Schedule 12 (Table showing Tall Building Suitability Zones) of the draft Local Plan proposes to designate "Sun Wharf Mixed-use Employment Location (including Network Rail Arches)" as an appropriate location for tall buildings – stating a maximum height of 20 storeys. Whilst we fully support the principle of tall buildings and 20 storeys, the drafting is overly prescriptive and must be updated to ensure there is sufficient flexibility since the precise heights would be developed through a design-led approach. Therefore the text "maximum" should be replaced with "approximately".</p>	<p>The Council welcomes the support offered in relation to the new Local Plan Policy QD 04 Building heights.</p> <p>The comment made in relation to the policy application of maximum building heights is noted. For clarity, the Council has prepared the policy in partnership with the Greater London Authority with the objective of ensuring general conformity with the Capital-wide approach set out under London Plan Policy D9 Tall Buildings, which states under Paragraph 3.9.2 that local planning authorities should identify and determine suitable locations for tall new buildings and state that maximum height that could be acceptable. For that reason, the Council considers the policy sound.</p>	No further action required in relation to the new Local Plan.
CON057	REP312	Savills OBO Bellway Homes Ltd			2	QD 06	<p>Draft Policy QD6 Optimising Site Capacity</p> <p>Our Client strongly supports a design-led approach to make the best use of land in order to optimise site capacity so as to deliver redevelopment and its associated planning and public benefits.</p> <p>We also note Part C which aims to address concerns about indicative site development capacities on site allocations. Part C states "Development parameters for specific sites are set out in this Local Plan (Part 3 – site allocations). Where development proposals do not accord with the indicative capacity set out in a site allocation policy they will only be supported where it is clearly demonstrated the optimal capacity will be achieved, having regard to (A) and (B) above...". We consider that current drafting is confusing when read in conjunction with Part A and Part B of the policy – we</p>	<p>The Council welcomes the strong support offered to the design-led approach to optimising site capacity set out under the new Local Plan Policy QD 06 Optimising Site Capacity.</p> <p>The comments made in relation Policy QD 06 C are noted. The Council has carefully considered this matter and concludes that this is not an issue of soundness. The existing policy wording is already clear in setting out how development proposals should seek to meet identified indicative capacities for site allocations. It is clear these are a baseline for the application of Policy QD 06, which itself seeks to secure</p>	No further action required in relation to the new Local Plan.

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							<p>question how a development proposal can comply with an “indicative capacity” – when capacity is indicative.</p> <p>We therefore, Part C be further refined to make it clear that regard should be had to the indicative capacities. Furthermore, the indicative residential units should be considered as the minimum. These suggested amendments are outlined as follows:</p> <div> <p>Suggested amendments to draft Local Plan re: QD6 Optimising site capacity, Part C, p103</p> <p>A Development proposals must use the design led approach to make the best use of land and optimise the capacity of a site, with reference to Policy QD1 (Delivering high quality design in Lewisham).</p> <p>B To establish the optimum capacity of a site consideration must be given to the appropriate development density having regard to:</p> <ul style="list-style-type: none"> a. The type and nature of uses proposed; b. The site context, with reference to the site's immediate and surrounding area, taking into account: <ul style="list-style-type: none"> i. Location setting; ii. Local distinctiveness and character, including heritage assets, with consideration given to the prevailing and/or emerging form and proportion of development in the area; c. Public Transport Access Levels, taking into account current levels and future levels expected to be achieved by the delivery of planned public transport infrastructure; and d. Capacity of infrastructure to support the land uses and density proposed, having regard to the individual and cumulative impacts of development. <p>C Development parameters for specific sites are set out in this Local Plan (Part 3 – site allocations). Where d. Development proposals should have regard to do not accord with the indicative capacity set out in a site allocation policy, and seek to achieve they will only be supported where it is clearly demonstrated the optimal capacity will be achieved, having regard to (A) and (B) above.</p> </div>	an optimal yield through master planning and design-led approaches.	
CON057	REP313	Savills OBO Bellway Homes Ltd			2	QD 08	<p>QD8 High Quality Housing Design</p> <p>Our Client fully supports a high quality design approach for development proposals as set out in Policy QD8.</p> <p>The drafting of Part G relating to north-facing single aspect dwellings needs to be made clearer that it relates to specifically north-facing single aspect units. The draft of Part E needs to be elaborated to take into the daylight and sunlight guidance set in the Mayor’s Housing SPG (2016), specifically paras 1.3.45, 1.3.46 and 2.3.47.</p> <p>The suggested amendments are set out in the table as follows:</p> <div> <p>Suggested amendments to draft Local Plan re: QD8 High quality housing design, Part E and G, p111</p> <p>E. Development proposals for housing must be designed to protect and enhance amenity of building occupants, as well as that of adjoining site users and uses, in line with Policy QD7 (Amenity and agent of change). They must ensure adequate provision of natural light with reference to the latest Building Research Establishment (BRE) good practice guidance, currently BR209: Site layout planning for daylight and sunlight, or suitable equivalent. <u>The BRE Guidance and its quantitative results must be applied flexibly and sensitively and consider use of alternative targets for sites located in high density locations, town centres, part of phased development or part of a masterplan, taking into account the local circumstances, the need to optimise housing capacity.</u></p> <p>[...]</p> <p>G. Development proposals for housing must maximise the provision of dual aspect dwellings. Proposals for <u>north-facing</u> single aspect dwellings, particularly north-facing dwellings will be resisted and only be permitted where it can be suitably demonstrated that the development will provide a more appropriate design solution than a dual aspect dwelling, having particular regard to: [...]</p> </div>	<p>The Council welcomes the support offered in relation to the new Local Plan Policy QD 08 High quality housing design.</p> <p>The subsequent comment relating to north-facing single aspect units and the suggested consequential addition relating to the flexible application of the BRE Guidance is noted. Upon consideration the Council considers that the additional text is unnecessary to ensure soundness. The policy already implies flexibility using the wording – “<i>with reference to the latest Building Research Establishment (BRE) good practice guidance...</i>”</p>	No further action required in relation to the new Local Plan.

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CON057	REP314	Savills OBO Bellway Homes Ltd			3	LNA 1	Policy LNA1 Lewisham's North Area Principles We support the principle of Policy LNA1 that seeks to ensure the North Area benefits from a high quality design-led regeneration to secure the long term vitality and vibrancy of the North Area.	The Council welcomes the support offered in relation to the new Local Plan Policy LNA 1 North Area Principles.	No further action required in relation to the new Local Plan.
CON057	REP315	Savills OBO Bellway Homes Ltd			3	LNA 3	Draft Policy LNA3 Creative Enterprise Zone (CEZ) Our Client supports the principle of draft Policy LNA3 in the retention and provision of clusters of creative and cultural industries subject to viability and where there is a demand for a proposed use. We note reference to Use Class Order Class E and further clarifications in Part B(e) that designates a Cultural Quarter at Deptford Creekside with the objective of facilitating the creation of additional clusters, new high quality workspace and facilities.	The welcomes the support offered in relation to the new Local Plan Policy LNA 3 Creative Enterprise Zone	No further action required in relation to the new Local Plan.
CON057	REP316	Savills OBO Bellway Homes Ltd			2	SD 09	Draft Policy SD9 Lewisham's Waterways Our Client supports in general Policy SD9 (Lewisham's Waterways) that relates to water management and flood risk. We note Part A that states "Potential to facilitate water transport, for both passengers and freight". This ensures redevelopments have sustainable methods of transport to the site. However, policy should state "subject to feasibility". 11 As previously mentioned, we note the supporting text in paragraph 11.56 states prescriptive relief (set back distances) between new development and river frontages – unless otherwise agreed by the Council and Environment Agency, with buffer zones left free of permanent structures and integrated into a new development to enhance their amenity value. It states as follows: In order to ensure there is no adverse impact of the natural functioning of a watercourse, or the integrity of a flood defence, all new development must maintain an undeveloped buffer zone with an adequate set back distance from the watercourse. A relief of 8 metres from a main river and 5 metres from an ordinary watercourse should be secured, unless otherwise agreed by the Council and the Environment Agency. Buffer zones should be left free of permanent structures, ensure adequate access for the maintenance of flood defences and be sensitively integrated into development in order to enhance their amenity value..." (Our Emphasis.) It is considered that the drafting of the policy is currently overly prescriptive and would unnecessarily constrain redevelopment. This would not be effective and could restrict the delivery of future redevelopment and any associated full benefits, including new homes, new affordable homes and new jobs. We consider that each site must be considered on its own merits and any relief (set back distance) between new development and the frontage to be agreed with	<p>The Council welcomes the support offered in relation to the new Local Plan Policy SD 09 Lewisham's waterways.</p> <p>The comment made in respect of policy wording that relates to the potential to facilitate water transport is noted. The Council accepts that not all potential development will be suitable or capable of supporting the delivery of such infrastructure networks. Upon consideration, the Council considers the existing policy wording is already sufficiently flexible, as it does require provision, instead it seeks proposals to respond positively and consider the potential for water transport. For that reason, the Council concludes that the policy is sound.</p>	No further action required in relation to the new Local Plan.

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							<p>the Council and the Environment Agency on a case-by-case basis, having regards to all relevant technical matters, site specific constraints and development that would be brought forward, including the overall planning and public benefits. Whilst it is acknowledged that the current drafting includes the following text: “unless otherwise agreed by the Council and the Environment Agency” – and could potentially allow an alternative set back distance to be agreed with the Council and Environment Agency, we consider the policy should be updated as below. This would ensure that the policy is effective and deliverable.</p> <div> <p><i>Suggested amendments to draft Local Plan re: SD9 Lewisham’s waterways, Part A, p111, p379 & para 11.56 (p382)</i></p> <p><i>A Waterways provide multifunctional social, economic and environmental benefits that support sustainable neighbourhoods and communities. Development proposals should identify and respond positively to the unique attributes of waterways, giving particular consideration to their:</i></p> <p><i>a. Environmental function and ecological qualities; b. Contribution to the Borough’s network of open spaces; c. Recreational and amenity value; d. Distinctive features that help to shape and reinforce the Borough’s physical, cultural and historical character; e. Support for the visitor economy; and f. Potential to facilitate water transport, for both passengers and freight, <u>subject to feasibility</u>.</i></p> <p>[...]</p> <p><i>Para 11.56 – In order to ensure there is no adverse impact of the natural functioning of a watercourse, or the integrity of a flood defence, all new development must maintain an undeveloped buffer zone with an adequate set back distance from the watercourse. A relief of 8 metres from a main river and 5 metres from an ordinary watercourse should be secured, unless otherwise agreed by the Council and the Environment Agency. Buffer zones should be left free of permanent structures, ensure adequate access for the maintenance of flood defences and be sensitively integrated into development in order to enhance their amenity value. Development within 20 metres of a bank of a main river will need Environment Agency consent. Some rivers have defined flood defence assets and proposals will be required to identify assets and these into consideration, where appropriate.</i></p> </div>		
CON057	REP317	Savills OBO Bellway Homes Ltd			2	DM 03	<p>Draft Policy DM3 Masterplans and Comprehensive Development Our Client is supportive of Policy DM3 as masterplans play a key role in clarifying design, capacity and phasing of a site and ensure coordination between various stakeholders.</p>	<p>The Council welcomes the support offered in relation to the new Local Plan Policy DM3 Masterplans and comprehensive development.</p> <p>The Council is committed to working proactively with development partners to apply the master planning approach to deliver sustainable growth and secure successful place-shaping.</p>	No further action required in relation to the new Local Plan.
CON058	REP318	Knight Frank OBO GHL (Leegate)			3	General LEA SA 03	<p>Representations to Regulation 19 Proposed Submission Document Consultation of the Lewisham Local Plan Review.</p> <p>On behalf of GHL (Leegate) Limited (‘GHL’), Knight Frank hereby submit representations in respect of the Regulation 19 Proposed Submission Document Consultation of the Lewisham Local Plan Review, which runs from 1 st March 2023 to 25th April 2023. The London Borough of Lewisham (‘LBL’) commenced the Local Plan Review in late 2015, with a consultation on the main issues for the Plan. LBL subsequently undertook a Regulation 18 Consultation in respect of the Main Issues and Preferred Approaches document (the Draft Local</p>	<p>The Council welcomes the broad support offered in relation to the new Lewisham Local Plan and the wider plan-making process.</p> <p>The Council remains committed to working with development industry partners to secure and delivery the growth and supporting infrastructure networks needed to meet the needs of the Borough’s existing and future residents.</p>	No further action required in relation to the new Local Plan.

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							<p>Plan), which ran from January to April 2021. It is understood that representations made to the Regulation 18 Consultation have informed the content of the Regulation 19 Local Plan Proposed Submission Document. Formal representations were submitted on behalf of GHL to the Regulation 18 Consultation and they should be read in conjunction with this further representation.</p> <p>GHL also submitted representations to the Lewisham Tall Building Study Addendum Consultation that took place between May and June 2022, given the relevance this evidence-based document has in the context of GHL's land interest.</p> <p>GHL maintain their strong support for the preparation of the Lewisham Local Plan Review and the identification of Leegate Shopping Centre, Lee Green, London, SE12 8SS (hereinafter 'the Site') as a site allocation for comprehensive redevelopment and this letter provides GHL's responses to the Regulation 19 Proposed Submission Document Consultation. GHL (Leegate) Limited GHL has a major land interest within the borough through its ownership of the Site, which will be influenced by those policies and allocations contained within the Lewisham Local Plan Review.</p> <p>The Site is currently allocated in the LBL Site Allocations Local Plan (2013) under ref. SA23 (Leegate Centre) for "mixed use retail-led with housing, offices and hotel". The timescales for delivery of development on Site is 2021 – 2026 and an indicative housing capacity of 130 dwellings is stated. However, the principle of a greater quantum of residential has been established through a 2015 resolution to grant planning permission (Ref. DC/14/090032) and a subsequent planning application for a higher-density residential-led scheme (Ref. DC/18/107468). Furthermore, the draft site allocation within the Regulation 19 Local Plan document recognises that the current allocation is now out of date and insufficient to optimise the Site's development potential.</p> <p>Since acquiring the Site, GHL has reviewed the planning applications submitted by the previous site owner against the current and emerging development plan and undertaken a fresh Site appraisal to identify opportunities to optimise the Site's potential for a higher-density mixed-use scheme which can deliver an increased affordable housing offer alongside other public benefits, thereby making effective¹ and optimal² use of the brownfield and accessible site, in the Lee Green District Centre location, which is a key part of the overarching</p>	The general and contextual overview of the respondent's representation is welcomed. The Council responds these in detail below.	

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							<p>national, London and local strategy for delivery much needed additional homes in London.</p> <p>GHL carried out extensive pre-application consultation with a number of stakeholders including LBL, GLA, RBG, TfL, Historic England, and the local community, from January 2021 to April 2022. The Proposed Development was also presented to LBL Design Review Panel ('DRP') on two separate occasions. Following the first DRP meeting, the Panel provided in principle support for the densification of the redevelopment proposals to deliver 35% affordable housing, subject to satisfactory resolution of massing, public realm, townscape, and other issues. Design changes were made following the first DRP and these were acknowledged to be positive at the second DRP meeting.</p> <p>In May 2022, GHL submitted a full planning application to the LBL for the residential-led mixed-use redevelopment of Leegate Shopping Centre (Ref. DC/22/126997). The application was validated with the following description of development: "Demolition of existing buildings, and the construction of buildings up to 15-storeys (including basement level) to provide a comprehensive mixed use development including residential (Use Class C3), flexible commercial floorspace (Use Class E), a community centre (Use Class F2) and a public house (Sui Generis), together with associated public realm, landscaping and highways improvements, vehicular access, car parking and servicing arrangements, cycle parking and stores, and all other ancillary works."</p> <p>The planning application has been subject to the statutory consultation process and is now pending imminent determination, accordingly GHL continue to engage with Officers at LBL and the Greater London Authority ('GLA'). The GLA in its Stage 1 decision (dated 1st August 2022) "strongly supported" the proposed development residential density to include 563 homes. The GLA went on to note that the proposed residential-led redevelopment would include "reprovision and optimisation of land uses that would contribute to the vitality and viability of the town centre". It is in this context that GHL submits this representation. GHL wishes to ensure that the Lewisham Local Plan Review, which will shape the future of the borough and more specifically the regeneration of the Leegate Shopping Centre and Lee Green District Centre, is robust, flexible, and capable of responding to future economic and demographic changes.</p>		

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							<p>Regulation 19 Proposed Submission Document Paragraph 35 of the National Planning Policy Framework ('NPPF') (which the Local Plan will be considered against) requires that any Plan submitted to the Secretary of State for Examination must be capable of being found both legally compliant and sound. This places various duties on the Council including, but not limited to, ensuring the Plan is:</p> <ul style="list-style-type: none"> • Positively prepared – seeking to meet objectively assessed needs, including unmet needs from neighbouring areas where it is practical to do so; • Justified – an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence; • Effective – deliverable over its period and based on effective joint working on cross-boundary strategic matters; and • Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework. If the Lewisham Local Plan Review fails to accord with any of the above requirements, it is incapable of complying with the NPPF, which as a result of Section 19 of the Planning and Compulsory Act 2004, is a legal requirement. <p>Conclusion GHl support the preparation of the Lewisham Local Plan Review and continue to broadly agree with the objectives and aspirations set out within the Regulation 19 Proposed Submission Document.</p> <p>In particular, GHl support the Council's vision for the comprehensive redevelopment of the Leegate Shopping Centre.</p> <p>GHl do however have concerns regarding the site allocation indicative development capacities and the proposed 'normal maximum building height' of 10 – 12 storeys at Lee Green. Planning application Ref. DC/22/126997 clearly demonstrates that the Site is capable of delivering a greater quantum of development in accordance with the London Plan design-led approach to density and indeed Policy QD6 (Optimising site capacity) of the draft Local Plan.</p> <p>It is therefore submitted by GHl that:</p> <ul style="list-style-type: none"> • Site Allocation 3 – Leegate Shopping Centre: the 'normal maximum height' in the draft allocation for Lee Green should be no less than 15 storeys with appropriate wording to provide sufficient flexibility for the detailed determination to be made by LBL when considering the application before them, with all site specific technical information and townscape (HTVIA) analysis to support the tall building proposed; 		

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							<ul style="list-style-type: none"> • Site Allocation 3 – Leegate Shopping Centre: the indicative development capacity for the Site in the draft allocation (circa. 450 residential units, 805sqm employment floorspace, and 5,449sqm main town centre uses) significantly underestimates the role that the Site could perform in meeting a variety of needs and is inconsistent with the proposed application for the Site, and accordingly, such indicative development capacity should be recast to align with the proposed application which has been robustly tested and broadly supported by LBL and statutory consultees including the GLA; • Site Allocation 3 – Leegate Shopping Centre: the quantum of employment floorspace should consider the amount required to continue to support the vitality and viability of Lee Green District Centre and be informed by evidence of demonstrable need. • Site Allocation 3 – Leegate Shopping Centre: the requirement to deliver a health facility should either be robustly justified or removed but in either case expressed in a way which reflects the commercial realities at play (i.e., that securing an operator is outside of the control of the GHl notwithstanding using reasonable endeavours to do so); • Policy QD4 Part C - The technical information provided with GHl's planning application provides evidence that heights above 12 storeys at Leegate Shopping Centre are appropriate and can be accommodated. As stated with Site Allocation 3 above, Policy QD4 Part C should be amended to reflect that the 'normal maximum height' should be no less than 15 storeys. • Policy QD4 Part F - It is not reasonable nor justified that tall buildings must be delivered through a masterplan process in order to ensure that they are appropriately located, designed to a high-quality standard and effectively managed over the lifetime of the development. It is submitted that this should be removed from the draft policy but if the principle is retained, the language must be recast to provide sufficient flexibility for tall buildings to come forward outside of masterplanning provided they are otherwise acceptable in all other planning terms (which is adequately enshrined in the remaining components of the draft plan, and too at national and London Plan level); • Policy QD7 - This should be revised to consider whether impacts of proposed development on amenity are acceptable within the physical and planning context of a site, and accounting for the wider benefits of the development and other policies contained within the Local Plan Review; • Policy DM3 (Masterplans and comprehensive development) – The criteria set out within Policy DM3 Part B can be satisfied through the planning application process and submission 		

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							<p>documents, without necessitating a formal masterplan. The requirement for proposals that form all or part of a site allocation should be removed.</p> <ul style="list-style-type: none"> • Policy EC14 (Major and District Centres) - The requirement for a Shopping Area Impact Assessment would undermine the delivery of sustainable development and should be removed. • Policy EC14 Part G - The designation of 'Primary Shopping Area' should not wholly prohibit the delivery of residential development in these locations, particularly where it has been demonstrated that the location is appropriate for residential-led mixed-use development and supported by commercial evidence; and • Policy EC19 (Public houses) Part C - this is unduly restrictive and contrary to intended purpose (i.e., retaining viable use and attracting public house operators) and wording to the effect of 'the development proposal should not result in a net reduction of public house floorspace' should be removed. <p>Given the sustained and detailed nature of discussions on the specific merits of the proposed regeneration of the Site, as discussed throughout this Representation Letter, it is important that this evidence based and collaboratively developed proposal can be delivered without being bound by unduly onerous and retrospective policy references in the draft Local Plan.</p>		
CON058	REP319	Kinght Frank OBO GHL (Leegate)			1	OL 01	<p>Part 1 – Planning for an Open Lewisham</p> <p>The Council sets out an overarching strategic objective for “An Open Lewisham as Part of an Open London” over the Plan period, which is then supported by nine themed topic areas.</p> <p>Within these nine themed areas, numerous objectives have been set out. For example, Strategic Objective B 'Housing tailored to the community with genuinely affordable homes' aims to: proactively respond to population growth and help to meet housing needs by positively managing the delivery of new homes; ensure residents benefit from good access to a wide range and mix of high quality housing; and foster community cohesion through the provision of housing that enables people to settle in the local area and remain rooted to it.</p> <p>Further, Strategic Objective 14 seeks to facilitate regeneration of localities within the London Plan Opportunity Areas and at key growth locations elsewhere, and also seeks to make the optimal use of land.</p> <p>As with the Regulation 18 Consultation, the Spatial Strategy at Policy OL1 (Delivering an open Lewisham (Spatial Strategy) and</p>	<p>The Council welcomes the support offered in relation to the new Local Plan Policy OL1 Planning for an Open Lewisham.</p> <p>The specific support identified for Strategic Objectives 2 – 4 (set out under Objective B Housing tailored to the community with genuinely affordable homes), 14 and 18 is welcomed.</p>	No further action required in relation to the new Local Plan.

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							<p>Figure 3.3 sets out those locations to which new development and investment will be directed.</p> <p>GHL agree with and acknowledges the importance of the abovementioned objectives and is well placed to support Lewisham in their delivery, at the Leegate Shopping Centre and elsewhere across the borough.</p> <p>GHL's development proposals of Leegate Shopping Centre aligns with these objectives through the provision of 562no. residential units (173no. of which are affordable), including a significant number of family sized units (3+ bed). It should be noted that GHL's May 2022 submission proposed 563no. residential units, however amendments were made to the proposed development in response to the Department of Levelling Up, Housing & Communities consultation on Fire Safety regulations, which resulted in the loss of one residential unit.</p> <p>The development proposals effectively reuse and optimise a highly sustainable previously developed brownfield site and assists with the continued improvement, enhanced sustainability and long-term viability of the Lee Green District Centre.</p> <p>GHL's commitment to the delivery of the comprehensive redevelopment of the Leegate Shopping Centre directly supports the Council's strategic objectives.</p> <p>In response to Policy OL1 (Delivering an Open Lewisham), the designation of Growth Nodes within the areas to which new development will be directed is supported. Located within the Lee Green District Centre Growth Node, the development proposals of Leegate Shopping Centre would assist in delivering the Council's strategic objectives and support Lewisham's Spatial Strategy.</p> <p>Overall, GHL supports the Council's strategic objectives and Spatial Strategy, including the continued focus on making optimal use of land, responding to housing needs by positively managing the delivery of new homes, and prioritising the redevelopment of brownfield land for new housing.</p>		
CON058	REP320	Kinght Frank OBO			2	QD 01	<p>Part 2 – Managing Development High Quality Design</p> <p>The Council continues to promote the delivery of high-quality design in Lewisham through a design-led approach (Policy QD1 Delivering high quality design in Lewisham), stating that development proposals must utilise a design-led approach to contribute to delivering high-quality, inclusive, safe, liveable</p>	The Council welcomes the support offered in relation to the new Local Plan Policy QD 01 Delivering high quality design in Lewisham.	No further action required in relation to the new Local Plan.

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		GHL (Leegate)					<p>and sustainable neighbourhoods in Lewisham. It further states that development proposals must be designed to facilitate good physical and mental health and should provide a high-quality public realm, positive and active frontages, and dedicated space and equipment for relaxation, social interaction and physical activity, and space for play.</p> <p>GHL continues to support the premise of Policy QD1 and remarks that these design principles are embedded into the development proposals for the Leegate Shopping Centre.</p>		
CON058	REP321	Kinght Frank OBO GHL (Leegate)			2	QD 04	<p>Policy QD4 (Building heights) and Figure 5.1 (Tall buildings suitability plan) set out areas where tall buildings are considered acceptable in-principle, in accordance with London Plan Policy D9 (Tall buildings). Policy QD4 Part C states that in Lee Green, buildings should not normally be more than 32.8 meters (10 storeys) to 39.2 meters (12 storeys). Part F states that tall buildings must be delivered through a masterplan process.</p> <p>The Tall Building Review Background Paper (January 2023) considers 'LG3 Sainsbury's Site' and 'LG4 Post-war Leegate shopping parade + adjacent car park' to be the only two locations in Lee Green that may be suitable for tall buildings, and limits the height to 12 storeys on both sites. It is noted that following consultation on the Tall Building Addendum and in discussion with the GLA, LBL Officers have reviewed the approach to identifying tall building suitability zones with a view to add a more granular design analysis.</p> <p>Nonetheless, GHL take issue with the proposed maximum height threshold of 10 to 12 storeys within Lee Green. GHL note that a previous iteration of this policy contained in the Regulation 18 Consultation Regulation identified Leegate Shopping Centre as an area that is suitable for tall buildings. This was supported within the Draft Tall Building's Survey (March 2021), an evidence document, where the Site was acknowledged as being of medium suitability for tall buildings.</p> <p>As remarked in GHL representations to the Lewisham Tall Building Study Addendum Consultation in June 2022, the height and massing for the Leegate Shopping Centre proposals has been subject to significant discussion and scrutiny during the pre-application stage. Architectural analysis and testing has involved discussions with several key stakeholders including LBL Planning, Design and Conservation Officers, LBL Design Review Panel, the GLA and Historic England. These discussions subsequently informed the design development,</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 04 Building Heights.</p> <p>The new Local Plan Policy QD 04 has been prepared in partnership with the Greater London Authority – with the specific objective of ensuring that it is in general conformity with the London Plan.</p> <p>For clarity, the London Plan Policy D9 sets out what local planning authorities should undertake as part of their plan-making responsibilities. Critically, the London Plan requires local plans to determine the locations where tall buildings may be an appropriate form of development, and then identify these locations and heights on maps in Development Plans. For clarity, the London Plan's approach requires that plans identify the maximum suitable building heights. The new Local Plan Policy QD 04 meets this requirement.</p> <p>The preparation of the new Local Plan Policy QD 04 was informed by a comprehensive technical evidence base. This process assessed and the identified the potential for places across the Borough to accommodate tall new buildings. This process took a wide variety of relevant factors into account – including the spatial strategy, accessibility to infrastructure networks, visual character and appearance, prevailing townscape, heritage assets, strategic and local views, and the availability of development sites. The outcomes of this process are</p>	No further action required in relation to the new Local Plan.

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							<p>culminating in the development proposals submitted under planning application Ref. DC/22/126997.</p> <p>Throughout the pre-application process, it was confirmed that the development option comprising 15 storeys was preferable to that of 12 storeys – for example, within the Design Review Panel response letter it was stated “the Panel were clear that from the apex local view, the 15 storey height is superior and more elegant”. As also stated within GHl’s Lewisham Tall Building Study Addendum Consultation representations, the ‘technical information’ submitted as part of the planning application must be considered. The technical information provided within the planning application represents evidence that heights above 12 storeys at Leegate Shopping Centre are appropriate and can be accommodated.</p> <p>Therefore, GHl consider that the maximum height threshold of 12 storeys has not been sufficiently explained or justified. GHl request clarification as to why the ‘normal maximum height’ in Lee Green has been reduced from 15 storeys in the September 2022 version of the Regulation 19 Proposed Submission Document to 12 storeys in the current (January 2023) version of the Regulation 19 Local Plan Proposed Submission Document, and why the technical analysis submitted as part of planning application Ref. DC/22/126997 has not been considered by LBL’s policy team when determining tall building location height thresholds, despite being appraised and generally supported by development management and design teams at LBL for the determination of the live application.</p> <p>On this basis, GHl therefore request that the maximum height threshold of 12 storeys within Lee Green is removed. If a maximum height is considered necessary for such allocation, it is GHl’s submission that it should be no less than 15 storeys with appropriate wording to provide sufficient flexibility for the detailed determination to be made by LBL when considering the application before them, with all site-specific technical information and townscape (HTVIA) analysis to support the tall building proposed. This would be in line with the approach set out in Policy D9 of the London Plan which looks at the acceptability of tall buildings (whether located in an identified location in the Local Plan or not) by assessing that building’s visual, functional, environmental, and cumulative impacts. This type of site specific and detailed appraisal is much more proportionate, and outcome based. This work has already been done in respect of the proposals for the Site and is contained within planning application DC/22/126997. It would be remiss of LBL to not duly consider this as part of the</p>	<p>expressed across the policy – specifically through Figures 5.1 – 5.10. The Council considers this policy approach to be sound and in general conformity with the London Plan.</p> <p>Furthermore, the comments made in respect of the current on-going decision-taking process are noted. For clarification, that process is separate from this plan-making process; whilst decision-takers may be informed by the new Local Plan and its supporting evidence base, the new Local Plan is presently not a material consideration that carries any weight.</p> <p>Finally, it is noted that at the time of the Regulation 19 Consultation, the proposals before the Council were still subject to determination. The Council believes that within such a context it is appropriate that live proposals relating to site allocations remain subject to the policy requirement that <i>“Tall buildings must be delivered through a masterplan process in order to ensure that they are appropriately located, designed to a high quality standard and effectively managed over the lifetime of the development.”</i></p>	

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							<p>underpinning evidence base for the tall building thresholds for the Site and would, ultimately, create an allocation which has: (a) not been positively prepared; (b) is unjustified (being unduly restrictive on the evidence before LBL); (c) is ineffective (creating inconsistency on strategic matters with the GLA and the London Plan's approach to tall buildings); and (d) inconsistent with the national planning framework (as it fetters the ability to make effective use of the land). In addition, GHl do not consider it reasonable nor justified that "tall buildings must be delivered through a masterplan process in order to ensure that they are appropriately located, designed to a high quality standard and effectively managed over the lifetime of the development" as proposed at Policy QD4 Part F.</p> <p>The policy states that the requirements for such masterplans are set out in Policy DM3 (Masterplans and comprehensive development). DM3 Part A states that development proposals must be accompanied by a site masterplan where they form all or part of a site allocation. Policy DM3 Part B requires masterplans to comprise of: an assessment of the site and its context; a detailed site-wide masterplan that responds positively to the spatial strategy for the Borough, site specific development principles and guidelines, and other relevant planning policies; and a delivery strategy that identifies how the development will be implemented and managed over its lifetime. GHl agrees that tall buildings require detailed design scrutiny, as set by the London Plan policy requirements (paragraph 3.9.4).</p> <p>However, it is contended that it is possible to do so without engaging in a masterplan process. GHl engaged in a 14- month pre-application process which informed the submitted proposals. This included design and architectural analysis and testing which informed the design solution for the Site. The criteria set out in Policy DM3 Part B have been satisfied through the application process and submission documents, without necessitating a formal masterplan.</p>		
CON058	REP322	Kinght Frank OBO GHL (Leegate)			2	QD 07	<p>Policy QD7 (Amenity and agent of change) requires proposals to demonstrate how noise and other nuisances will be mitigated and managed, and states that proposals must comply with the agent of change principle in accordance with the London Plan.</p> <p>Part C sets out that development proposals must use the design-led approach to protect and wherever possible enhance amenity, by ensuring:</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 07 Amenity and agent of change.</p> <p>The Council notes and acknowledges the statement that new development may indeed result in some impact (whether real or perceived) on the amenity of neighbouring properties, particularly in urban contexts. That in itself does not make the policy unsound – as the objective</p>	No further action required in relation to the new Local Plan.

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							<p>a) Appropriate provision of privacy is made, ensuring development does not result in unreasonable levels of overlooking;</p> <p>b) Adequate provision for outlook, and demonstrate how this has been optimised;</p> <p>c) Adequate levels of ventilation, daylight, sunlight and open aspects including provision of private amenity space where appropriate;</p> <p>d) New noise sensitive development is sited away from existing noise generating uses and activities, or where this is not possible, providing adequate separation and acoustic design measures;</p> <p>e) Green and open spaces are maintained as tranquil and quiet areas; and</p> <p>f) Development does not prejudice the use of playing fields.</p> <p>Whilst GHl acknowledges the importance of safeguarding residential amenity, it must be recognised that development may result in some impact on the amenity of neighbouring properties, particularly in urban contexts; not least within areas where higher density development is actively encouraged.</p> <p>Throughout the application process, GHl has undertaken numerous assessments which considered the impacts of the development proposals on the amenity of neighbours and nearby sensitive receptors, and the suitability for future occupants. This included, for example, an Air Quality Assessment and a Daylight, Sunlight, Overshadowing, and Solar Glare Impact Assessment. Such assessments concluded that overall, the development proposal would not give rise to any severe or unreasonable impact on amenity and the impacts are considered to be acceptable within the context of the Site.</p> <p>As such, Policy QD7 should be revised to take into account whether impacts of proposed development on amenity are acceptable within the physical and planning context of a site, and accounting for the wider benefits of the development and other policies contained within the Regulation 19 Proposed Submission Document.</p>	is to apply the design-led approach to protect and where possible enhance amenity. The Council considers that the policy is sufficiently flexible to allow decision-takers to make judgements based on evidence prepared in support of proposals.	
CON058	REP323	Kinght Frank OBO GHL (Leegate)			2	HO 01	<p>Housing The Lewisham strategic housing target is set by the London Plan. The London Plan stipulates a ten-year target of 16,670 net housing completions over the period 2019/20 to 2028/29 (London Plan Policy H1 Increasing housing supply). GHl strongly supports the Council's strategy to make the best use of land and optimise site capacity (as stated within Policy HO1 (Meeting Lewisham's housing needs) Part A and Policy QD6 (Optimising site capacity).</p>	The Council welcomes the support offered in relation to the new Local Plan Policy HO 01 Meeting Lewisham's housing needs. The specific support for making the best use of land, optimising site capacity, facilitating an increase in the delivery of new homes, and securing a mix of residential unit sizes (including a	No further action required in relation to the new Local Plan.

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							<p>We note that Lewisham’s Centres, such as Lee Green District Centre, include several locations (including the Leegate Shopping Centre) where a significant number of homes could be delivered. These homes are in sustainable locations close to shops, services, amenities and public transport and should be supported.</p> <p>GHL welcome the Council’s approach to site optimisation through a designed approach, which reflects the Government’s objective of “significantly boosting the supply of homes” (Paragraph 60 of the NPPF).</p> <p>GHL do however contend that imposing a maximum height threshold of 12 storeys on the Site would be at odds with the requirement for density to be optimised through the design-led approach; demonstrated through the evidence accompanying planning application Ref. DC/22/126997 which proposes buildings of up to 15 storeys.</p> <p>Policy HO1 states that the Council will work positively and proactively with stakeholders to facilitate a significant increase in the delivery of new homes to help meet Lewisham’s housing needs. Part E(c) references the need to secure provision of a mix of unit sizes to meet local need and part d states that a reasonable proportion of family units are to be delivered on major developments.</p> <p>GHL supports the acknowledgement within Part E of Policy HO1 that the appropriate mix should be established on a case-by-case basis having regard to the site’s location and character. GHL acknowledges the need for a mix of house types, sizes and tenures to meet identified needs.</p> <p>However, it is important that those policies of the Regulation 19 Proposed Submission Document provide sufficient flexibility and avoid stifling the delivery of new homes as the result of overly prescriptive and restrictive policies.</p>	<p>reasonable portion of family sized units) is noted.</p> <p>The suggestion that the respondent’s site interest has the capacity to accommodate a higher intensity of development, inclusive of a taller new building, is noted. This matter is addressed by the Council under the specific policy headings (see above and below).</p> <p>The Council maintains that the Plan in its entirety is sound – specifically in being justified, positively prepared and effective. The Council considers that the spatial strategy, site allocations and planning policies will deliver the planned-for growth during the plan period.</p>	
CON058	REP324	Kinght Frank OBO GHL (Leegate)			2	EC 12	<p>Economy and Culture</p> <p>Policy EC12 (Town centre network and hierarchy) promotes a town centre first approach. Part A states that development proposals must support and reinforce Lewisham’s town centre network and hierarchy and part B confirms that a ‘town centres first’ approach will be used to assess development proposals for main town centre uses, in line with the London Plan and the NPPF.</p>	<p>The Council welcomes the support offered in relation to the new Local Plan policy EC 12 Town centre network and hierarchy.</p>	<p>No further action required in relation to the new Local Plan.</p>

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							GHL supports this approach and indeed have sought to develop a scheme that will reinforce Lee Green's role within Lewisham's town centre hierarchy.		
CON058	REP325	Kinght Frank OBO GHL (Leegate)			2	EC 13	<p>Policy EC13 (Optimising the use of town centre land and floorspace) adds that development proposals should optimise the use of land and floorspace within town centres by delivering new mixed-use schemes.</p> <p>GHL support this policy and are seeking to achieve this policy objective through the delivery of a high-quality residential-led mixed use development at Leegate Shopping Centre, which would contribute to the revitalisation of the Lee Green District Centre.</p>	The Council welcomes the support offered in relation to the new Local Plan Policy EC 13 Optimising the use of town centre land and floorspace.	No further action required in relation to the new Local Plan.
CON058	REP326	Kinght Frank OBO GHL (Leegate)			2	EC 14	<p>Policy EC14 (Major and District Centres) requires development proposals within Primary Shopping Areas for Class E and main town centre uses which do not contribute to the retail function at ground floor to submit a 'Shopping Area Impact Assessment'. This Statement is required to demonstrate that the proposed development will support the retail function of the Primary Shopping Area. Schedule 5 confirms includes the 'Leegate Centre' as a Primary Shopping Area. Furthermore, Part G states that proposals for residential uses on ground floor level or below, both within the Primary Shopping Areas and the wider town centre area, are inappropriate and will be strongly resisted.</p> <p>The requirement for a 'Shopping Area Impact Assessment' limits future opportunity for Primary Shopping Areas and challenges the flexibility afforded by Class E.</p> <p>GHL are concerned that the Regulation 19 Proposed Submission Document focuses heavily on the retention and provision of traditional retail, which is at odds with the aspirations of the Government through the introduction of Use Class E, which aims to ensure the vitality and viability of high streets. It is worth noting, as an example, that there are currently high vacancy rates across Leegate Shopping Centre and in turn, much of this space is underutilised, of poor quality, and/or occupied on a part time basis. Furthermore, where units are occupied, there is a mix of uses including community, leisure and office use; not just traditional retail. A flexible approach to the Site is therefore required.</p> <p>The non-residential floorspace proposed within the planning application has been informed by a Commercial Market Evidence Report which demonstrates that the proposals reflect local market demand and can contribute positively to a thriving, active, and inclusive District Centre. The requirement</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 14 Major and District Centres.</p> <p>The new Local Plan's Spatial Strategy Policy OL 01 Delivering an Open Lewisham (spatial strategy) directs new growth to a variety of appropriate sustainable locations across the Borough – including to Major and District Centres. This is illustrated under Figure 3.3 Borough-wide Spatial Strategy plan. They are an important and integral component of the Spatial Strategy.</p> <p>For further clarity, Policy EC 14 Paragraph 8.77 states –</p> <p><i>"This policy designates the Primary Shopping Areas within Lewisham's Major and District Centres, which are shown on the Policies Map. PSAs are characterised by their predominantly retail role and character and remain a focal point for town centre activity, particularly as they tend to be in the most accessible parts of the centre. The Local Plan seeks to ensure that the retail function of these areas is maintained and enhanced to support the long-term vitality and viability of the town centres."</i></p> <p>Following on Paragraph 8.78 continues by stating that –</p>	No further action required in relation to the new Local Plan.

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							<p>for a Shopping Area Impact Assessment would undermine the delivery of sustainable development and should therefore be removed.</p> <p>GHL does not agree that residential units should be resisted at ground floor in Primary Shopping Areas and wider town centre areas. GHL is keen to see more residential delivered within Lee Green District Centre. Residential development performs an important role in securing long-term viability and vitality, by increasing its permanent population. It is considered nonresidential floorspace which will have the highest chance of creating a successful place than providing a prescribed amount of floorspace that is not based on local market requirements or site characteristics and therefore unsustainable and/or unviable. The designation of 'Primary Shopping Area' should not wholly prohibit the delivery of residential development in these locations, particularly where it has been demonstrated that the location is appropriate for residential-led mixed-use development and supported by commercial evidence.</p> <p>GHL welcomes the continued emphasis placed on Lewisham's town, district and local centres as the focus for future development within the borough. However, it is strongly contended that the Primary Shopping Area designation is not justified. It is understood from the Policy that 'retail' focusses on traditional retail, with a particular effort to provide Class E(a), however, the existing Leegate Shopping Centre includes non-retail, commercial and community uses which, in the context of the proposed policy, would not be resisted within a Primary Shopping Area.</p>	<p><i>"The Local Plan provides flexibility for a wide range of commercial, leisure, community and cultural uses to locate within town centres. It is nonetheless important that a critical mass of retail uses are maintained within PSAs to reinforce their retail role and character as well as to ensure people have access to a range of consumer goods. Development proposals for Class E(g) retail uses are strongly encouraged to locate within these areas and only when suitable sites are not available within PSAs should other town centre locations be considered in the site selection process."</i></p> <p>The Council considers that the introduction of residential uses at ground floor level within the Primary Shopping Areas identified within the Borough's Major and District Centres is entirely harmful and malignant. Such ground floor locations remain highly appropriate and suitable for commercial activity – providing the Borough's residents, communities, and businesses with good access to such opportunities. Their use for high street commercial uses should be protected and enhanced. The vertical space above Primary Shopping Areas remains an appropriate location for new residential uses. The new Local Plan provides development partners with the opportunity to optimise the use of these spaces for residential accommodation. For these reasons, the Council considers the approach sound.</p>	
CON058	REP327	Kinght Frank OBO GHL (Leegate)			2	EC 19	<p>Policy EC19 (Public houses) sets out a presumption in favour of the retention of public houses in Lewisham, consistent with London Plan Policy HC7 (Protecting public houses).</p> <p>Part C states that development proposals involving the replacement or re-provision of a public house must ensure the replacement facility is of a high-quality design and responds positively to local character. It is further stated that the development proposal should not result in a net reduction of floorspace unless this can be sufficiently justified.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 19 Public Houses. The Council welcomes the respondent's recognition that public houses need to be protected. However, the Council discounts the suggestion that the policy is unsound.</p> <p>In particular, the Council challenges the suggestion that the policy is unreasonably onerous upon development partners –</p>	No further action required in relation to the new Local Plan.

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							<p>Supporting paragraph 8.111 adds that where sites are proposed to be redeveloped, including through comprehensive redevelopment, proposals will be required to demonstrate that they have considered all reasonable options for retaining the pub in-situ.</p> <p>GHL recognises the need to protect public houses in London. However, it should be recognised that there will be instances where replacement or re-provision of a pub is necessary, and as long as the replacement facility is provided to ensure continued social, economic, or cultural viability and vitality will be retained, there should be no requirement to demonstrate that options have been considered to retain the pub in-situ.</p> <p>Nonetheless, the requirement to justify a net reduction of floorspace is unduly onerous and does not afford commercial public house operators the ability to provide facilities that cater to local demand, and that are sufficiently flexible and commercially sustainable.</p> <p>GHL consider that the stated presumption in favour of retaining public houses is sufficient to achieve the policy objective, and the additional restriction on net loss of floorspace is unnecessary. As stated within the comments submitted to the Regulation 18 Consultation, clarification is sought on this approach.</p>	specifically in circumstances where proposals seek to reduce the scale of public house floorspace provision through redevelopment. Firstly, it is unclear why a requirement that development proposals “sufficiently justify” a net reduction in floorspace is unreasonable or onerous. The Council considers it entirely reasonable to assume that a development partner will, when preparing a proposal, have undertaken an iterative design-led process that considered a variety of options in preparing a sound business case to support the scheme. To assume otherwise would imply that developers act upon caprices. For these reasons, the Council maintains that the policy is sound.	
CON058	REP328	Kinght Frank OBO GHL (Leegate)			3	LEA 01	<p>Part 3 – Lewisham’s Neighbourhoods and Places (Lewisham’s East Area) GHL welcomes the key spatial objectives for Lewisham’s East Area, in particular the objective to “re-establish Lee Green District Centre as a welcoming and thriving hub or commercial, cultural and community activity. Deliver public realm improvements together with high quality, mixed use developments through the renewal of Leegate Shopping Centre and other town centre sites.”</p> <p>Policy LEA1 (East area place principles) Part E states that the redevelopment and intensification of sites within the Lee Green District Centre will be supported where development proposals respond positively to local character.</p>	The Council welcomes the support offered in relation to the new Local Plan Policy LEA 01 East Area place principles.	No further action required in relation to the new Local Plan.
CON058	REP329	Kinght Frank OBO GHL (Leegate)			3	LEA 02	<p>In addition, Policy LEA2 (Lee Green District Centre and surrounds) Part A states that development proposals must demonstrate how they will contribute to securing the long-term vitality and viability of Lee Green District centre, and Part E states that development proposals should be designed with positive frontages and active ground floor frontages within the town centre and its edges. Special attention should be given to design at the ground floor and podium levels of buildings.</p>	The Council welcomes the support offered in relation to the new Local Plan Policy LEA 02 Lee Green district centre and surrounds.	No further action required in relation to the new Local Plan.

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							<p>GHL strongly supports the Council’s intention to identify and allocate sites to meet the increased needs within the borough. It is noted that the comprehensive redevelopment of sites such as Leegate Shopping Centre will form a central focus for the renewal and revitalisation of the District Centre.</p> <p>GHL strongly address that the comprehensive redevelopment of the Leegate Shopping Centre will significantly enhance the place qualities of the Centre whilst delivering new housing, improved retail provision and community facilities.</p>		
CON058	REP330	<p>Kinght Frank</p> <p>OBO</p> <p>GHL (Leegate)</p>			3	LEA SA 03	<p>Site Allocation 3 – Leegate Shopping Centre</p> <p>GHL strongly supports the continued allocation of the Leegate Shopping Centre for comprehensive, mixed-use redevelopment of the existing shopping centre, comprising a significant amount of new housing together with modern retail and employment space, leisure, community and cultural facilities, to support the town centre in the long-term.</p> <p>It is noted that the indicative development capacity for the Site is circa. 450 residential units, 805sqm employment floorspace, and 5,449sqm main town centre uses, which has not changed since the Regulation 18 Consultation. The development requirements at paragraph 16.28 remain broadly unchanged, but with the additional requirement regarding community infrastructure, citing “provision of community infrastructure to meet demand arising from the development, including a new health facility in partnership with the CCG, NHS and other health bodies”.</p> <p>Additional development guidelines have also been included at paragraph 16.29, requiring development to take into account the Grade II listed fire station and the Old Tigers Head Pub in order to reinstate connections to Lee Green’s historic past, and requiring the Applicant to work in partnership with the Environment Agency and Thames Water.</p> <p>NPPF paragraph 119 promotes the effective and efficient use of land in meeting the need for new homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. NPPF paragraph 120 identifies that decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and that decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. GHL</p>	<p>The Council notes the comments made and welcomes the broad level of support offered in relation to the new Local Plan Policy LEA SA 03 Leegate Shopping Centre.</p> <p>Development Density and Capacity</p> <p>The Council notes the comments made in relation to the indicative development capacities identified for the site allocation under the new Local Plan Policy LEA SA 03.</p> <p>Within this context the Council highlights that the new Local Plan must be read and considered in its entirety. The new Local Plan site allocations identify indicative development capacities – the emphasis being upon the word “indicative”. The capacity figures identified within the new Local Plan are very much a starting point on a journey to identifying and securing optimal development capacities.</p> <p>In turn, the development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an opportunity to propose and justify proposals that through master planning</p>	<p>No further action required in relation to the new Local Plan.</p> <p>Suggest that the Council secure an agreed position on the site allocation’s delivery trajectory through a Statement of Common Ground.</p>

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							<p>supports the Government’s aspiration for the effective and efficient use of highly sustainable previously developed sites and the role that increased densification of urban sites will perform in protecting settlements beyond the boundary. Indeed, as set out within the NPPF, the Council should seek to achieve higher densities that take account of a range of factors. GHl encourages the Council to allow for greater densities within urban areas where appropriate, including within the Lee Green District Centre ‘Growth Node’.</p> <p>It should also be noted that in the Government’s draft NPPF (consultation version December 2022), the commitment to secure effective use of the land remains embedded at the heart of such draft. This demonstrates the Government’s continued intention and aspiration to promote effective and efficient use of land, especially in urban settings like the Site.</p> <p>The Site’s District Centre location means it is appropriate for high density residential development that optimises the number of homes delivered in the urban area, in the most sustainable location. The Site and other site allocations in the area can play a key role in achieving ambitious housing growth during the Plan period. Therefore, it is contended that the proposed indicative development capacity and Council’s aspirations on unit numbers, significantly underestimates the role that the Site could perform in meeting a variety of needs.</p> <p>We therefore again seek clarification on the Council’s justification as to how the proposed development capacity has been determined. It is GHl’s understanding that no technical feasibility studies have yet been undertaken by the Council to determine these indicative capacity figures. The quantum of uses proposed within planning application Ref. DC/22/126997 have been informed by a design-led process, and pre-application discussions with LBL and the GLA to make the most effective use of the Site which will assist with the continued improvement, enhanced sustainability and long-term viability of the Lee Green District Centre. During this process, significant technical evidence has been submitted and scrutinised in order to justify the decisions made and obtain consensus. This approach is consistent with the London Plan Policy D3 (Optimising site capacity through the design-led approach) that requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations.</p> <p>Notwithstanding the indicative residential development capacity stated in the draft allocation, GHl is proposing to</p>	<p>and/ design-led approaches offer optimal development capacities.</p> <p>The Council concludes that the new Local Plan’s master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p> <p>The Council welcomes the additional technical work prepared by development partners to support their proposal. Such evidence can be duly considered by decision-takers and a judgement taken. As expressed above, the new Local Plan provides a sufficiently flexible framework that allows for such an evidential process.</p> <p>In respect of the site allocation’s capacity to accommodate commercial and main town centre uses, the Council notes the comments made by the respondent. It is acknowledged that market signals can, when supported by suitable and proportionate evidence, inform decision-taking. However, the Council suggests a degree of caution be exercised. All markets are subject to change, and past trends that suggest a reduced market demand for commercial floorspace may not endure over the plan-period.</p> <p>Delivery Trajectory The Council welcomes the statement on the anticipated delivery trajectory for the site allocation. It is suggested that the site allocation promoter and the Council enter a Statement of Common Ground on this matter to demonstrate the robustness of the trajectory.</p> <p>Provision of Community Infrastructure – New Health Facility</p>	

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							<p>deliver an increased quantum of residential units which would make a significant contribution to the Council's housing and affordable housing targets. The proposed quantum of residential units has been informed by significant analysis and testing and extensive pre-application discussions. The application is supported by a suite of technical evidence which demonstrates that the Site is capable of delivering the proposed quantum.</p> <p>Regarding the quantum of employment and main town centre floorspace, consideration must be given to the amount required to continue to support the vitality and viability of Lee Green District Centre. GHL's aspiration for the Site is to ensure that the proposed commercial uses and floorspace encourage investment to improve vibrancy and vitality and support the boroughs strategy policies and objectives for Lee Green. The balance and quantum of non-residential uses within the proposed development has been fully informed by market intel and research taking into account existing and future demand, comparable District Centres and redevelopment schemes and engagement with key stakeholders.</p> <p>It should be noted that the GLA in its Stage 1 decision (dated 1st August 2022) "strongly supported" the proposed development residential density to include 563 homes. The GLA went on to note that the proposed residential-led redevelopment would include "reprovision and optimisation of land uses that would contribute to the vitality and viability of the town centre".</p> <p>Similar to the request made by GHL within the representations submitted to the Regulation 18 Consultation, it is requested that the proposed Leegate Shopping Centre site allocation is reviewed in the context of the submitted development proposals and is structured in a way that seeks the optimisation of site capacity through a design-led approach, and also ensures the quantum of commercial floorspace is appropriate and informed by evidence of demonstrable need.</p> <p>The site allocation sets out that the timeframe for delivery is between 1-5 and 6-10 years. GHL support an anticipated timeframe of 1 – 5 years, noting that a decision on the submitted planning application is forthcoming and GHL estimate a construction period of approximately 4 years.</p> <p>GHL appreciates the importance of the requirements and guidelines contained within the proposed site allocation and have thus made considerable effort to integrate these into the</p>	<p>The Council notes the comments made in relation to the new Local Plan's objective in seeking to secure necessary infrastructure to support new growth – specifically in terms of providing a new health facility to meet the needs of new residents and communities.</p> <p>The Council highlights that the redevelopment of the Leegate Shopping Centre site allocation has a long planning history, which has recently resulted a planning permission. The permitted scheme includes the provision of a new health facility within the redevelopment. The Council understands that the NHS are in discussions with the development partner. It is noted that should the NHS decide not to occupy the new facility, the permission (and indeed the policy) provides the opportunity for other alternative providers secure use of the provision.</p> <p>The Council notes that local demand for a new health facility at the Leegate Shopping Centre site allocation is evidenced - demonstrably through engagement with residents and communities. For these reasons the Council considers the policy sound.</p>	

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							<p>development proposals – for example, through delivery of new and improved public realm and provision of community infrastructure.</p> <p>The proposed development includes space for the delivery of a new medical facility which is intended to be secured by a mechanism in any S106 Agreement. GHl has and continues to consult with the CCG, NHS and other health bodies regarding the delivery of this space.</p> <p>Notwithstanding, the prescriptive requirement of the site allocation to deliver such a facility has not been evidenced or justified by the Council and needs to be balanced against the real life consenting and approval process which a site (not just this Site but all sites proposing such a use) needs to go through in order to secure an NHS or health facility; ultimately whether or not the NHS (acting through the relevant CCG) wish to enter into a lease and operate a facility will be a matter for them and their relevant assessed needs, financial budgets for the location and time period in question and a whole host of other influencing factors.</p> <p>It is noted that the Draft Infrastructure Delivery Plan ('IDP') (2022) references provision of a 'new health facility to meet needs of expanding and changing population for primary and community services' that is intended to sit within the new development in Lee Green. It does not, however, provide evidence of need or justification for such provision. It is understood that an Infrastructure Delivery Schedule ('IDS') is forthcoming, based on the findings on the IDP, which has been prepared in conjunction with correspondence with infrastructure providers and other stakeholders. When published, the IDP should provide more certainty on the demand for medical facilities in this area.</p> <p>Furthermore, the reference to partnership with the CCG, NHS, and other health bodies is unduly onerous and unreasonable. GHl are not in control of the ability to ensure such opportunities / demand exists and can only seek to include these bodies in efforts to find an end user. The allocation must therefore retain flexibility to deliver a medical or health user under the relevant Use Class and not seek to impose additional controls or make the provision specific to any type of medical user.</p> <p>Furthermore, it should be noted that the provision of a medical facility within the development shall be addressed through the Section 106, on the basis of reasonable</p>		

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							<p>endeavours to identify demand from a wide range of medical users, including the CCG, NHS and other health bodies.</p> <p>In summary, GHL welcome the allocation of the Leegate Shopping Centre for comprehensive mixed-use development. However, it is imperative that the site allocation is consistent with the submitted development proposals and reflective of the pre-application discussions undertaken with Lewisham in order to determine the most successful design solution for the Site.</p> <p>The prescriptive requirements (e.g. the requirement to deliver a health facility), should either be robustly justified, or removed and in either case expressed in a way which reflects the commercial realities at play (i.e. that securing an operator is outside of the control of the GHL notwithstanding using reasonable endeavours to do so).</p>		
CON059	REP331	<p>BPTW</p> <p>OBO</p> <p>Phoenix Community Housing (PCH)</p>			3	LSA SA 09	<p>BPTW are instructed by Phoenix Community Housing (PCH) to prepare representations to Lewisham's Local Plan Regulation 19 consultation. This follows representations submitted to the Regulation 18 Local Plan and the A21 Development Framework in 2021.</p> <p>PCH is a not-for-profit resident-led housing association based in south London. It owns and manages more than 7,600 homes in the Lewisham wards of Bellingham, Catford South, Downham and Grove Park and builds genuinely affordable new homes with an emphasis on sustainability and high-quality design.</p> <p>PCH is a valued partner of the Council and we have worked together on many schemes within the borough. As a key stakeholder within the borough, PCH has a keen interest in the new Local Plan and other emerging development plan documents that may have a major impact on the future operations of the association.</p> <p>PCH acquired the Catford Police Station site, located within Lewisham's South Area in 2021, and proposes a mainly affordable housing scheme. However, this is to be finalised following design development, pre-application discussions with the Council and viability assessment of the site options during 2023. A PPA will shortly be agreed with the Council to steer pre-application discussions and the planning application programme for development at the site.</p> <p>PCH are generally supportive of the draft Local Plan and these representations are focused on Part Three, Chapter 17 of the</p>	<p>The Council welcomes the broad level of support offered in respect of the new Local Plan in its wider sense.</p> <p>The Council remains committed to working with development partners to facilitate the delivery of planned-for growth across the Borough – inclusive of meeting the housing, employment, town centre, retail, and infrastructure network needs of residents and communities. This is particularly the case in terms of securing genuinely affordable housing provision – an area of need that remains acute. The Council considers that the new Local Plan, through its spatial strategy, site allocations and planning policies provides a sound platform for securing this objective – both through plan-making and decision-taking.</p> <p>The Council notes the specific comments made in relation to the new Local Plan Policy LSA SA 09 Catford Police station. For clarity, the policy seeks to secure a mixed-use redevelopment with compatible residential, commercial, community and main town centre uses. The site provides a strong frontage to the A21 and is an appropriate and highly sustainable location that can deliver a mix of uses.</p>	<p>No further action required in relation to the new Local Plan.</p> <p>The Council will contact the site allocation promoter with the objective of securing a signed SoCG that identifies matters of agreement between the parties and a delivery trajectory.</p>

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							<p>Local Plan and the related site allocation for the south area under (9) Catford Police Station which currently identifies an indicative capacity identified for 24 residential homes and 1,072 sqm of employment floorspace.</p> <p>PCH welcomes the site allocation of the Catford Police Station site in the Local Plan and the acceptance, in principle, that new development can be brought forward on the site. However, it is considered that the indicative capacity and quantum of uses should be reviewed. As currently drafted, the Plan is not yet considered 'sound' as the development quantum and mix is not robustly justified, or evidence led. The Plan fails to consider the available evidence base including a recent site capacity study and will not be effective in optimising development potential of the site for a residential and affordable housing-led scheme.</p> <p>Local Plan and Regulation 19 Evidence Base The Site Allocations Background Paper (2021) was prepared for the Regulation 18 Plan and needs updating. The Background Paper states that the indicative development capacity for site allocations is established firstly by any existing planning permissions, masterplan sites or pre-application stage proposals, with a fallback position of a crude numeric calculation based on the London-wide SHLAA density matrix (see Appendix 1). With regards to the Catford Police Station, it is understood that pre-application discussions were undertaken by a previous developer in Summer 2021 with an initial scheme comprising up to 80 homes and ~300 sqm of retail space presented. The housing and employment quantum for the site allocation of the site does not appear to acknowledge or give weight to this initial scheme or any alternative scheme likely to be presented by PCH with Officers during 2023 based on its own site capacity study. Instead, as set out in Appendix A of the Site Allocations Background Paper, the quantum of residential development on the proposed site allocation appears to rely solely on the standard London SHLAA method (standard method) approach.</p> <p>There is clearly a hierarchy of information and evidence base used to identify site capacities, with pre-application schemes and applicant capacity studies being preferred to the standard method. There is no justification for why the Policy Team in preparing the Local Plan have ignored or omitted these other sources of evidence and thus the site allocation for the Catford Police Station site cannot be seen as justified. It should also be recognised that the standard method approach results in a site capacity of 46 homes (see Appendix 1 of this representation),</p>	<p>Comments made in relation to the site allocations possible development capacities are noted. Within this context the Council highlights that the new Local Plan must be read and considered in its entirety.</p> <p>The development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>The Council acknowledges and reiterates that development proposals for site allocations should be considered on a "site by site" basis. The site-specific master planning and/ or design-led approach required by the new Local Plan provides an appropriate and sound mechanism to do so.</p> <p>For further clarity, the indicative development capacities identified for the site allocation provide a starting point for the decision-taking process, which provides an appropriate platform for the detailed assessment of what may comprise optimal development. In this respect, the Council welcomes the work being undertaken by the respondent.</p> <p>The Council concludes that the new Local Plan's master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development</p>	

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							<p>which significantly differs from the 24 home capacity currently identified in the site allocation. It is unclear where this discrepancy comes from if the capacity of the site allocation has in fact been established via the standard method approach. The indicative capacity of the Catford Police Station site allocation instead appears to have been identified via the baseline capacity study undertaken as part of the A21 Development Framework (see Appendix 2 of these representations) which is not listed as the part of the evidence base to the Regulation 19 Plan. The baseline study in the A21 Development Framework started with an indicative capacity of 39 residential homes and 487sqm non-residential floorspace for the site but after a design exercise was then reduced to a total of 24 units and an undefined quantum of non-residential floorspace. It should be noted that the capacity assessment is only based on land to the rear of the site and that it does not include or add potential capacity (either through reuse or reuse with extension) of the retained Local listed police station buildings fronting the A21, thus it significantly underplays total site capacity within the redline boundary of the site allocation as shown in the Local Plan. The use of the A21 Development Framework as an evidence base also contradicts the approach set out in the Site Allocation Background Paper and adds further uncertainty to whether the Council's approach to the site allocation of the Catford Police Station site is justified or will be effective in delivering Local Plan strategic objectives.</p> <p>Additionally, there does not seem to be any reasoned justification or evidence for including 1,072sqm of employment floorspace in the site allocation. This figure was not identified in the Regulation 18 Local Plan or the capacity study in the A21 Development Framework and it is not clear whether this is based on retaining some employment floorspace in the existing buildings. If the standard method density matrix methodology is followed, 160sqm of employment and 320sqm of main town centre uses could be provided or included in the allocation. These figures are very similar to the 162sqm of employment and 325sqm of main town centre uses proposed for the allocation in the previous Regulation 18 version of the Plan.</p> <p>Again, the evidence and methodology used to calculate and justify these changes is unclear and the inclusion of employment and/or main town centre uses seems arbitrary. Table A.2 in Appendix A of the Site Allocations Background Paper indicates that 5% of the site area should be employment and 10% should be main town centre uses, yet no explanation is provided as to why this should be the case. It is our view that</p>	<p>partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p> <p>The comments made in respect of the adopted A21 development Framework. For clarity, this document has been adopted as a framework to guide decision-taking. It was prepared in response of specific demands raised in relation to the A21 growth Corridor.</p> <p>Whilst the Council is not seeking to provide the Framework with the same weight as it would a Supplementary Planning Document, it nevertheless remains a policy document that is based on technical evidence and has passed through public consultation. Going forward and following the formal adoption of the new Local Plan, the Council will determine whether the Framework merits review and should be adopted as Supplementary Planning Guidance to the new Local Plan.</p> <p>Comments made in relation to the site allocation's mix of uses are noted. For clarity, the site's previous use was non-residential, it previously having functioned as a public/ civic building (a Police Station) and the adjoining use – an Army Reserve Barracks – is also non-residential. For clarity, the new Local Plan's approach towards site allocations is to secure mix-use development at all but one site (Policy LSA SA 14 Bestway Cash and Carry). In all these cases, the site allocations provide viable, deliverable, and developable opportunities to secure mixed-use development. It is accepted that this constitutes sustainable development that can make a wider contribution towards successful place-making.</p> <p>The respondent's comment that the site allocation is not within an identified retail centre and is within a suburban location is</p>	

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							<p>an arbitrary percentage should not be applied to the site allocation for Catford Police Station as it would not reflect the suburban character of the site and force the introduction of employment/town centres uses into a predominantly residential area, in conflict with good land use principles.</p> <table border="1"><thead><tr><th>Source</th><th>Residential Quantum</th><th>Non-residential Quantum</th><th>Notes</th></tr></thead><tbody><tr><td>2021 Previous developer scheme</td><td>~70-80</td><td>~300 sqm</td><td>No weight seems to have been given to this initial scheme understood to have been discussed with LB Lewisham during pre app.</td></tr><tr><td>A21 Development Framework</td><td>24 (uses 39 as an indicative capacity)</td><td>N/A (uses 487sqm as an indicative capacity)</td><td>Site capacity is only based on new development on land to the rear of the existing buildings. No capacity is provided for reuse or extension of existing buildings fronting the A21.</td></tr><tr><td>Standard Method</td><td>46</td><td>320sqm employment and 160 sqm main town centre</td><td>Appendix A of the Background Paper (2021) identifies that the standard method is the evidence based used to establish site capacities.</td></tr></tbody></table> <p>Table 1: Summary of all evidence sources</p> <p>PCHA Site Capacity Study PCHA commissioned Metropolitan Workshop in March 2023 to develop a capacity study for this site. Two options have been developed as shown in the table below and Appendix 3 of these representations. They include a mixed-use scheme and a 100% residential scheme that retains the locally listed Police station building fronting the site.</p> <table border="1"><thead><tr><th></th><th>100% Residential</th><th>Mixed-Use</th></tr></thead><tbody><tr><td>Residential Quantum</td><td>62</td><td>60</td></tr><tr><td>Residential Mix</td><td>31% 1bed 34% 2bed 35% 3B+</td><td>30% 1bed 34% 2bed 36% 3B+</td></tr><tr><td>Other uses</td><td>N/A</td><td>128sqm employment space</td></tr><tr><td>Maximum Height</td><td>6 storeys</td><td>6 storeys</td></tr><tr><td>Car Parking</td><td>8 spaces</td><td>8 spaces</td></tr></tbody></table> <p>Table 2: Metropolitan Workshop capacity study</p> <p>PCH has a number of sites in the immediate area with employment/community use floorspace and it is considered that such space could reasonably accommodate some of the employment floorspace expected at the Catford Police Station site – this would also enhance the community value and employment benefits that these existing PCH facilities provide whilst also providing new tenants with opportunities for support and collaboration with PCH. As the site capacity study shows, the site can accommodate a level of development that far exceeds capacity identified in the Local Plan Regulation 19 site allocation and that it should be amended to show capacity for 60-65 homes and a smaller quantum of employment floorspace to better align with design led approach to optimising development capacity required by the London Plan.</p>	Source	Residential Quantum	Non-residential Quantum	Notes	2021 Previous developer scheme	~70-80	~300 sqm	No weight seems to have been given to this initial scheme understood to have been discussed with LB Lewisham during pre app.	A21 Development Framework	24 (uses 39 as an indicative capacity)	N/A (uses 487sqm as an indicative capacity)	Site capacity is only based on new development on land to the rear of the existing buildings. No capacity is provided for reuse or extension of existing buildings fronting the A21.	Standard Method	46	320sqm employment and 160 sqm main town centre	Appendix A of the Background Paper (2021) identifies that the standard method is the evidence based used to establish site capacities.		100% Residential	Mixed-Use	Residential Quantum	62	60	Residential Mix	31% 1bed 34% 2bed 35% 3B+	30% 1bed 34% 2bed 36% 3B+	Other uses	N/A	128sqm employment space	Maximum Height	6 storeys	6 storeys	Car Parking	8 spaces	8 spaces	<p>noted. Whilst the Council acknowledges this fact, it also notes that suburban areas are characteristically comprised of a mix of uses and frequently include mixed-use developments. There are numerous examples of this across the Borough. It would be unsound for the new Local Plan to propagate a homogenous pattern of use. For these reasons, the Council maintains that the proposed mix of uses is sound.</p> <p>Finally, the Council notes and supports the respondent’s aspirations for delivering the site allocation in a timely fashion.</p>	
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							<p>PCH will enter a PPA to steer pre-application discussions during 2023 and an agreed programme for a planning application for the site. Weight should be given to this intent in considering modifications to the Plan prior to the Examination of the Local Plan.</p> <p>The site allocation for the Catford Police Station site in the Local Plan Regulation 19 is not yet considered sound as it is not justified by the Council’s evidence base (including an updated Site Allocations Background Paper or if the standard method approach is used) or the design led approach that will be progressed by PCH in its site capacity study and planning application. As it stands, the current drafting of the site allocation in the Plan fails to optimise the site’s capacity and undermines strategic objectives in the Plan for delivering more affordable housing in the Borough.</p> <p>Objectives for the Site The failure of the draft site allocation to optimise the site capacity is particularly pertinent given that PCH bought the site to deliver affordable housing and as the site was publicly owned, a 50% affordable housing provision is required unless supported by a viability assessment through the Viability Tested Route for a planning application. Housing affordability plays a significant role in London’s housing crisis. According to the GLA data store, there have only been 1,656 residential completions in LB Lewisham in the period 2019/2022, which is significantly below the London Plan target of 1,667 per year (5001 for three years). Furthermore, the Borough has only approved 1,789 homes in the period between 2019/2022. The figures are even starker when affordable housing delivery is singled out: of the 1,656 completions, only 352 were affordable; of the 1,789 approvals, only 285 are affordable.</p> <table><tr><th></th><th>Approvals</th><th>Completions</th><th>London Plan Target (3 years)</th></tr><tr><td>Total residential</td><td>1,789</td><td>1,656</td><td>5001</td></tr><tr><td>Affordable</td><td>285 (16%)</td><td>352 (21%)</td><td>Strategic target of 50% (2,500)</td></tr></table> <p>Table 3: Residential Approvals and Completions in Lewisham 2019/2022</p> <p>The figures quoted above show that LB Lewisham is not delivering enough housing and does not have a strong pipeline of approvals to boost this supply. In a context where London-wide there is an acute need for housing, with 47% of this being for affordable tenures, a local, community-based housing association that is looking to optimise the site capacity for affordable housing development should be strongly supported.</p> <p>PCH have a recent history of delivering high quality affordable housing in the borough, with completed developments at:</p>		Approvals	Completions	London Plan Target (3 years)	Total residential	1,789	1,656	5001	Affordable	285 (16%)	352 (21%)	Strategic target of 50% (2,500)		
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Affordable	285 (16%)	352 (21%)	Strategic target of 50% (2,500)																		

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							<p>> Nuthatch House, Whitefoot Lane > Hazlehurst Court > Woodbank Road</p> <p>PCH are also on site actively delivering affordable homes at:</p> <p>> Velo House, Catford > Melfield Gardens > Farmstead Road</p> <p>Given PCH's strong positive presence in the borough, they are looking to progress the Catford Police Station site through a planning application with a view to optimising affordable housing delivery. This includes a range of unit sizes as demonstrated in the initial Metropolitan Workshop capacity study. PCH therefore requests that the Local Plan and the Catford Police Station site allocation is amended prior to submission of the Plan with the amendments provided as an addendum to the Regulation 19 Local Plan to ensure that the site capacity and contribution it could reasonably make to strategic Local Plan objectives for housing and sustainable communities is achieved. Alternatively, modifications to the Plan should be provided to the Inspector as part of the Local Plan Examination.</p> <p>Suggested Changes to Site Allocation Text</p> <p>> Increase indicative development capacity to 60-65 homes - this in line with PCH's own capacity study and would include reuse or reuse and partial extension to the existing police station buildings fronting the A21 i.e. It would identify a capacity suitable for all land with the site allocation boundary.</p> <p>> Reduce the non-residential/ employment floorspace to zero or reduce to the Regulation 18 requirements - 162sqm employment and 325sqm main town centre uses, in line with the standard method. This should be accompanied with clearer guidance as to why these uses are necessary in this location.</p> <p>> Alter the timeframe for delivery to years 1-5.</p> <p>> Para 17.46 – if non-residential uses are maintained, guidance should be put here to explain why they are necessary. The site lies outside of any designated town centre and has a suburban character with predominantly residential uses surrounding the site.</p> <p>> Para 17.47 – Point 3 should be amended to say 'development should have regard to the A21 Development Framework which provides guidance for development on land</p>		

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							<p>to the rear of the existing buildings on the site'. The A21 Development Framework is a SPD (Supplementary Planning Document) with less weight given to these guidance's than development plan documents in decision making and therefore it is too prescriptive to say development 'must' conform to it.</p> <p>Summary Overall, PCH are generally supportive of the draft Local Plan and welcomes the site allocation of the Catford Police Station site and the acceptance, in principle, that new development can be brought forward on this site. However, the current drafting and wording of the site allocation for (9) Catford Police Station in Part Three, Chapter 17 of Local Plan Regulation 19 appears to rely on the capacity study undertaken in the A21 Development Framework and not the standard method approach outlined in the Site Allocations Background Paper (2021), or a design led approach that will be adopted by PCH in delivering a scheme for the site. The A21 Development Framework study only provides guidance on development capacity for land to the rear of the site allocation and does not include or add potential capacity (either through reuse or reuse with extension) of the retained Locally listed police station buildings fronting the A21 which are also located in the site allocation boundary and will contribute to overall site capacity. PCH strongly believes that the full range of evidence base should be used to determine a more appropriate site capacity in the Local Plan Regulation 19. As this representation shows, there are several additional evidence sources that indicate the site can reasonably accommodate a higher development capacity than is currently identified in the Local Plan. Given PCH's plan to deliver affordable housing on this site, Officers are encouraged to re-appraise the evidence summarised in this letter to identify a more justified development capacity for the Catford Police Station site allocation and to put forward amendments in a modification to the Plan.</p>		

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							<p>Appendix 1: Standard Method Calculation</p> <p>TABLE 6.1 – London-wide SHLAA density assumptions (dwellings per hectare)</p> <table><tr><th>Setting</th><th>PTAL 0-1</th><th>PTAL 2-3</th><th>PTAL 4-6</th></tr><tr><td colspan="4">Standard density assumptions</td></tr><tr><td>Suburban</td><td>65</td><td>80</td><td>115</td></tr><tr><td>Urban</td><td>80</td><td>145</td><td>225</td></tr><tr><td>Central</td><td>100</td><td>210</td><td>355</td></tr><tr><td colspan="4">Town centre density assumptions</td></tr><tr><td>Suburban</td><td>-</td><td>-</td><td>-</td></tr><tr><td>Urban</td><td>95</td><td>170</td><td>260</td></tr><tr><td>Central</td><td>110</td><td>240</td><td>405</td></tr><tr><td colspan="4">Opportunity area density assumptions</td></tr><tr><td>Suburban</td><td>80</td><td>145</td><td>225</td></tr><tr><td>Urban</td><td>100</td><td>210</td><td>355</td></tr><tr><td>Central</td><td>250</td><td>350</td><td>450</td></tr></table> <p>Figure 1: London Wide SHLAA density assumptions (extract from the Background Paper (2021))</p> <p>Site Allocation Details Setting – Urban PTAL – 3/4 Site Area – 0.32ha</p> <p>Calculation 145 * 0.32 = 46.4 This provides a crude site capacity of 46 units based on the majority of the site being PTAL 3, however, a small part of the site is classified as PTAL 4 and therefore, through the design led approach, higher densities may be appropriate. The below calculation shows the capacity with a PTAL of 4 225 * 0.32 = 72</p> <p>Appendix 2: Site Capacity Study in the A21 Development Framework</p> <p>Appendix 3 - Metropolitan Workshop Capacity Study (March 2023)</p>	Setting	PTAL 0-1	PTAL 2-3	PTAL 4-6	Standard density assumptions				Suburban	65	80	115	Urban	80	145	225	Central	100	210	355	Town centre density assumptions				Suburban	-	-	-	Urban	95	170	260	Central	110	240	405	Opportunity area density assumptions				Suburban	80	145	225	Urban	100	210	355	Central	250	350	450		
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CON060	REP332	SANTANDE R C/O LASALLE INVESTMEN T MANAGEM ENT			3	LSA SA 10	<p>Representation includes submitted form</p> <p>Dear Sir or Madam LONDON BOROUGH OF LEWISHAM LOCAL PLAN REGULATION 19 STAGE CONSULTATION REPRESENTATIONS MADE ON BEHALF OF SANTANDER C/O LASALLE INVESTMENT MANAGEMENT</p> <p>Introduction We write on behalf of our client, Santander c/o LaSalle Investment Management, in respect of its land interests in land at 10 Beckenham Hill Road in Catford (the ‘Site’). Our client has previously promoted the Site through earlier rounds of consultation for the emerging Local Plan. This included the submission of representations to the Regulation 18 stage consultation in April 2021. This correspondence is submitted to provide a formal response to the Regulation 19 consultation on the Lewisham Local Plan Proposed Submission Document (January 2023).</p>	<p>The Council notes and welcomes the support offered to the overarching aspirations for investment and growth within Lewisham as detailed through the new Local Plan.</p> <p>The Council also notes the more detailed comments set out in relation to the new Local Plan Policy LSA SA 10 Homebase/ Argos, Bromley Road. The respondent’s stated objection to the use and identification of indicative capacities is noted.</p> <p>The Council remains committed to working with development partners to facilitate the delivery of planned-for growth across the Borough – inclusive of meeting the housing, employment, town centre, retail,</p>	<p>No further action required in relation to the new Local Plan.</p> <p>Although it Officers are not proposing that any modifications be made in respect of the site allocation specific development capacities, the Council could consider undertaking a separate exercise to identify and assess the possible uplift that higher intensity development could offer. This could inform a parallel decision/ discussion on whether the Council’s proposed 5% buffer is sufficient to secure a sound new Local Plan. The possible assessment of site uplift should seek to identify a RAG rate for</p>																																																				

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							<p>In summary, our client supports the overarching aspirations for investment and growth within Lewisham as detailed within the Regulation 19 Draft Local Plan. This includes the identification of the Site as an allocation for comprehensive residential led mixed use redevelopment.</p> <p>However, it objects to the identification of an indicative capacity of 141 residential units and 5,694 sq.m of gross non-residential floorspace on the basis that this would significantly limit the prospects of securing redevelopment due to the impact on overall scheme viability. The indicative capacity figure appears to have been determined based on a crude calculation of density per hectare and does not take account of site specific conditions or constraints which would generate a requirement for finer grain analysis and consideration of higher densities and residential yield. It follows that the allocation as drafted fails to optimise the development potential of the Site. This is in direct conflict with the aspirations of the London Plan and the overarching strategic objective to secure sustainable development and make most effective use of land as set out by national and local policy. On this basis, the Regulation 19 Draft Local Plan as drafted does not meet the tests of soundness identified at Paragraph 35 of the National Planning Policy Framework ('NPPF'). Specifically, it is not justified or effective and is inconsistent with the provisions of the National Planning Policy Framework and the London Plan 2021. In failing to plan positively to realise the potential / capacity of the Site the Council serves to place unnecessary and undue stress on other areas of the Borough and elsewhere in Greater London to meet an identified requirement for the delivery of new homes.</p> <p>Our client strongly advocates that in order to help realise these aspirations and for the Local Plan to be found 'sound', the Council should make material amendments to the Local Plan in order to capture greater potential for the redevelopment and / or intensification of existing brownfield land such as that at the Site.</p> <p>We trust that the content of this consultation response will be considered fully by the Local Planning Authority ('LPA') and afforded the appropriate level of weight in preparing the next version of the Local Plan. Our client recognises the importance of the planning policy framework to help it and its partners realise their respective ambitions and look forward to working with the Council to develop an appropriate framework to create the certainty of outcome required to enable the Site to be brought forward for development with confidence.</p>	<p>and infrastructure network needs of residents and communities. The Council considers that the new Local Plan, through its spatial strategy, site allocations and planning policies provides a sound platform for securing this objective – both through plan-making and decision-taking.</p> <p>The Council highlights that the new Local Plan must be read and considered in its entirety. The new Local Plan site allocations identify indicative development capacities – the emphasis being upon the word "indicative". The capacity figures identified within the new Local Plan are very much a starting point on a journey to identifying and securing optimal development capacities.</p> <p>In turn, the development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>The Council concludes that the new Local Plan's master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p> <p>Finally, the Council notes the comments raised in relation to development viability.</p>	<p>each site's capacity to accommodate higher density and potentially taller development. The Council could seek to deploy this, if necessary, either in response to Inspector's MIQs or at the hearing sessions.</p>

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							<p>The Site As set out above, our client's land ownership comprises the purpose built Homebase retail warehouse located off Beckenham Hill Road/Bromley Road in Catford.</p> <p>The Site extends to circa 1.7 hectares and comprises previously developed land in the form of an existing retail store and associated car park. The principal vehicle access and egress to the Site is via Beckenham Hill Road with an additional exit only on to Bromley Road. Land uses surrounding the Site are predominantly residential and range from traditional two storey semidetached properties to the south and north-west, three storey flats to the south and north east and taller modern flatted developments of five to nine storeys located to the north. To the east of the Site on the opposite side of Bromley Road is St Johns Church (Grade II listed), a two storey community building known as the Green Man and a Fiat garage. To the rear of the Site is Catford Wanderers Sports Club. The Site has a PTAL Rating of 3 and therefore benefits from 'good' accessibility by a range of modes of public and sustainable modes of transport. The Site is not in a Conservation area, although St Johns Church (Grade II Listed Building) is located to the east on the opposite side of Bromley Road. The Environment Agency's flood risk map shows the majority of the site to be in Flood Zone 2 meaning that there is a medium probability of potential flooding.</p> <p>Representations to the Local Plan Regulation 19 Consultation The Publication Draft Local Plan consultation seeks to identify sites to meet Lewisham's need for housing, employment sites and other uses. It is further stated that Allocations are identified as the key sites which are considered to assist with the delivery of the Borough's Spatial Strategy which targets the provision of a minimum number of new homes over the Local Plan period.</p> <p>Whilst our representations are focussed primarily on the proposed wording for the draft allocation for the Site we would note that the comments made also relate to the delivery of the wider strategic policies of the Publication Draft Local Plan by association. In particular, it is maintained that the Council's failure to optimise the development potential of appropriate sites place undue and unnecessary pressure on other parts of the Borough / other Boroughs within Greater London. We set out our responses to the relevant elements of the Publication Draft Local Plan and associated evidence base below. These have considered the emerging Local Plan in the context of the requirements established by the National</p>	<p>It is acknowledged that policy interventions can, under certain specific circumstances, have an impact on development viability – and in the very worst cases can prevent growth coming forward in a timely fashion. For that reason, the Council has sought to fully integrate viability testing across the plan-making. This forms part of the new Local Plan's technical evidence base. It is noted that the latest viability evidence demonstrates that there is no adverse impact of the new Local Plan's policies at plan-level.</p> <p>Nevertheless, should exceptional site-specific circumstances present themselves there is sufficient flexibility within national planning policy and guidance to inform decision-taking. Within that context it is for development partners to present a sound case that justifies an exceptional approach to this issue should it demonstrably arise.</p>	

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							<p>Planning Policy Framework (July 2021) and London Plan 2021 (March 2021). The representations are also made in the context of pre-application discussions between our client and the LPA during 2019 to 2022 in respect of an emerging development scheme for the Site.</p> <p>Part Three: Lewisham's Neighbourhoods and Places Lewisham's South Area Site Allocation 10 Homebase / Argos, Bromley Road The Site is currently proposed as an allocation for comprehensive residential-led mixed use redevelopment within Lewisham's South Area under Reference: '10 Homebase / Argos, Bromley Road'. It is stated that the allocation has an indicative development capacity of 141 net residential units and 5,694 sq. m of gross non-residential floorspace. The proposed allocation sets out that the intensification of the Site, along with the introduction of a wider range of uses, will provide a more optimal use of land. Furthermore, any proposals for redevelopment of the Site would need to accord with a series of and requirements and guidelines linked to delivery of new and improved public realm, green infrastructure and positive frontages.</p> <p>Our client supports the principle of the emerging allocation of the Site for comprehensive redevelopment which can help to meet strategic objectives in terms of residential land supply, economic growth and employment generation within Catford in the mid to long term.</p> <p>However, it is noted that the ability to secure such objectives will only be realised if a viable development scheme can be delivered at the Site. As currently drafted, the Regulation 19 Draft Local Plan would impose onerous limitations on the allocation of the Site which our client seeks to address further below.</p> <p>Residential Yield As set out above, the site allocation at Homebase / Argos, Bromley Road on Bromley Road is identified to deliver an indicative development capacity of 141 net residential units. Whilst our client acknowledges the stated capacity is quoted for indicative purposes it is still felt that this should be increased such that it more accurately reflects the potential of the Site rather than suggest an applied limit which would only serve to stifle development. The initial design concepts presented during pre-application discussions with the Council have demonstrated that the capacity of the Site significantly exceeds that which is currently identified by the emerging allocation. Critically, given the high existing use value of the existing use, any residential led scheme will need to</p>		

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							<p>exceed the indicative capacity which is set by the allocation to realise the objective of comprehensive redevelopment of the Site.</p> <p>A lower density scheme in line with the indicative capacity would mean that the opportunities offered by the site cannot be realised during the Plan period. The effect of this would be to: 1. Reduce the housing supply generated by Site Allocations by 141 units which increases the demand placed on other, less suitable sites; and 2. Lose wider benefits linked to comprehensive redevelopment including the delivery of more appropriate, in terms of configuration and mix, commercial space and improved layout and public realm. On the basis that the Site has been specifically identified as suitable for residential uses, and the quantum of development required to facilitate a viable scheme would be significant, the indicative capacity should be increased to circa 300-350 units. This would be more consistent with the Plan's strategic focus of delivering housing land supply on previously developed and brownfield sites, the optimisation of housing delivery and a 'design led' approach set by the London Plan. The proposed intensification of the Site in this manner would help to meet the Borough's need for additional residential units in a preferred and sustainable location. It would also ensure that the delivery of a residential led development at the Site can make a significant contribution towards public amenity and accessibility (re-establishing connections with existing green spaces) as envisaged by the allocation. Given that site allocations are the key strategic reservoir for new homes within the Borough the deliverability of these will be critical in order for the Council to meet their housing targets. For policy to rely on a crude calculation that does not reflect proper consideration of the spatial characteristics or deliverability of individual sites is not in our view a sound approach. Specifically, we would question the logic of placing onerous restrictions on the capacity of allocations without undertaking more site specific analysis as part of the evidence base or detailed design development through the planning process. It follows that, as drafted, the emerging allocation at Homebase / Argos, Bromley Road on Bromley Road fails to recognise the opportunity and true capacity of the Site and in that regard is unsound. We would request that the indicative development capacity for the allocation is increased to circa 300 – 350 net residential units to ensure that this is consistent with national policy and justified.</p> <p>Commercial Land Uses As set out above, the site allocation at Homebase / Argos on Bromley Road is identified to deliver an</p>		

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							<p>indicative development capacity of 5,694 sq.m of gross non-residential floorspace. Whilst the proposed inclusion of compatible main town centre uses is supported in principle it is considered that greater flexibility should be afforded to deliver these without reference to such a prescriptive capacity figure. Specifically, a lower quantum of non-residential floorspace can still contribute towards the aspirations for the A21 Corridor in terms of creating positive frontages along Bromley Road and Beckenham Hill. This could include the provision of retail uses which would help to meet shopping requirements locally and contribute to creating a sustainable, mixed use development by meeting the needs of a new residential community at the Site. This would also reflect the existing and established land uses at the Site and enable sufficient flexibility for the delivery of an appropriate mix and quantum of land uses. It is noted that the established retail use at the Site is not protected and the redevelopment of the floorspace for alternative land uses is therefore acceptable in principle. Additionally, the Site is located over 300m from a primary shopping area or town centre boundary and would be identified to be 'out-of-centre' site for the purposes of assessing proposals for main town centre uses. It follows that the identification of such a significant quantum of non-residential floorspace does not accord with the objectives of the NPPF or London Plan. Furthermore, the initial design concepts presented during pre-application discussions with the Council have demonstrated that a residential led, mixed use scheme would not support such a substantial quantum of nonresidential space as that currently identified (5,694 sq. m). Our client would therefore request that the allocation be revised to remove an indicative capacity figure for gross non-residential floorspace in favour of referring to the fact that the delivery of main town centre uses is supported as part of a residential led redevelopment scheme. This would ensure that the allocation relates to a viable scheme which can be realised and accords with the strategic policies of the Regulation 19 Draft Local Plan which seek to adopt a 'town centre first' approach for the introduction of main town centre uses. In summary, the identification of an indicative development capacity of 5,694 sq. m for main town centre uses is not supported by market conditions, emerging policy or the Council's own evidence base. It follows that explicit reference to a specific quantum should be removed from the allocation in order to ensure that this sound and based on the supporting evidence base for the emerging local plan.</p> <p>Summary and Conclusion In summary, our client strongly supports the overall principles of redevelopment and</p>		

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							<p>regeneration as set out within the emerging Local Plan. It also reiterates its support for the allocation of the Homebase / Argos site on Bromley Road and is fully aligned with the Council's aspiration to deliver comprehensive redevelopment here. However, it is requested that the Council afford proper consideration to the commercial realities that are integral to the realisation of this allocation. Specifically, for this to be realised, it will be necessary to adopt a more flexible approach in terms of capacity, densities and land uses. As drafted, the current allocation does not optimise the site to deliver the maximum number of homes and retains an inflated quantum of non-residential floorspace which is not supported by strategic policies of the emerging Local Plan or the Council's evidence base. This is in direct conflict with the aspirations of the London Plan and the overarching strategic objective to secure sustainable development and make most effective use of land as set out in the NPPF.</p> <p>It follows that the Regulation 19 Draft Local Plan, and particularly in regard to the allocation at Homebase / Argos on Bromley Road, does not meet the tests of soundness identified at Paragraph 35 of the NPPF. Specifically, it is not justified or effective and is inconsistent with the provisions of national policy. We trust that these formal representations will be afforded the appropriate weight by the LPA and assist in the formulation of the emerging Local Plan. We would also be grateful if you could acknowledge receipt of these representations and keep us updated of any further stages of consultation, so that we can provide comments as may be required.</p>		
CON060	REP333	SANTANDER C/O LASALLE INVESTMENT MANAGEMENT			2	QD4	<p>Part Two: Managing Development QD4 Building Heights Policy QD4 states that 'tall buildings'1 will only be considered acceptable in-principle in the locations identified at Figure 5.1 as being appropriate for tall buildings.</p> <p>Whilst our client acknowledge the requirement to adopt a strategy for the delivery of tall buildings within the Borough the policy as currently drafted is considered to be overly restrictive and greater flexibility should be introduced to ensure the delivery of residential units can be optimised. This is particularly relevant for sites which are proposed to be allocated for residential-led development and therefore expected to contribute to the housing supply. The appropriateness of the final level of density can only be judged on a site by site basis. This will need to take into consideration a range of matters linked to accessibility, quality of accommodation and place, amenity and social infrastructure. The strategic designation for the Site on Bromley Road is for</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 4 Building heights.</p> <p>The comment that the new Local Plan's approach towards site capacities, building heights and site optimisation is noted.</p> <p>The Council highlights that the new Local Plan must be read and considered in its entirety.</p> <p>The development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham,</p>	No further action required in relation to the new Local Plan.

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							<p>growth and intensification. In order to increase the development capacity on brownfield land and to ensure development viability at strategic sites, the policy should not look to unduly restrict building heights. The restriction on tall buildings outside of those locations identified as 'Suitability Zones' on the Policies Map without would undermine the opportunity to increase development capacity, which in turn affects the regeneration opportunity.</p> <p>Our client requests that additional wording is added to Policy QD4 to take account of the scope to consider higher densities at those site allocations located outside of Tall Building Suitability Zones and confirm support for redevelopment of these where the criteria outlined at part D of the policy are demonstrated. This will ensure that the policy is sufficiently flexible to ensure that the strategic objectives and allocations to secure the Council's development needs are deliverable.</p>	<p>QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>The Council acknowledges and reiterates that development proposals for site allocations should be considered on a "site by site" basis. The site-specific master planning and/ or design-led approach required by the new Local Plan provides an appropriate and sound mechanism to do so.</p> <p>The new Local Plan Policy QD 4 Building Heights has been prepared in partnership with the Greater London Authority – a key strategic plan-making partner. It is consistent and conformity with the London Plan Policy D9 Tall Buildings, which requires that local plans – "...identify locations where tall buildings may be an appropriate form of development..." and "...in these locations, determine the maximum height that could be acceptable." (London Plan Policy D9 Tall Buildings Paragraph 3.9.2).</p> <p>The Council concludes that the new Local Plan's master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p>	
CON060	REP334	SANTANDE R C/O LASALLE INVESTMEN			2	HO 1	<p>HO1 Meeting Lewisham's housing needs</p> <p>The NPPF requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy HO 1 Meeting Lewisham's housing needs – specifically in relation to the scale of new</p>	No further action required in relation to the new Local Plan.

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		T MANAGEM ENT					<p>applied locally. Local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the NPPF, and should be aspirational but realistic to address spatial implication of economic, social and environmental dimensions. Planning policies should amongst other things be ‘flexible enough to accommodate needs not anticipated in the plan...to enable a rapid response to changes in economic circumstances’3.</p> <p>Paragraph 120 states that planning policies should encourage multiple benefits from urban land. At the heart of the above is a presumption in favour of sustainable development which for plan-making means positively seeking opportunities to meet development needs of an area, and be sufficiently flexible to adapt to rapid change. As the new Lewisham Local Plan emerges, it is important that it adheres to the requirements of the NPPF in positively promoting new development in sustainable locations across the Borough.</p> <p>Policy HO1 of the Regulation 19 Draft Local Plan confirms that the Borough will seek to meet the London Plan set target of 16,670 net housing completions over a ten-year period from 2019/20 to 2028/29 for Lewisham. However, as this does not identity the housing need for the Borough beyond 2029, the Council has considered it appropriate to ‘roll-forward’ the Borough’s London Plan annual housing target to produce a 15-year target of 27,730 net housing completions.</p> <p>It is noted that such targets are not a ceiling and are encouraged to be exceeded. Table 13.1 of the Regulation 19 Draft Local Plan states that site specific allocations have been identified with the potential capacity to deliver a minimum of 24,413 net new homes over the plan period. The Council has sought to supplement this with large consented sites and the trend-based windfall delivery rates in the Borough to demonstrate sufficient capacity to exceed the 10 year London Plan target and the NPPF housing target over a five and 15-year period.</p> <p>We consider this approach to be unsound on the basis that this fails to adequately consider the Boroughs most recent trends in housing delivery which is substantially below London Plan targets. Critically, it is noted that the Lewisham Authority Monitoring Report 2021-22 (December 2022) identifies that the Council only achieve 88% of its housing target for 2021 and</p>	<p>housing need being planned-for through the new Local Plan and how it will be delivered.</p> <p>The Council acknowledges the National Planning Policy Framework and the guidance that it provides the plan-making process. The Council maintains that the new Local Plan has been prepared in accordance with national policy and is in that respect sound.</p> <p>The respondent is correct in noting that the new Local Plan identifies that</p> <p><i>“The Council will work positively and proactively with stakeholders, including development industry partners, to facilitate a significant increase in the delivery of new homes to help meet Lewisham’s housing needs. Development proposals must make the best use of land and optimise the capacity of housing sites in order to ensure:</i></p> <p><i>a. The London Plan ten-year target is exceeded through the delivery of at least 16,670 net housing completions during 2019/2020 to 2028/2029 (equivalent to 1,667 p.a.); and</i></p> <p><i>b. The NPPF 15-year target is exceeded through the delivery of at least 27,730 net housing completions from the anticipated start date of the local plan, 2023/24 to 2037/38 (equivalent to 1,667 net completions p.a. plus additional completions during the first five years to cater for the current backlog (461 p.a.) and the application of a 5% buffer (83 p.a.).”</i></p> <p>For clarity, the Council highlights that in both cases the new Local Plan is seeking to exceed the housing needs (starting position) identified through the London Plan. It is unclear why the respondent considers this unsound.</p>	<p>Although Officers are not proposing that any modifications be made in respect of the site allocation specific development capacities, the Council could consider undertaking a separate exercise to identify and assess the possible uplift that higher intensity development could offer. This could inform a parallel decision/discussion on whether the Council’s proposed 5% buffer is sufficient to secure a sound new Local Plan. The possible assessment of site uplift should seek to identify a RAG rate for each site’s capacity to accommodate higher density and potentially taller development. The Council could seek to deploy this, if necessary, either in response to Inspector’s MIQs or at the hearing sessions.</p>

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							<p>87% for 2022. This has resulted in a requirement to produce an 'Action Plan' to address past under-delivery alongside the introduction of a 20% buffer for the purposes of calculating supply.</p> <p>The December 2022 Monitoring Report recognises that it will become increasingly challenging to meet the Housing Delivery Test in future years given the low level of completions in the last two years, and it is probable that Lewisham will need to start planning for a 20% buffer in the near future.</p> <p>For these reasons it is fundamental that the Council seeks to boost the future housing land supply through ensuring that all site allocations have been fully optimised. This will ensure that there is a sufficient buffer within the Borough's housing supply to account for any sites that are not delivered as currently intended. It follows that the redevelopment of site allocations will be critical to the realisation of the Council's ability to meet its required housing targets for the Borough. This is an important consideration in respect of the context for determining the appropriateness of any limitations proposed by individual allocations.</p>	<p>The comments made in relation to the spatial strategy for exceeding the London Plan and standard method housing figures are noted.</p> <p>For clarity, the new Local Plan identifies a spatial strategy for the Borough under Policy OL 1 Delivering an Open Lewisham (spatial strategy). This directs growth and infrastructure investment to the most suitable and sustainable locations across the Borough. This approach is supported by the general planning policies and site allocations.</p> <p>The Council highlights that contrary to the statement made by the respondent, in addition to the growth centres, nodes and corridors, the new Local Plan identifies 75 site allocations. These range for large strategic sites through to smaller development opportunities. Experience demonstrates that this an expansive and diverse schedule of opportunities – that is far removed from limited range of site allocations cited in the representation.</p> <p>In addition, the new Local Plan has a sound approach towards the delivery of small site opportunities. This is primarily set out under new Local Plan Policy HO 2 Delivering an Open Lewisham (spatial strategy), but also supported through Policy HO 9 Self-build and custom-build housing.</p> <p>The comments made in relation to the possible future outcomes of the Housing Delivery Test are noted. It is highlighted that currently Lewisham is meeting the requirements of the Test and is not facing any of the punitive measures. Nevertheless, the Council is seeking to introduce measure that will seek to provide greater certainty of delivery going forward – to maintain a steady housing land supply. It is noted that although the Test focusses upon and penalises the local</p>	

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								<p>planning authority – in most respects the factors governing delivery are in fact beyond their control. Mooted changes to national planning policy may address this fact. The Council welcomes the introduction of measures that would hold development partners to full account for their performance.</p> <p>Finally, the suggested increase in the % Buffer (as set out under NPPF Para 74) is noted. The Council considers the proposed increase to 20% - as per NPPF Para 74 C – to be excessive, unnecessary, and unjustified. The Council also notes that increasing the buffer to this excessive limit is unlikely, by itself to secure an enduring uplift in housing delivery.</p> <p>The Council considers that many of the barriers facing housing delivery, in Lewisham, are beyond the ability of plan-makers to currently address. The Council concludes that development industry partners must shoulder some of this burden.</p>	
CON061	REP335	Fairview New Homes			3	LSA SA 10	<p>Following the release of Lewisham Reg 19 Local Plan: Proposed Submission document, Fairview are writing on behalf of the current Landowner to support the proposed allocation of the Homebase/Argos, Bromley Road.</p> <p>Nevertheless, we consider that the current allocation does not maximise the site potential meaning the existing proposed allocation is unsound.</p> <p>The London Plan has set a 10 year strategic housing target for Lewisham of 16,670 or 1,667 completions per year. In addition to this, Lewisham needs to cater for its current backlog and provide a 5% buffer (soon to be 20%) in accordance with the NPPF. Therefore, the Council should be seeking to maximise housing delivery on all proposed allocations, including the Homebase/Argos Bromley Road site.</p> <p>The Site The site is approximately 1.70ha and currently comprises a large retail warehouse with car parking, service yard and a pond. A sports club including Tennis courts and playing fields (allocated Urban Green space) are located immediately to the</p>	<p>The Council notes and welcomes the support offered to the overarching aspirations for investment and growth within Lewisham as detailed through the new Local Plan.</p> <p>The Council also notes the more detailed comments set out in relation to the new Local Plan Policy LSA SA 10 Homebase/ Argos, Bromley Road. The respondent's stated objection to the use and identification of indicative capacities is noted.</p> <p>The Council remains committed to working with development partners to facilitate the delivery of planned-for growth across the Borough – inclusive of meeting the housing, employment, town centre, retail, and infrastructure network needs of residents and communities. The Council considers that the new Local Plan, through</p>	<p>No further action required in relation to the new Local Plan.</p> <p>Although Officers are not proposing that any modifications be made in respect of the site allocation specific development capacities, the Council could consider undertaking a separate exercise to identify and assess the possible uplift that higher intensity development could offer. This could inform a parallel decision/ discussion on whether the Council's proposed 5% buffer is sufficient to secure a sound new Local Plan. The possible assessment of site uplift should seek to identify a RAG rate for each site's capacity to accommodate higher density and potentially taller development.</p>

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							<p>west, while Bromley Road and Beckenham Hill form the sites southern and eastern boundary. Rear gardens of the residential properties which front Southend Lane adjoin the site to the north. The site is not in a Conservation area, although St Johns Church (Grade II Listed Building) is located to the east on the opposite side of Bromley Road.</p> <p>Land uses surrounding the site are predominantly residential with associated green space. This ranges from traditional two storey semi-detached properties to the south (Beckenham Hill Road) and northwest (Southend Lane), three storey flats to the south (Beckenham Hill Road) and north east (Bromley Road) and then taller modern flatted developments to the north. The taller developments include:</p> <ul style="list-style-type: none"> ▪ Deslandes Place (five storeys) ▪ Nayland House (eight storeys) ▪ Astral House (six to nine storeys) <p>The closest train station is Beckenham Hill which is 360m to the southwest. The Site is also located within short walking distance of several bus stops, the closest being located directly outside the Site on Beckenham Hill Road.</p> <p>Current Allocation</p> <p>The site as allocated is identified as an out of town centre retail unit and car park. Additionally, the allocation confirms the site is 1.70(ha) and located in an urban setting with a PTAL of 3. An indicative capacity of 141 residential units and 5,694sqm of retail use has been identified.</p> <p>Within the allocations supporting text, the site is identified as benefiting from good levels of transport accessibility and its redevelopment offers scope for public realm improvements to support walking and cycling. Several development requirements are set out in the allocation including, the proposals coming forward in accordance with the A21 development framework, introducing positive frontages along Bromley Road and Beckenham Hill, re-integration into the surrounding street network, delivering new and improved public realm and open spaces, and seeking to enhance green infrastructure.</p> <p>Overall, the current allocation does not ensure the optimal capacity for the site will be delivered. The allocation therefore does not comply with National, Regional, and other emerging policies within the Reg 19 plan (specifically QD6 Optimising site capacity). The allocation in its current form is therefore unsound.</p>	<p>its spatial strategy, site allocations and planning policies provides a sound platform for securing this objective – both through plan-making and decision-taking.</p> <p>The Council highlights that the new Local Plan must be read and considered in its entirety. The new Local Plan site allocations identify indicative development capacities – the emphasis being upon the word “indicative”. The capacity figures identified within the new Local Plan are very much a starting point on a journey to identifying and securing optimal development capacities.</p> <p>In turn, the development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>The Council concludes that the new Local Plan’s master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p> <p>The Council notes the work undertaken by the respondent and invites them and the other relevant interests across the site allocation to positively engage through the decision-taking process, which allows for</p>	<p>The Council could seek to deploy this, if necessary, either in response to Inspector’s MIQs or at the hearing sessions.</p>

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							<p>Revised Allocation</p> <p>Fairview has undertaken a capacity study of the site, which has demonstrated that the site has capacity for c.350 dwellings and up to 250sqm of Class E floorspace. The emerging allocation should therefore be revised to ensure this can be achieved.</p> <p>350 dwellings and up to 500sqm of retail floorspace is achievable within the existing site constraints. Within the emerging plan, the site is identified as a location with some suitability for tall buildings. Based on this, the site is suitable for some 10 storeys elements with the remainder between 6 and 8 storeys. These heights are similar to surrounding developments such as Astral House and are therefore within the character of the local area.</p> <p>A scheme of this quantum allows for the retention and improvement of the existing pond and provides improvements to support walking and cycling as currently required by the allocation. Additionally, the proposed retail provision could be located along Beckenham Hill Road, providing the positive active frontage sought.</p> <p>The revised allocation would result in an increased density of 205 dwellings per hectare which is more appropriate for the site, especially considering its proximity to Beckenham Hill Station.</p> <p>The following revisions are required for the allocation to be considered sound:</p> <ul style="list-style-type: none"> ▪ A decrease in the amount of retail floorspace being re-provided; and ▪ An increase in the proposed indicative residential capacity. <p>Reduced Retail Provision</p> <p>As part of the revised allocation, it is recommended that the amount of retail floorspace proposed to be re-provided is reduced to reflect the present and future retail demand. In our experience, there is currently extremely limited demand for large scale out of centre retail warehouse developments, with many large footplate stores underperforming to the extent that operators consider the stores unviable. This is evidenced by the number of Homebase stores which have been redeveloped in the last 5 years. Since August 2018, when 42 initial stores were put on the market, with a few exceptions, all have been redeveloped. Including two by Fairview New Homes. Therefore, from a developer perspective there is no justification for providing a similar size store to the existing homebase.</p>	<p>the full consideration of the detailed matters being raised. This is inclusive of the proposal to reduce the scale of retail provision across the site.</p> <p>The Council acknowledges that it has “rolled forward” the current London Plan housing requirement. The Council believes that in the absence of alternative approaches (the respondent has not suggested any) this provides a sound platform for maintaining and boosting the supply of housing. This is in accordance with national planning policy. In contrast, it is noted that the Greater London Authority, in their representation, has suggested that the new Local Plan could consider setting a bespoke housing requirement for Lewisham that in their words would be lower (than the rolling forward approach). The Council does not believe that this would be desirable.</p> <p>For clarity, the new Local Plan identifies a spatial strategy for the Borough under Policy OL 1 Delivering an Open Lewisham (spatial strategy). This directs growth and infrastructure investment to the most suitable and sustainable locations across the Borough. This approach is supported by the general planning policies and site allocations.</p> <p>The Council highlights that contrary to the statement made by the respondent, in addition to the growth centres, nodes and corridors, the new Local Plan identifies 75 site allocations. These range for large strategic sites through to smaller development opportunities. Experience demonstrates that this an expansive and diverse schedule of opportunities – that is far removed from the limited range of site allocations cited in the representation.</p> <p>In addition, the new Local Plan has a sound approach towards the delivery of small site opportunities. This is primarily set out</p>	

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							<p>Additionally, as identified in the Lewisham Retail Impact Assessment and Town Centre Trends Report produced by Lichfields (December 2021), due to market conditions, the <i>'bulky goods warehouse sector has rationalised'</i> and <i>'scaled down store sizes.'</i> This is particularly the case for premises within the bulky goods sector (which includes DIY goods) where demand for premises <i>'has been particularly weak in recent years.'</i> This has led to voids in retail warehouse parks and proposals to extend the range of goods sold to non-bulky. Lichfields forecast this pressure to shift from bulky to non-bulky comparison goods is likely to continue which shows a lack of demand for Homebase type stores.</p> <p>The lack of desire for large retail warehouses is also supported in policy. The site does not form part of an allocated (currently or emerging) Major, District or Local Centre and does not form part of a primary shopping area. It is therefore not protected by planning policy. Additionally, the site is over 300m from a primary shopping area or town centre boundary. Therefore, in retail terms, the site is an out of centre location.</p> <p>Both national and emerging local policies identify that town centres are at the heart of communities and developments should support and help to secure the long-term vitality and viability of town centres (emerging policy EC11). Emerging policy EC12 will also result in the adoption of a 'town centre first' approach for main town centre uses with sequential testing required for all retail uses and retail impact assessments required for retail uses of 500sqm gross floorspace or more at out of centre locations. The emerging policy states that development proposals will be refused unless the impact assessment identifies a need and market demand for the amount and type of floorspace proposed and the proposals will not adversely impact the vitality and viability of Lewisham town centre network and hierarchy. Therefore, emerging local plan does not support out of centre retail development.</p> <p>Furthermore, Lichfields' report states that should the comparison goods floorspace within retail warehouses not be replaced (following redevelopment), <i>'then comparison goods expenditure should be released for other shopping destinations... This released comparison good trade could assist growth in shopping facilities within the main centres in Catford and Lewisham'</i> - town centre locations supported by emerging policies. The report also identifies that when commercial floorspace is re-provided on retail warehouse redevelopments,</p>	<p>under new Local Plan Policy HO 2 Delivering an Open Lewisham (spatial strategy), but also supported through Policy HO 9 Self-build and custom-build housing.</p> <p>The comments made in relation to the proposed Bakerloo Line Extension are noted. The Council supports the delivery of this key piece of strategic transport infrastructure. Once complete the Bakerloo Line Extension has the potential to facilitate and support growth across South East London – beyond Lewisham's administrative boundary. Equally, it will bring wider benefits across the whole Capital. However, for clarification – whilst the Bakerloo line extension is critical to the achievement of the Borough's growth and regeneration objectives, that is within a wider strategic timeframe that is beyond the new Local Plan's fifteen-year lifespan. The Council maintains that this approach to strategic infrastructure investment is in accordance with national planning policy.</p> <p>The comments made in relation to the possible future outcomes of the Housing Delivery Test are noted. It is highlighted that currently Lewisham is meeting the requirements of the Test and is not facing any of the punitive measures.</p> <p>Nevertheless, the Council is seeking to introduce measure that will seek to provide greater certainty of delivery going forward – to maintain a steady housing land supply. It is noted that although the Test focusses upon and penalises the local planning authority – in most respects the factors governing delivery are in fact beyond their control. Mooted changes to national planning policy may address this fact. The Council welcomes the introduction of measures that would hold development partners to full account for their performance.</p>	

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							<p>it is normally flexible and at a scale commensurate with the amount of residential and employment uses within the development.</p> <p>Therefore, the current proposed allocation of 5,694sqm is not supported by market conditions, emerging policy or the Council's evidence base. Rather, the Council's Retail Impact Assessment supports the provision of a smaller more flexible amount of commercial floorspace with the aim of serving the proposed development. Up to 500sqm is therefore suitable for the site and sound, based on the supporting evidence for the emerging local plan.</p> <p>Housing Need As recognised in the emerging local plan, the Mayor of London has challenged all London Boroughs to deliver a significant increase in housing to meet current and future needs across the Capital. For Lewisham, the London Plan has set a 10 year strategic housing target of 16,670 net housing completions (1,667 per annum). However, as this does not identity the housing need for the Borough beyond 2029, the Council has considered it appropriate to 'roll-forward' the Borough's London Plan annual housing target to produce a 15-year target of 27,730 or 1,667 per annum.</p> <p>Supporting paragraph 7.4, states the emerging Local Plan has identified specific site allocations which have the potential capacity to deliver 24,413 (1,221 per annum) over the lifetime of Plan (20 years). To make up for the shortfall against the London Plan target, the Council are relying on existing consented sites and the historic trend-based windfall delivery rates to make up for any short coming over the plan period.</p> <p>We consider this approach is unsound and fails to adequately consider the Boroughs most recent trends in housing delivery which was substantially below London Plan targets (2021-22 Monitoring Report). The Monitoring Report identifies the Council only achieved 88% of its housing target in 2021 and 87% 2022. Both only slightly above the national threshold for the introduction of the 20% buffer. The report concludes it will become increasingly challenging for the Council to meet the Housing Delivery Test in future years, given the low level of completions in recent years and that Lewisham '<i>needs to start planning for a 20% buffer in the near future</i>'.</p> <p>Furthermore, supporting Paragraph 7.4 also acknowledges the need for critical strategic transport infrastructure, particularly the Bakerloo Line extension, to unlock the development</p>	<p>Finally, the suggested increase in the % Buffer (as set out under NPPF Para 74) is noted. The Council considers the proposed increase to 20% - as per NPPF Para 74 C – to be excessive, unnecessary, and unjustified.</p> <p>The Council considers that many of the barriers facing housing delivery, in Lewisham, are beyond the ability of plan-makers to currently address. The Council concludes that development industry partners must shoulder some of this burden.</p>	

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							<p>potential of areas and to optimise the capacity of sites. Should this infrastructure be delayed, it will result in considerable shortfall in the housing supply with allocated sites being unable to come forward within the lifetime of the emerging plan.</p> <p>For these reasons it is fundamental that the Council ensure that all emerging allocations have been fully optimised to ensure that there is a sufficient buffer to accommodate sites being delayed, falling away and to make up for the recent shortfall in delivery. If the plan does not do this, it is not sound.</p> <p>Currently the Homebase/Argos Bromley Road allocation has a density of 82 dwellings per hectare (dph). The table below provides a summary of similar sites within Lewisham’s South Area with a similar or worse PTAL to the Homebase/Argos site:</p> <table><tr><th>Site Allocation</th><th>Number of Units</th><th>Site Area</th><th>PTAL</th><th>dph</th></tr><tr><td>Former Bell Green Gas Holders and Livesey Memorial Hall</td><td>442</td><td>2.16</td><td>2</td><td>205</td></tr><tr><td>Bell Green Retail Park</td><td>1831</td><td>7.37</td><td>1b-2</td><td>248</td></tr><tr><td>Sainsbury’s Bell Green</td><td>1,347</td><td>5.42</td><td>2-3</td><td>249</td></tr><tr><td>Stanton Square Locally Significant Industrial Site</td><td>231</td><td>0.97</td><td>3</td><td>238</td></tr><tr><td>Sydenham Green Group Practice</td><td>87</td><td>0.49</td><td>2-3</td><td>178</td></tr><tr><td>Worsley Bridge Road Locally Significant Industrial Site</td><td>179</td><td>1.26</td><td>2-3</td><td>142</td></tr></table> <p>The table demonstrates that each of these sites benefits from a far higher dph despite having a similar or worse PTAL. Whilst density is only a guide, our own designs demonstrate that a scheme of 350 dwellings is deliverable on the proposed allocation.</p> <p>Our proposed amendment to the allocation would increase the allocations density to 205 dwellings per hectare in line with above allocations. We therefore contend that this is an acceptable density for a PTAL 3 site within the southern area.</p> <p>Revising the emerging allocation to c.350 units will assist the Council in meeting its on-going housing need, by fully optimising the site and allowing the allocation to be considered sound.</p> <p>Conclusion Lewisham Council has allocated Homebase/Argos Bromley Road to provide 141 residential units and 5,694sqm of retail use. We consider the current allocation does not optimise the site to deliver the maximum number of homes and retains comparison retail floorspace where it is not supported by market demand, emerging policies or the Council’s evidence base. This results in the Council failing to plan positively to</p>	Site Allocation	Number of Units	Site Area	PTAL	dph	Former Bell Green Gas Holders and Livesey Memorial Hall	442	2.16	2	205	Bell Green Retail Park	1831	7.37	1b-2	248	Sainsbury’s Bell Green	1,347	5.42	2-3	249	Stanton Square Locally Significant Industrial Site	231	0.97	3	238	Sydenham Green Group Practice	87	0.49	2-3	178	Worsley Bridge Road Locally Significant Industrial Site	179	1.26	2-3	142		
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							<p>address it's housing need, leading to the allocation being unsound.</p> <p>Fairview considers the optimal capacity of the site is c.350 dwellings and up to 250sqm of Class E floorspace. The emerging allocation should, therefore, be revised to reflect this and ensure the optimal capacity is achieved. Following these amendments, we consider the emerging Local Plan would be sound in respect to this allocation.</p> <p>Should you require any further information, or wish to discuss the site in more detail, please do not hesitate to contact me.</p>		
CON062	REP336	GR Planning OBO HHGL Ltd			3	LSA SA 10	<p>REPRESENTATIONS BY HOMEBASE LTD TO THE REGULATION 19 VERSION OF LEWISHAM LOCAL PLAN IN RELATION TO HOMEBASE, BECKENHAM HILL ROAD, CATFORD</p> <p>My clients, HHGL Ltd trading as Homebase in the UK & Ireland, submitted representations to the Main Issues & Preferred Approaches Version of the Lewisham Local Plan (Reg.18 Plan) on 5 May 2021. This was followed by a Virtual Teams Meeting (VTM) with Officers on 10 June 2021 during which we outlined Homebase's position in relation to their existing store on Beckenham Hill Road in Catford.</p> <p>In summary, my clients representations confirmed that: their current lease on the Catford store extended to September 2025; that the store was successful and profitable with a loyal customer base and experienced staff; and that Homebase were committed to retaining representation within the Catford area to serve the existing customer base in the Borough of Lewisham.</p> <p>Accordingly, my clients representations to the Reg.18 Plan, reemphasised in the subsequent VTM, sought to ensure that Policy LSA4 and Site Allocation 10, which identified the Homebase as part of an opportunity site for a residential led mixed-use scheme of 141 residential units and 5,694 square metres of main town centre uses, took on board and reflected Homebase's commitment to remaining on their Beckenham Hill Road site as this was a well-established retail destination and successful store. As the draft wording of policy LSA4 and Site Allocation 10 did not recognise that commitment or provide the option for Homebase remaining on site, either as is or as part of a residential led redevelopment my clients confirmed that they strongly objected to the Reg.18 Plan.</p> <p>Within the Regulation 19 Version of the Plan the wording of Site Allocation 10 ('Homebase/Argos, Bromley Road' – the reference to 'Argos' should be deleted as this concession no</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LSA SA 10 Homebase/Argos, Bromley Road.</p> <p>It is noted that the respondent is currently a business that occupies and operates from within the site allocation. The request the policy and its supporting text be amended to reflect their position within the local economy and secure their on-site presence across the plan period is noted. Although the Council is genuinely supportive of businesses operating across the Borough and will seek to secure their retention and continued trading, there are recognised limits to what actions it can take through the plan-making process. For example, it would be unsound for the new Local Plan to commit to a specific commercial operator to a specific site – as changing economic conditions could witness the disappearance of that operator. This has happened in recent times – notably in respect of retailers such as Woolworths, House of Fraser, and Debenhams. For that reason, the Council maintains that the policy is sound. The respondent is asked to note that the policy wording does allow for the reprovion of their offer.</p> <p>The comment made in relation to the other retail operator on the site allocation; Argos; is noted. The Council will determine the factual position on this matter and consider the need to amend the policy</p>	<p>Suggest that the Council establish the factual position relating to the retail operators on-site, specifically in relation to Argos. Subject to the factual position, the Council could consider modifying the policy title accordingly. It is recommended that any new policy title/ name clearly reflect the local established name for the site – to ensure that readers are clear as to its location.</p>

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							<p>longer trades from the store) has been amended with paragraph 17.52 1. stating that the “<i>Re-provision of the existing retail use is acceptable</i>” providing other objectives for redeveloping the site can be achieved. Whilst my clients would support this change, they consider that the wording should go further so that it provides greater clarify and certainty.</p> <p>We would request, therefore, that paragraph 17.5 1. be amended to include the following:</p> <ul style="list-style-type: none"> Reference that the re-provision of the existing retail use could include a store of approximately 2,323 sqm gross with an additional garden centre of 743 sqm gross. Reference that any re-provision of the retail use must meet the operational and business requirements of the tenant and be commercially viable. Inclusion of the option of Homebase remaining on site (the status quo) and where it cannot be successfully incorporated within any redevelopment scheme the option of Homebase being relocated to an alternative site within the area. <p>We would be happy to discuss these requested changes further with Officers prior to the EIP.</p>	accordingly through the modifications process.	
CON063	REP337	Volkswagen Financial Services			3	LSA SA 11	<p>Thank you for your correspondence Re: Lewisham Local Plan: Proposed Submission Document consultation, a copy of which is attached.</p> <p>It is noted that you believe we may hold an interest as a leaseholder for part or all the land that falls within, or in proximity to, a site which you are proposing for future redevelopment. In order for us to confirm if we still have leaseholder interest in this site please can you provide the title number(s) held by the Land Registry for the plot(s) concerned.</p> <p>Furthermore, it is acknowledged that your letter was addressed to Volkswagen Group (UK) Limited (“VWG”). As a courtesy, a copy of this letter will be forwarded to our VWG colleagues in order for them to confirm whether the interest is, in fact, theirs.</p>	The Council notes the comments made in this representation.	<p>No further actions required in relation to the new Local Plan.</p> <p>Update the Council’s plan-making database to identify the respondent as the leaseholder of this specific site. Engagement with the respondent accordingly as necessary.</p>
CON064	REP338	L & Q			3	LSA SA 13	<p>LEWISHAM LOCAL PLAN – REGULATION 19 STAGE “PROPOSED SUBMISSION DOCUMENT” (JANUARY 2023)</p> <p>Dear Sir / Madam</p> <p>1. About L&Q</p> <p>L&Q is a regulated charitable housing association and one of the UK’s most successful independent social businesses. The L&Q Group houses around 250,000 people in more than 105,000 homes, primarily across London and the South-East.</p>	The Council notes and welcomes the comments made in relation to the new Local Plan Policy LSA SA 13 Excalibur Estate. The Council remains committed to working with its development industry partners to secure growth and good quality place-making in accordance with the new Local Plan.	<p>The Council will contact the site allocation promoter with the objective of securing a signed SoCG that identifies matters of agreement between the parties and a delivery trajectory.</p> <p>Indicative Capacities</p>

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							<p>As a not-for-profit organisation, L&Q reinvest all the money we make into new and existing homes, creating successful communities, and providing excellent services.</p> <p>2. L&Q in Lewisham L&Q is a major provider of homes in Lewisham, currently managing over 8,835 homes across the Borough. We see great potential in Lewisham and currently have new homes under construction at the Excalibur Estate and Timberyard.</p> <p>3. Tests of soundness L&Q welcome the opportunity to provide representations to the Proposed Submission Document of the Lewisham Local Plan (Regulation 19 – publication stage). This follows our submission of representations to the Regulation 18 stage document of the Local Plan on 9 April 2021.</p> <p>At Regulation 19 stage, submissions are required to focus on whether the proposals meet the tests of soundness as set out Paragraph 35 of the National Planning Policy Framework – a) positively prepared; b) justified; c) effective; d) consistent with national policy. We have set out below, whether we consider the Local Plan to be sound or not, and changes required to make it sound.</p> <p>4. Overview of representations Our representations focus on the Site Allocation 13: Excalibur Estate. In our Regulations 18 stage representations to the Local Plan, we highlighted the detail regarding each phase was incorrect and should be updated.</p> <p>We have reviewed the updated Site Allocation for the Excalibur Estate. There remain errors which need to be corrected, and text which we don't consider appropriate to be included in the allocation. We have summarised this below:</p> <p>ndicative development capacity – The current S106 for the Site permits 365 units to be built across the whole development, rather than 362 units identified in the Site Allocation. This should be corrected.</p> <ul style="list-style-type: none"> Listed buildings – Whilst the Site Allocation has been updated to reflect the Listed Buildings on Site, the location of these buildings is currently described incorrectly. There are two rows of Listed bungalows, one of two bungalows and one of four bungalows, rather than a single row with six bungalows. This should be corrected. 	<p>Indicative Capacities The comment relating to indicative capacity and the proposal currently awaiting S106 agreement is noted. Subject to the statement being verified the Council could consider amending Paragraph 17.65 to reflect the factually correct number of units. This can be identified as a minor modification through submission.</p> <p>Listed Buildings The comment relating to the on-site designated heritage assets (listed buildings) is noted. Subject to the statement being verified the Council could consider amending Paragraph 17.66 3 to provide a factually correct description. This can be progressed as a minor modification through submission.</p> <p>Opportunities The Council notes the comments made in relation Paragraph 17.65, specifically in relation the factual position of current on-site delivery. It is unclear to the Council why the respondent considers this a matter of soundness as it merely sets out the factual position.</p> <p>Development Guidelines The suggested additions to Paragraph 17.67 4 are noted. Whilst the Council understands why the respondent has suggested the specific amendment, the proposal itself is unsound, being unreasonable and unenforceable. The Council, as local planning authority, cannot force its infrastructure partners to engage in the decision-taking process. Nevertheless, the Council is committed to working positively with all partners involved in delivering growth and supporting infrastructure networks.</p>	<p>The Council will verify the correct number of units and correct Paragraph 17.65 accordingly as a minor modification.</p> <p>Listed Buildings The Council will verify the correct description for the on-site listed buildings and correct Paragraph 17.66 3 accordingly as a minor modification.</p>

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							<ul style="list-style-type: none"> • Opportunities - We note that exact unit numbers have been included in the Opportunities section of the allocation in the Regulation 19 version of the Local Plan. We consider this change to be too prescriptive and unnecessary given the indicative development capacity has already been set out in the main table. We recommend this additional wording is removed. • Development guidelines – The Site Allocation has been updated with additional wording, following consultation comments received from Thames Water. <p>L&Q will always work in partnership with Thames Water regarding the management of surface water and diversion of existing sewers where applicable. However, we don't consider it appropriate for references to the Evelyn Street trunk sewers to be included in the Site Allocation, especially since it is not referenced in the consultation response from Thames Water itself. If the wording is retained, we recommend the text is updated as follows:</p> <p><i>“Applicants should work in partnership with Thames Water and engage with them early to manage surface water and divert existing sewers where applicable. New connections into the Evelyn Street trunk sewers will not be allowed. Thames Water will work proactively with the landowner to provide alternative sewer locations to ensure the development can come forward in line with the Site Allocation”.</i></p> <p>Currently, as written, L&Q consider the Site Allocation for Excalibur Estate to be not sound on the basis that is ‘<i>Not Effective</i>’. However, the changes suggested above will enable the site allocation to be effective and sound in plan making terms.</p> <p>Further participation In summary, we are supportive of LB Lewisham updating its Local Plan to guide development between 2020-2040.</p> <p>These amendments to the Draft Local Plan, including the Excalibur Estate Site Allocation, will ensure the plan is effective and sound in plan making terms.</p> <p>We look forward to confirmation of receipt of these representations and request the right to be heard by the appointed examiner at the Examination in Public if we choose to participate further.</p>		

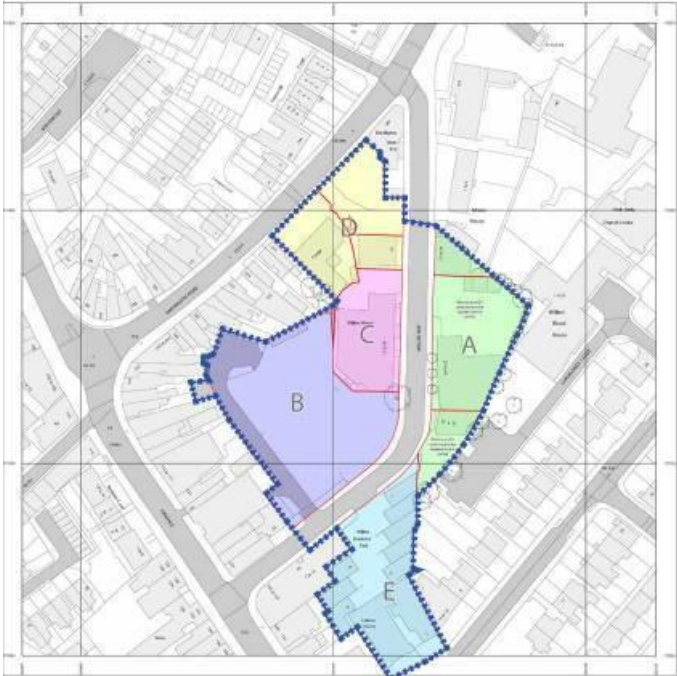
Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
CON065	REP339	NHS Property Services Ltd			3	LWA SA 03	<p>Lewisham Local Plan Proposed Submission Version</p> <p>Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS). These comments should be read alongside NHSPS's previous responses to the Local Plan at the Main Issues stage (2015) and the Main Issues and Preferred Approaches stage (2021) and the SHLAA Call for Sites consultations in 2017 and 2018.</p> <p>Foreword</p> <p>NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.</p> <p>Overview</p> <p>In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.</p> <p>NHSPS support NHS commissioners to deliver a local health and public estate that can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites.</p> <p>The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be allowed to develop, modernise or be protected in line with integrated NHS strategies. Planning policies should support this and be prepared in consultation with the NHS to ensure they help deliver estate transformation.</p> <p>Our comments on the policies set out within the Local Plan are as follows.</p> <p>Policy (site allocation)</p> <p>Site allocation Lewisham's West Area allocation 3 Jenner Health Centre allocates the site for redevelopment to provide 30 residential units and 2,081 sqm main town centre/community uses. The development requirements</p>	<p>The Council notes and welcomes the broad level of support offered in relation to the new Local Plan Policy LWA SA 03 Jenner Health Centre. The Council welcomes the wider support provided by infrastructure partners, such as those in the public healthcare sector, for the new Local Plan. The Council remains committed to working with all its infrastructure partners, both internal and external, to secure the necessary improvements to networks required to support the planned-for growth set out in the new Local Plan.</p> <p>The Council remains committed to working with development partners to facilitate the delivery of planned-for growth across the Borough – inclusive of meeting the housing, employment, town centre, retail, and infrastructure network needs of residents and communities. The Council considers that the new Local Plan, through its spatial strategy, site allocations and planning policies provides a sound platform for securing this objective – both through plan-making and decision-taking.</p> <p>The Council highlights that the new Local Plan must be read and considered in its entirety. The new Local Plan site allocations identify indicative development capacities – the emphasis being upon the word “indicative”. The capacity figures identified within the new Local Plan are very much a starting point on a journey to identifying and securing optimal development capacities.</p> <p>In turn, the development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that these relevant planning policies provide a</p>	No further action required in relation to the new Local Plan.

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							<p>attached to this application specifically require the re-provision of the existing health care facility, in line with Policy CI1.</p> <p>Although we support the in-principle allocation of this sites, we request some amendments to the wording and policy requirements to ensure the site can be brought forward in an timely manner.</p> <p>Context It is noted that Lewisham's Western Area Site Allocation 3 covers the Jenner Health Centre. An extract of the site allocation showing the area proposed as part of the Local Plan Site Allocation is set out below:</p>  <p>NHSPS own the freehold to Jenner Health Centre, and have previously promoted the site through the SHLAA Call for Sites consultations in 2018 and 2018 and Local Plan Main Issues and Preferred Approaches stage (2021) for a mixed-use residential and/or healthcare redevelopment.</p> <p>Although we support the in-principle allocation of the redevelopment of the site, we wish to provide further detail on the site's capacity and recommend alternative wording based on this information.</p> <p>Local health commissioners are currently developing a strategy for the future delivery of health services in this area. This will include identifying opportunities to reconfigure the estate to better meet commissioning needs. This could include opportunities to make more efficient use of sites, providing health services from modern fit for purpose accommodation,</p>	<p>sound approach for decision-taking. They provide development partners with an opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>For clarity, the new Local Plan has applied a standard methodological approach towards possible quantum and mix of development on site allocations. This approach has been applied consistently in circumstances where there is no certain commitment. This is considered a sound approach.</p> <p>For further clarity, the new Local Plan takes an indicative approach optimal capacity. It remains within development partner's gift to demonstrate, through technical evidence supplied through the master planning and design-led process, how a site allocation could sustainably deliver more; yet still secure successful place-shaping. The Council considers this sound.</p> <p>The Council considers that the new Local Plan's policy approach towards achieving optimal development across the Borough's site allocations and speculative sites provides a sound decision-taking platform. In respect of this site allocation, it is considered that it provides the flexibility to implement the respondent's health commissioning strategy to meet the needs of the population at any time.</p> <p>The Council concludes that the new Local Plan's master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p>	

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							<p>alongside the release of 'surplus' parts of the site for development.</p> <p>The requirements for health commissioning and the form of any health provision are a decision for local health commissioners and should not be tied down through planning policy, which can quickly become out of date. The NHS needs to retain the flexibility to implement its health commissioning strategy to meet the needs of the population at any time. The site allocation includes an indicative development capacity which is not proportionate with the expected NHS transformation plan for the area, and should therefore be amended.</p> <p>NHSPS promoted the Jenner Health Centre site to the 2017 and 2018 SHLAA Call for Sites consultations, for redevelopment to provide residential uses and/or healthcare provision. The site was taken forward as an emerging site allocation within the Local Plan Main Issues and Preferred Approaches version in 2021, with an indicative capacity of 40 residential dwellings and 1,373sqm town centre uses. NHSPS responded to this consultation supporting the allocation in principle. Then in 2021, NHSPS undertook positive pre-application discussions with the Council for a redevelopment scheme to provide up to 50 dwellings and 1,650sqm healthcare provision. The officers requested some amendments to the design of the scheme, but supported the principle of the development and made no comments regarding the quantum of development.</p> <p>With this context in mind, it is unclear why the indicative development capacity has been substantially amended within the Local Plan Proposed Submission document.</p> <p>Emerging Policy QD6 states that "<i>where development proposals do not accord with the indicative capacity set out in a site allocation policy, they will only be supported where it is clearly demonstrated the optimal capacity will be achieved, having regard too (A) and (B) above.</i>" Point A specifies that development proposals must use the design-led approach to optimise a site's capacity, and point B states that the optimum capacity must take into consideration the appropriate development density. Whilst the site allocation sets only an <i>indicative</i> capacity, Policy QD6 requires this specific capacity to be met, meaning the indicative capacity takes the form of a development requirement.</p>		

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							<p>Therefore, it is essential that this indicative capacity allows development on the site to come forward, and enables the NHS to deliver its health commissioning strategy.</p> <p>Emerging Policy CI1 recognises the need for public services including the NHS to transform their services and estates in order to sustain or enable the delivery of service improvements. The Jenner Health Centre site allocation includes a development requirement for the “<i>appropriate reprovision of the existing health care facility, in line with Policy CI1.</i>” NHSPS support emerging Policy CI1 and reference to this policy within the site allocation. However, through setting a required indicative capacity for health reprovision, this allocation restricts the ability of the NHS to deliver its public service transformation plan, and is therefore in conflict with policy CI1.</p> <p>As discussed above, NHSPS works with NHS commissioners to ensure that the necessary services are provided in the best possible locations. NHSPS appreciate the Council’s intent to secure health provision for local residents. However, by confining the form of this provision, the allocation removes the flexibility needed by the NHS to implement its strategy and meet the needs of the community.</p> <p>To confirm, sites (or sections of a site) can only be released for redevelopment or alternative uses once NHS commissioners have confirmed that it is no longer required for the delivery of NHS services. Additionally, all capital receipts raised from the disposal of sites are invested back into the NHS, enable further improvements to local health infrastructure.</p> <p>Considering the above, NHSPS suggest the Jenner Health Centre Site Allocation 3 be amended to enable the NHS to reflect the site’s capacity as demonstrated through our previous pre-application discussions. This amendment also brings the site allocation in line with emerging Policy CI1, and enables the NHS to deliver its public service transformation programme and improve local health services.</p> <p>Image of site allocation Amended Wording The following amended wording (in blue) is recommended:</p> <table><tr><td>INDICATIVE DEVELOPMENT CAPACITY:</td><td>Net residential units 30-50</td><td>Gross non-residential floorspace Employment 0 Main town centre uses 2,084 in line with local health commissioners estate strategy</td></tr></table> <p>Policy (health considerations in policy/design)</p>	INDICATIVE DEVELOPMENT CAPACITY:	Net residential units 30-50	Gross non-residential floorspace Employment 0 Main town centre uses 2,084 in line with local health commissioners estate strategy		
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							<p>Policies QD1, QD2, QD3, and QD8 provides requirements and guidance to ensure that the design of homes and public spaces is healthy and inclusive. NHSPS supports these policies.</p> <p>Context There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure, enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health. The NPPF is clear in stating that “Planning policies and decisions should aim to achieve healthy, inclusive and safe places” (Paragraph 92).</p> <p>Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities.</p> <p>Summary NHSPS thank Lewisham Council for the opportunity to comment on the Proposed Submission Local Plan and hope the proposed amendments are considered constructive and helpful. We look forward to reviewing future iterations of the plan and receiving confirmation that these representations have been received. Should you have any queries or require any further information on the enclosed, please don’t hesitate to contact me.</p>		
CON065	REP340	NHS Property Services Ltd			2	CI1	<p>Policy flexibility (enabling the NHS to be able to promptly evolve its estate) Introduction</p> <p>Policy CI1 Safeguarding and Securing Community Infrastructure states that development proposals will be permitted where “the development is directly associated with a public service transformation programme necessary to enable or sustain the delivery of service improvements and related investment in community infrastructure.”</p> <p>NHSPS support this policy wording, subject to confirmation that this would include any relevant NHS Estate Strategy, where any restrictions or requirements for periods of marketing could prevent or delay investment in new/improved health infrastructure.</p>	The Council notes and welcomes the broad level of support offered in relation to the new Local Plan Policy CI1 Safeguarding and securing community infrastructure. The Council welcomes the wider support provided by infrastructure partners, such as those in the public healthcare sector, for the new Local Plan. The Council remains committed to working with all its infrastructure partners, both internal and external, to secure the necessary improvements to networks required to support the planned-for growth set out in the new Local Plan.	No further action required in relation to the new Local Plan.
CON066	REP341	Kitewood Estates			3	LWA SA 09	<p>RE: Local Plan Regulation 19 Consultation Kitewood Estates Limited (‘Kitewood’) write to provide our comments relating to:</p>	The Council notes the comments made in relation to the new Local Plan Policy LWA	No further action required in relation to the new Local Plan.

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							<ul style="list-style-type: none"> <i>Lewisham Local Plan: Proposed Submission Document January 2023</i>; and <i>Proposed Policies Map and Schedule of Proposed Changes to the Adopted Policies Map December 2022</i> <p>Kitewood is a privately owned development company, and we specialise in delivering high quality developments in London and the South East of England.</p> <p>We control land adjacent to Willow Way, Sydenham and our comments predominantly relate to this site and the wider proposed allocation and masterplan area, edged by a broken blue line on Fig 1.1 below.</p> <p>Fig 1.1 Location of proposed LSIS (Emerging Site Allocation No. 9)</p>  <p>The land adjacent to Willow Way is proposed to be allocated as a Locally Significant Industrial Site (LSIS) for an employment-led mixed-use development in the emerging Local Plan.</p> <p>The area that is proposed for allocation comprises multiple ownerships / land control. For reference purposes, the sites are distinguished by referring to; Site A; Site B; Site C; Site D; and Site E on Fig 1.1.</p>	<p>SA 09 Willow Way Locally Significant Industrial Site (LSIS).</p> <p>For clarity, it is highlighted that the site allocation is an existing and operational Locally Significant Industrial Site (LSIS), which includes active industrial employment uses. The policy is seeking the redevelopment and intensification of the site, along with the co-location of commercial and other uses, to secure more optimal use of land, and enable the delivery of new and improved workspace to support the long-term viability of the LSIS.</p> <p>For further clarity, the wording and content of new Local Plan Policy LWA SA 09 Willow Way Locally Significant Industrial Site (LSIS) was informed through the Regulation 18 process, when comments were submitted by Selkent Holdings (Daniel Watney LLP) a private landowner within the Borough, owning the site known as 12-24 Willow Way, SE26. Consequently, the Willow Way LSIS site allocation was amended in relation to master planning for sites with multiple ownerships and to provide clarity in relation to net loss of industrial capacity.</p> <p>The comment that the new Local Plan's approach towards site capacities, building heights and site optimisation is noted.</p> <p>The Council highlights that the new Local Plan must be read and considered in its entirety.</p> <p>The development of site allocations must be considered within the context of relevant planning policies. This includes those set out under Chapter 5 High Quality Design. Specifically, Policies QD 1 Delivering high quality design in Lewisham, QD 4 Building Heights and QD 6 Optimising site capacity merit consideration in relation to this matter. The Council considers that</p>	<p>The Council will contact the site allocation promoter with the objective of securing a signed SoCG that identifies matters of agreement between the parties and a delivery trajectory.</p>

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							<table><tr><td>Emerging Willow Way LSIS</td><td>Ownership/ land control</td></tr><tr><td>Site A</td><td>Kitewood Estates Limited</td></tr><tr><td>Site B</td><td>LB Lewisham</td></tr><tr><td>Site C</td><td>Kitewood Estates Limited</td></tr><tr><td>Site D</td><td>Private Individual</td></tr><tr><td>Site E</td><td>Private Individual(s)</td></tr></table> <p>Kitewood submitted a full planning application to the Council in December 2022 (application Ref: DC/22/129789) relating to Site A (21-57 Willow Way) for 1,401sqm flexible employment floorspace and 60 homes (including 50% Affordable Homes) in the context of an emerging masterplan. This planning application was refused by the Council on 23 March 2023.</p> <p>Whilst we have not been directly approached by the Council to provide comment on the proposed emerging allocation LSIS at Willow Way, we have significant experience in delivering sites of this nature and we welcome the opportunity to comment on the emerging Local Plan (Regulation 19) to ensure the emerging site-specific policy “...is aspirational but deliverable” as set out in Para 16 of the NPPF.</p> <p>We understand that this Submission Draft Local Plan consultation requires representations to specifically focus on the following issues:</p> <ul style="list-style-type: none">• Is the plan legally compliant? - Does the Plan comply with the relevant legislation and regulations in the way it has been prepared, and in its content?• Does the plan comply with the ‘Duty to Cooperate’? - Has the local planning authority engaged constructively, actively and on an ongoing basis with neighbouring authorities and other prescribed bodies during the preparation of the Plan?• Is the plan ‘sound’? - Has the Plan been ‘positively prepared’? Is it robustly justified and evidence-led? Will it be effective in what it sets out to achieve? Is it consistent with regional and national planning policy? <p>Lewisham Local Plan: Proposed Submission Document January 2023</p> <p>This letter will focus on matters relating to soundness. Para 35 of the NPPF States that Plans are ‘Sound’ if they meet the following tests of soundness: “a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p>	Emerging Willow Way LSIS	Ownership/ land control	Site A	Kitewood Estates Limited	Site B	LB Lewisham	Site C	Kitewood Estates Limited	Site D	Private Individual	Site E	Private Individual(s)	<p>these relevant planning policies provide a sound approach for decision-taking. They provide development partners with an opportunity to propose and justify proposals that through master planning and/ design-led approaches offer optimal development capacities.</p> <p>The new Local Plan Policy QD 4 Building Heights has been prepared in partnership with the Greater London Authority – a key strategic plan-making partner. It is consistent and conformity with the London Plan Policy D9 Tall Buildings, which requires that local plans – “...<i>identify locations where tall buildings may be an appropriate form of development...</i>” and “...<i>in these locations, determine the maximum height that could be acceptable.</i>” (London Plan Policy D9 Tall Buildings Paragraph 3.9.2).</p> <p>The Council considers that the new Local Plan’s master planning and/ or design-led approach to site allocation delivery provides a sound basis for decision-taking. Furthermore, it provides development partners with an opportunity to secure good quality design and successful place-making that optimises the opportunities provided by their sites.</p> <p>It is noted that the development partner has prepared a master plan for the site, which has been submitted to the development management process. The Council maintains that this is an appropriate and effective approach for bringing individual land interests together to enable landowners to reach agreement on their shared objectives. In contrast, the respondent’s proposal to remove their land interests from the site allocation is unsound.</p> <p>For clarity, the Greater London Authority sets out its policy approach for Locally</p>	
Emerging Willow Way LSIS	Ownership/ land control																				
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Site E	Private Individual(s)																				

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							<p><i>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</i></p> <p><i>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</i></p> <p><i>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”</i></p> <p>Kitewood’s comments relate to principally to the following matters; Justified and Effective.</p> <p>Justified Principle of Development for LSIS Kitewood consider that the proposed allocation of Willow Way as an LSIS is unjustified. The redevelopment opportunity at Willow Way to make the best use of Previously Developed Land (PDL) to deliver a viable mixed use scheme exists.</p> <p>However, the sites adjacent to Willow Way that make up the emerging allocation area are predominantly in employment uses in accordance with the adopted Local Employment Location (LEL); the sites are not predominantly Industrial. The predominant surrounding uses are residential and the employment sites themselves were previously occupied by residential dwellings.</p> <p>Kitewood consider that the Policy for Willow Way should seek an employment led mixed use development, not an LSIS mixed-use development.</p> <p>The Local Plan evidence base, namely, the Employment Land Study 2019 (ELS) supports this.</p> <p>Willow Way (stated as 1.2ha) Local Employment Location (LEL) is identified as cluster No.C20 in the ELS. It sets out that the primary type of employment is mixed B uses and the recommendation is for employment-led mixed-use redevelopment (through a masterplan process) (our emphasis added). The text relating to the site at para 5.52 and para 5.53 of the document is set out as follows: <i>“5.52 Willow Way (C20) – is an industrial area in Forest Hill with a mix of B class occupiers. Commercial units are located on either side of Willow Way which runs between Kirkdale and Dartmouth Road. The site benefits from being in close</i></p>	<p>Significant Industrial Sites under London Plan Policy E6. It states that</p> <p><i>“boroughs should:...make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs and distinguish these from local employment areas that can accommodate a wider range of business uses.”</i></p> <p>In response the new Local Plan Policy EC 6 states that -</p> <p><i>“LSIS will be protected for Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and related Sui Generis uses, with priority being given to office and light industrial uses.”</i></p> <p>Contrary to submitted comments the Council considers that the Willow Way site is and will remain appropriate and suitable for such uses across the plan period. It is highlighted that the suburban nature of parts of the Borough means that many of the designated employment locations are either imbedded within or in proximity to residential places. The new Local Plan anticipates this, and its planning policies make suitable provision for decision-taking.</p> <p>The comments made in relation to demand for industrial floorspace are noted. The Council considers that there is demand for the types of employment encouraged through Policy EC 6. It is noted that the respondent has not robustly demonstrated otherwise.</p> <p>The Council acknowledges that part of the site allocation was subject to a recent planning application - DC/22/129789. This was refused for a variety of reasons. It is highlighted that the Officer’s report and decision concluded –</p>	

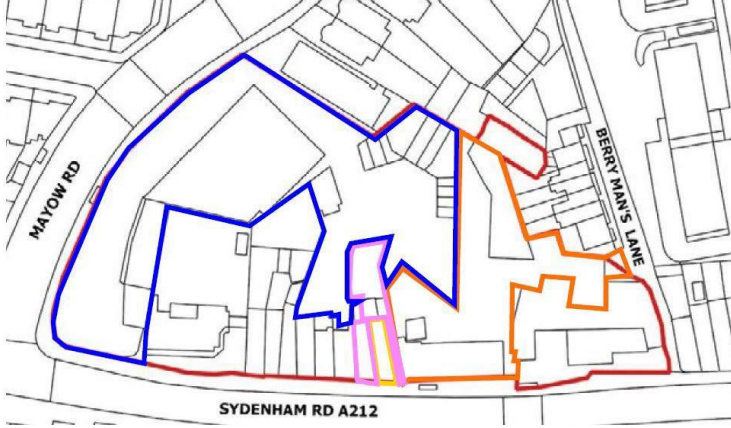
Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							<p><i>proximity to amenities; located less than 100m from the majority of the site. The site has been developed in a number of phases on a piecemeal basis. There are modern small industrial units in close proximity to Kirkdale Road which are in reasonable condition and appear to be well occupied. Further south west along Willow Way the office and small industrial units are more dated but still well occupied.</i></p> <p><i>5.53 There is vacant land in the centre of the site that was previously occupied by the council. The land is still in the council's ownership and a masterplanning exercise was undertaken in 2013/14 which produced plans to provide residential units along with a school, commercial, and mixed-use space. These should be considered positively, if they do not reduce employment floorspace, but intensify the existing offering. Currently, there is no planning application for this land but if these plans go ahead it may encourage intensification of other parts of the site. Though there may be scope to provide a mix of uses on the site. The existing amount of employment floorspace should be protected to ensure that demand in the area is met over the plan period.</i></p> <p>Furthermore, in terms of 'Layout, parking, servicing, landscaping etc.' the site scores 'Reasonable'; "Reasonable amount of yard space at Willow Business Centre given the type of units. The industrial units at the centre of the site have varying amounts of parking space and as a result, there are significant numbers of cars parked along Willow Way. Willow Way is not suitable for large HGVs, but this does not appear to be an issue for most current occupiers. There is no landscaping on the site."</p> <p>Table A2.1 at page 132 of the ELS indicates the Employment Profile of the site generates 80 Jobs (66 jobs per ha). Of the 80 jobs, they are broken down in the ELS as follows: 14% industrial; 72% office; 0% Public; and 15% Customer.</p> <p>The ELS, sets out very clearly that only 14% of the existing jobs are industrial. The ELS does not specify if these uses are light or heavy industrial uses, however Kitewood consider them to be light industrial uses.</p> <p>Kitewood consider that industrial uses in this location are not appropriate, nor in demand in this location and this is reflected by the existing composition of employment uses and along Willow Way and in the surrounding area, as outlined in the ELS above.</p>	<p><i>"...the proposal would result in a loss of industrial capacity on the site which would be a departure from the adopted local plan and no exceptional circumstances are demonstrated to show that this would be compliant with the direction of the draft Local Plan. "(Reason for Refusal 1) ; and</i></p> <p><i>"The proposed employment and marketing strategy and employment space design is unacceptable. The proposals would result in the closing of existing businesses on site with no justification/ relocation package proposals and there is insufficient detail on whom future occupants might be and how the space, servicing and fit out requirements will attract a range of businesses. Combined with this there is a lack of detail to show that the site itself can be adequately serviced or that the wider masterplan area won't be impacted by the proposed servicing arrangements, this could impact the quality and uptake of employment spaces and undermine the continued function of the employment location." (Reason for Refusal 3).</i></p>	

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							<p>The ELS recognises that the site is sustainability located and benefits from being in close proximity to local amenities. The benefits of the sustainable location and low visibility of the site from the surrounding street makes Willow Way a key opportunity site for a comprehensive mixed-use redevelopment comprising:</p> <p>a) Improved employment (use Class E) floorspace on the ground floor level: <i>The provision of flexible and creative commercial floorspace proposed is considered to be appropriate to generate quality employment opportunities and higher job yield; and is important in the context of providing active ground floor uses to animate the public realm.</i></p> <p>b) Delivery of homes to meet growing needs: <i>the provision of a full range and mix of quality housing is considered to be appropriate in this predominantly residential location.</i></p> <p>c) Placemaking and enhanced public realm: <i>improving walking and cycling routes to public transport services and local facilities, a high quality and accessible public realm, landscaping (note there is no existing landscaping), biodiversity, the provision of amenity and public open space, and children's play areas, and high quality architecture and design that will contribute to raising the architectural quality of the area.</i></p> <p>Quantum of Development Kitewood are not aware of any massing studies that have been undertaken to inform the emerging allocation and specifically, the proposed quantum of employment and residential floor areas.</p> <p>However, as it has been recognised, the emerging allocation site is hidden from the surrounding roads and the site topography would allow for an intensified proposal with greater height and mass than the existing development without creating any detrimental visual impact on the surrounding streets.</p> <p>Notwithstanding the fact that industrial uses are not considered appropriate in this location, Kitewood are not aware of any evidence that has been published that sets out how the quantum of employment of floorspace could be accommodated. Kitewood consider that the types of uses would likely only be considered appropriate and deliverable at ground floor level with ancillary mezzanine space above. Therefore, the potential maximum quantum of employment floorspace would be limited to the extent of the developable ground floor area with ancillary mezzanine space above.</p>		

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							<p>Kitewood has tested the scenario where the emerging allocation area is built out in accordance with a masterplan approach, and specifically where the employment floorspace is situated at ground floor level, with limited ancillary mezzanine above. We consider that this form of development would deliver more than the existing level of employment floorspace, whilst also meeting the allocation target of 6,705sqm. This includes retaining the existing quantum of floorspace on Site E. This approach therefore complies with London Plan Policy E2.</p> <p>Kitewood therefore do not consider that the quantum of development as set out in the emerging allocation is justified, specifically in relation to the employment areas that would reasonably be expected at ground floor only, unless the Council can demonstrate that it has considered an outline massing and layout study of the emerging allocation area, or the existing levels of employment floorspace could contribute towards meeting the allocation aspirations.</p> <p>Effective Emerging boundary for LSIS and Masterplan Area and Deliverability Kitewood support the mixed-use allocation that seeks the delivery of an employment-led development (6,705sqm) that would be co-located with 175 new homes, but it is not clear as to how the Council arrived at the proposed allocation boundary. Through an assessment of the opportunities and constraints, Sites A, B and C have the greatest potential to deliver the policy aspirations; It appears that Site D can accommodate a modest uplift of development; and Site E is already maximised and has limited potential to accommodate further development as part of a masterplan redevelopment.</p> <p>Kitewood therefore do not consider that the emerging policy boundary is effective, and it should be revised to exclude sites D and E from the emerging masterplan area unless the Council can demonstrate that it has liaised with the landowners of these respective sites and know they are available for redevelopment within the plan period, and therefore deliver the deliver the aspirations of the policy to maximise employment provision together with residential.</p> <p>Furthermore, Kitewood consider that Sites A, B and C can be delivered within 1-5 Years, not 6-10 years as set out in the consultation document. This should be updated in the Plan to ensure that delivery is not unduly delayed.</p>		


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							<p>Should the boundary of the emerging allocation remain unchanged, it is considered that the Emerging Willow Way LSIS can come forward in phases that could be delivered individually or simultaneously without prejudice to the other sites coming forward for development.</p> <table><tr><td>Development Phase</td><td>Site</td></tr><tr><td>Phase 1</td><td>Site A</td></tr><tr><td>Phase 2</td><td>Site B and Site C</td></tr><tr><td>Phase 3</td><td>Site D [and Site E]</td></tr></table> <p>Site A is physically separated from Sites B and C by Willow Way, and it therefore considered to be well located to deliver the first phase of development.</p> <p>The proposals for Site A seek to maximise the employment floorspace on the ground floor levels as would reasonably be expected in this location, whilst delivering homes above. Sites B and C also have the potential to maximise the employment floorspace on the ground floor and homes above along with potential to improve the public realm.</p> <p>Quality of Employment Floorspace Kitewood consider the quality of the existing employment floorspace across the emerging allocation areas, except for Site E, to be sub-optimal. This is reflected in the increased rate of vacancies within some of the units, as well as the quality of the existing buildings and floorspace.</p> <p>Policy EC2 of the emerging Local Plan (Protecting employment land and delivering new workspace) supports the delivery of new and enhanced workspace. Kitewood consider that an appropriate employment-led mixed use development would create an ideal opportunity to deliver much improved, upgraded and more efficient workspace, in line with Policy EC2.</p>	Development Phase	Site	Phase 1	Site A	Phase 2	Site B and Site C	Phase 3	Site D [and Site E]		
Development Phase	Site																
Phase 1	Site A																
Phase 2	Site B and Site C																
Phase 3	Site D [and Site E]																
CON066	REP342	Kitewood Estates			1	OL1	<p>Growth Node and Growth Corridor</p> <p>The Proposed Policies Map and Schedule of Proposed Changes to the Adopted Policies Map December 2022 identify the emerging allocation area within a ‘Growth Node’ and adjacent to a ‘Growth Corridor’ that runs along Kirkdale to the west, and Dartmouth Road to the north.</p> <p>Kitewood support the aspiration of the Growth Nodes and Growth Corridors as areas that are prioritised to deliver redevelopment of previously developed land to ensure green and open spaces are protected within the Borough.</p> <p>Kitewood also recognise the role that Willow Way has in connecting the Growth Corridors along Kirkdale and</p>	The Council notes and welcomes the support offered in relation to the new Local Plan Policy OL 1 Delivering an Open Lewisham (spatial strategy) – specifically their support for the identified Growth Nodes and Corridors.	No further action required in relation to the new Local Plan.								

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							Dartmouth Road and therefore consider the delivery of high-quality employment led redevelopment, with residential above is even more critical to meet the objectives of the Spatial Strategy.		
CON067	REP343	DWD OBO SG Smith Properties Limited			3	LWA SA 12	<p>RE: DRAFT LOCAL PLAN PROPOSED SUBMISSION REGULATION 19 CONSULTATION</p> <p>DWD has been instructed to submit representations on behalf of SG Smith Properties Limited ('SGS') to the Lewisham Draft Local Plan Proposed Submission Regulation 19 Consultation Document (January 2023).</p> <p>The submission comprises of this letter which has been emailed to localplan@lewisham.gov.uk. Our representations focus on draft 'Site Allocation 12: 113-157 Sydenham Road' (Site Allocation 12). Our client is the freehold owner of the following sites, which all form part of draft Site Allocation 12:</p> <ul style="list-style-type: none"> • 140-149 Mayow Road, London, SE26 4HZ • 135 Sydenham Road, London SE26 5HB • 137 Sydenham Road, London SE26 5HB • 139- 151 Sydenham Road, London SE26 5HB <p>This letter sets out:</p> <ul style="list-style-type: none"> • Confirms SGS's ownership of land forming part of Site Allocation 12; • Detail's SGS's support for the allocation and it's deliverability; and • Proposed amendments to the draft Site Allocation 12 policy wording. <p>SGS Ownership Site Allocation 12 is titled as '113-157 Sydenham Road', however the land also encompasses 140-149 Mayow Road.</p> <p>SGS own the majority of land within the proposed site allocation. Figure 1 below overlays the land area in our client's ownership over the Site Allocation 12 site plan. Our client owns 140-149 Mayow Road (blue outline), 135 Sydenham Road (pink outline), 137 Sydenham Road (yellow outline) and 139- 151 Sydenham Road (orange outline).</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy LWA SA 12 113-157 Sydenham Road.</p> <p>The following comments are noted, and a response proposed –</p> <p>Site Area The Council notes the comment that the site boundary as drawn includes an existing occupied residential building that the respondent considers is unlikely to come forward for redevelopment during the plan period. The Council will assess the accuracy of this statement and respond accordingly.</p> <p>Land Ownership/ Delivery The Council notes the well-made comment that the site is in multiple landownerships, a fact that should be recognised by the policy. Subject to it being necessary to ensure soundness the Council will consider additions to the policy.</p> <p>Dolphin Public House The comments raised in relation to the Dolphin Public House, which is a local listed building, are noted. The new Local Plan Policy HE3 addresses non-designated heritage assets. The Council considers to be a sound approach – that is positively prepared, justified, effective and in accordance with national policy.</p> <p>The addition of text that explicitly requires a master planning and design-led approach to the comprehensive development will provide development with the opportunity to assess optimal use of the site in detail. The Council considers that this will give development partners with the flexibility that they seek.</p>	<p>The Council will contact the site allocation promoter with the objective of securing a signed SoCG that identifies matters of agreement between the parties and a delivery trajectory.</p> <p>Site Area The Council will reassess the site boundary and determine whether the building identified by the respondent should be included within the extent of the site allocation. Subject to an amendment being necessary to ensure soundness, the Council can seek to introduce changes to the boundary through the modifications process.</p> <p>Land Ownership/ Delivery The Council to consider additions to the policy supporting text to highlight the need to apply a masterplanning approach towards the delivery of the site allocation at Paragraph 16.63 as follows:</p> <p><i>"6. Landowners must work in partnership and in accordance with a masterplan, to ensure the appropriate co-location, phasing and balance of employment and other uses across the site, in line with Policy DM3 (Masterplans and comprehensive development)".</i></p>

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							 <p>Figure 1: Ownership Plan The remaining ownership plots outside of SGS's ownership are: 121, 123, 123- 125, 129, 131 and 133 Sydenham Road, 153-161 Sydenham Road and a small parcel off of Berrymans Lane. These properties comprise of the Dolphin Public House, small retail units fronting Sydenham Road, an MOT repair centre/ car wash and an existing two storey building in residential use, forming part of the Crown Court development off of Berrymans Lane.</p> <p>Position on Allocation and Deliverability The land that forms part of Site Allocation 12 is already allocated within the adopted Local Plan under allocation SA22. SGS confirm that they are supportive of this allocation being carried through to the new Local Plan.</p> <p>Regarding deliverability, our client currently leases the commercial and retail properties to four tenants. There are four leases currently in place and these leases expire between April 2025 and January 2032. The residential flats at the upper two floors of 139- 151 Sydenham Road are held on assured shorthold tenancies. Vacant possession of all of the land in our client's ownership can therefore be secured.</p> <p>The draft Local Plan proposes that this land is delivered in 11- 15 years. Given the end dates of the current leases, it is considered that the timeframes set out for delivery in the draft Local Plan are realistic and achievable. It is our client's intention to promote development coming forward on their land.</p> <p>Amendments to Site Allocation 12 Policy Whilst the principle of Site Allocation 12 is supported, we have set out below suggested amendments to the policy wording that are considered appropriate.</p>	Securing quality design and place is a fundamental requirement of sustainable development.	

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							<p>Site Area A small parcel of land off of Berrymans Lane is proposed to be included in the allocation. There is a two-storey building on this land, which is in residential use. It forms part of the Crown Court development, which comprises of two blocks and a total 10 flats and off-street parking. The appropriateness of including this parcel of land within the allocation as this forms part of an existing residential development is questioned.</p> <p>Multiple Applications In the ‘development guidelines’ section of the policy, the wording should recognise that development is likely to come forward under a number of separate planning applications, given that there are multiple land owners.</p> <p>It is acknowledged that each application that comes forward will need to consider the delivery of the wider allocated site and ensure development of part of the site does not compromise the delivery of the remaining land. However, it is considered necessary to support the land being delivered by more than one planning application, to ensure that when land becomes available for development it can be delivered without delay.</p> <p>Dolphin Public House We consider that the draft policy wording relating to the Dolphin Public House should be reconsidered. SGS acknowledge that the public house is locally listed, however the policy wording needs to ensure an appropriate balance between protecting the locally listed pub and ensuring this does not unreasonably constrain development on the allocated site is needed.</p> <p>The draft wording states that development needs to conserve and enhance ‘attractive views of the west-facing gable end of the pub’. The design of the plot on the corner of Mayow Road and Sydenham Road, to the west of the pub, will need to be carefully considered. However, it needs to be ensured that the development potential of this key corner plot, which is likely to be a focal building within the allocated site due to its position, is not unreasonably constrained so as to prejudice the optimum development capacity of the allocated site being delivered.</p> <p>Furthermore the policy advises that the pub-garden should be protected from any development. The relationship between this garden, and the new build development that will come</p>		

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							<p>forward needs to be considered, to ensure the development of the wider site is not prejudiced and that a balanced approach is taken to the protection the pub-garden.</p> <p>It is considered that the policy wording should be amended to confirm that the relationship between the locally listed building and new build development will need to be considered on balance with the wider regeneration benefits of any scheme that comes forward for development of the allocated site.</p> <p>Summary SGS is the majority landowner of Site Allocation 12 of the Draft Local Proposed Submission. They are supportive of the allocation of this land in the new Local Plan and consider the proposed delivery timeframes to be realistic.</p> <p>SGS do however have concerns regarding the current draft policy wording. Specifically, there being a need to allow multiple applications to come forward, and there being a recognition of the need to balance impacts on the locally listed Dolphin Public House alongside the wider regeneration benefits of the redevelopment of the allocated site.</p> <p>We would welcome the opportunity to further engage with the Council's Spatial Planning Team to input into the final drafting of Site Allocation 12, to ensure that the allocation is effective, deliverable and justified.</p> <p>If you require any further information in connection with these representations and the proposals for the site, please do not hesitate to contact me.</p>		
CON068	REP344	Michael Sparks Associates OBO SEGRO PLC			3	LNA 3 Deptford Trading Estate	<p>1 Introduction & Site Context</p> <p>1.1 This document includes representations to the Regulation 19 version of the draft Lewisham Local Plan (the Draft Plan) that was published for consultation on the 1st March 2023. These representations have been prepared on behalf of SEGRO PLC, who are the owners of an existing employment site at Blackhorse Road in Deptford, that makes up a significant part of the land referred to as the Deptford Trading Estate in the Draft Plan.</p> <p>1.2 This document provides comments on several of the draft policies included in the Draft Plan with particular regard to their likely impact on bringing forward employment development within the Borough over next plan period. Both the National Planning Policy Framework (NPPF) and the</p>	<p>The Council notes Michael Sparks Associates' introductory comments, site context and background to SEGRO PLC and their reasoning for commenting on the policies in the new Local Plan.</p> <p>The Council supports their aspirations to continue using the site for employment uses in the future.</p>	No further action required in relation to the new Local Plan.

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							<p>London Plan provide significant support to development that supports economic growth so it is therefore important to ensure that constraints on such development are identified to ensure that sufficient employment premises are available to meet the needs of occupiers.</p> <p>1.3 The land that is within the ownership of SEGRO PLC at the Deptford Trading Estate extends to circa 1.82 Hectares and includes a number of different unit type and sizes. The site is located on Blackhorse Road, with Evelyn Road to the east, which forms the main form of access to the site. For reference, the boundary of SEGRO's ownership is illustrated by Figure 1. The employment units at the site are in use to support a range of employment operations across Classes E (g), B2 and B8.</p> <p>1.4 The estate was built in the 1980s so there are now opportunities for re-development to upgrade the building stock and provide more modern and energy efficient premises for continued employment use.</p> <p>1.5 The site is currently allocated as a Strategic Industrial Location (SIL) in both the adopted Lewisham Local Plan and the London Plan known as Surrey Canal Road, which is one of two SIL allocations in the Borough.</p> <p>1.6 SEGRO PLC intend to retain ownership of this site so that it will continue to provide for the needs of businesses and support the economic function of Lewisham and Greater London.</p>  <p>2. Background to SEGRO plc</p> <p>2.1 For over 100 years, SEGRO has been developing and managing warehouse and industrial space to support business</p>		

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							<p>growth. SEGRO's 1,400 customers range from global organisations to small businesses, and include household names such as Royal Mail, Brompton Bikes, Mars, John Lewis, Netflix, Rolls Royce, and Mitsubishi.</p> <p>2.2 SEGRO warehouses provide the space that enable extraordinary things to happen, from pharmaceutical development to high value engineering, urban logistics to R&D, film production to food manufacturing, and data storage to e-commerce. These sectors are helping to create high value jobs for local people, drive innovation, and boost productivity by providing the goods and services that a modern society demands.</p> <p>2.3 In Greater London, SEGRO owns and manages nearly 1.4 million sqm of industrial space which is home to 450 businesses of varying sizes. This includes Deptford Trading Estate and New Cross Business Centre, in the London Borough of Lewisham.</p> <p>2.4 SEGRO occupiers at London industrial locations are varied and cover a number of different sectors that often support other uses and economic activity across the Capital and the UK. Some examples of the type and scale of businesses accommodated at SEGRO premises in the borough are set out below, which provides a snapshot of businesses that operate from employment locations:</p> <ul style="list-style-type: none"> o Food distribution, including small and medium sized enterprises (SME's) serving some of the best restaurants in the capital as well as charities that seek to avoid food waste through redistributing surplus groceries to vulnerable people; o Supply and installation of domestic goods such as bespoke carpets and flooring, many of which are smaller family run businesses o Catering business for events in prestigious London venues as well as brewers who manufacture craft beers and other beverages, o Suppliers of theatre hardware and stage equipment o Online delivery operations and couriers o Suppliers and distribution to the automotive industry 		

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							<p>o Commercial laundry services serving hospitals, hotels and other operations.</p> <p>3 Comments on Draft Policies</p> <p>3.1 This section details the policies that SEGRO PLC want to make representations on and whether they wish to offer their support or object to it. For clarity, the draft policy is set out first, followed by commentary about the policy. Finally, any proposed changes to the policy wording are identified, where this is considered necessary.</p> <p>3.2 These representations are made in consideration of paragraphs 15 to 37 of the NPPF, with particular reference to the need for policies to be consistent with National and Regional policy, to contribute to the delivery of the Plan's objectives and be clearly written and unambiguous.</p> <p>4 Summary Lewisham's Proposed Submission Local Plan contains some key policy provisions that could be potentially problematic for new employment development in the Borough, including the redevelopment of Deptford Trading Estate. Our feedback in response to these draft policies can be summarised as follows:</p>		
CON068	REP345	Michael Sparks Associates OBO SEGRO PLC			3	LNA 3 Deptford Trading Estate	<p>• Summary: Draft Policy LNA3 – The Council should review the wording of this policy to ensure that the function and effectiveness of SILs is not undermined.</p> <p>CREATIVE ENTERPRISE ZONE New Draft Policy LNA3 – Creative Enterprise Zone <i>C. The continued growth and evolution of the creative and cultural industries within the CEZ will be supported, in particular, by:</i> <i>a. Ensuring that development proposals protect existing industrial capacity and contribute to making provision for flexible workspace and facilities in suitable locations, at an appropriate range of rents. Development proposals will be considered favourably where they incorporate low-cost and an appropriate amount of affordable workspace, particularly space catered to micro, small and medium sized businesses, including start-ups and independents;</i></p> <p>Position: Object 3.33 This policy should complement and not compromise the function of Strategic Industrial Locations (SIL) to operate effectively in meeting the needs of a range of businesses. SIL form London's largest concentrations of industrial and logistical uses and play a key role in supporting the capital's</p>	<p>The Council agrees that the prime function of the Surrey Canal SIL should be to accommodate industrial and logistic uses, regardless that it is located within the CEZ, as it serves an important function not just within the local economy but across London too.</p> <p>Creative and cultural industries should not be prioritised over industrial and logistic uses, to ensure there is no detrimental impact to the functioning and continued operation of the Surrey Canal SIL.</p>	<p>The Council will consider minor modifications to ensure that creative and cultural industries within the CEZ should complement / not adversely impact on the continued operation and effectiveness of the Surrey Canal SIL for industrial and logistical use.</p>

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							<p>economy. The Council should ensure that CEZ policies to support more creative industries, do not adversely impact on the function or effectiveness of the SIL to accommodate industrial and logistical uses. After all, many of the strategic activities occurring in SILs will, directly or indirectly, service the needs of creative industries, and unlike creative industries it is often not appropriate of possible for these strategic functions to be located anywhere other than SILs.</p> <p>Proposed wording: <i>C. The continued growth and evolution of the creative and cultural industries within the CEZ will be supported, in particular, by:</i> <i>a. Ensuring that development proposals protect existing industrial capacity and contribute to making provision for flexible workspace and facilities in suitable locations, at an appropriate range of rents. Development proposals will be considered favourably where they incorporate low-cost and an appropriate amount of affordable workspace, particularly space catered to micro, small and medium sized businesses, including start-ups and independents;</i> <i>b. <u>For Strategic Industrial Locations (SIL) within the CEZ, development should not adversely impact on the function or effectiveness of the location for accommodating industrial and logistical uses serving the borough and the wider city.</u></i></p>		
CON068	REP346	Michael Sparks Associates OBO SEGRO PLC			2	QD1	<p>• Summary: Draft Policy QD1 – This policy should clarify which developments should be referred to the Design Panel or developers will face unnecessary additional costs and a lengthier planning application process.</p> <p>DESIGN Draft Policy QD1 – Delivering high quality design in Lewisham <i>J. Development proposals will be expected to have regard to and address:</i> <i>b. Feedback from the Council including through its Pre-application Advice Service and where appropriate, Lewisham’s independent Design Review Panel.</i> 3.3 Further information on the Design Review Panel is then set out in the following explanatory text, which states (para 5.7): <i>Comments from the panel are fed into the assessment of pre-application schemes, planning applications and appeals. Proposals for major developments and other developments likely to have significant local impacts should be brought to the panel at the early stage in the planning process</i></p> <p>Position: Object 3.3 Major applications for commercial development are those of 1,000 sq m or more, or where they are on sites of 1 ha or</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD1 Delivering high quality design in Lewisham and the request that only developments referable to the GLA should be subject to the DRP.</p> <p>The Council disagrees with this and sees the DRP as a beneficial and iterative part of the pre-app and application process whereby implementing a design-led process from the start can lead to a higher quality scheme. There may be schemes that fall below the threshold for referral to the GLA that could have a significant impact on Lewisham’s townscape and so considered should be given on a site-by-site basis as to whether the scheme needs to be presented to the panel.</p>	No further action required in relation to the new Local Plan.

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							<p>more. For employment development on sites that are designated as SIL, these represent very small developments. The principle of development is already established and the potential for likely impacts for development of this nature is considered to be small.</p> <p>3.4 Therefore the need to present such proposals to the Design Review Panel is considered to be excessive, placing additional demands on applicants for smaller proposals and leading to extended application timescales. The terms of reference for the Borough's Design Review Panel state that proposals for important/significant major development should be subject to review by the Panel so the explanatory notes to the policy should reflect this.</p> <p>3.5 The term 'important major' or significant major' development is open to interpretation and imprecise. Larger employment development that is referable to the GLA (i.e. on sites over 5 Ha or in excess of 15,000 sq m) are likely to have greater potential for local impacts. It is therefore considered that the explanatory notes should be amended to refer to referable major employment schemes, as this would be a defined threshold that would prevent ambiguity.</p> <p>Proposed amended wording of paragraph 5.7: <i>Comments from the panel are fed into the assessment of pre-application schemes, planning applications and appeals. Proposals for major developments that are referable to the GLA and other developments likely to have significant local impacts should be brought to the panel at the early stage in the planning process.</i></p>		
CON068	REP347	Michael Sparks Associates OBO SEGRO PLC			2	QD3	<ul style="list-style-type: none"> Summary: Draft Policy QD3 – This policy should note that public art provision will likely be a requirement for 'important major' development, not all major development. <p>Draft Policy QD3 – Public realm and connecting places <i>H. Development proposals, particularly for major development, should investigate opportunities to integrate public art to enhance the legibility of the public realm, enhance the distinctiveness of buildings and spaces, and to help to foster a sense of place. The use of local artists for public art commissions is strongly encouraged.</i></p> <p>Position: Object 3.6 This policy should be reworded so that the provision of public art is provided as a Section 106 obligation, where appropriate.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD3 Public realm and connecting places.</p> <p>For clarity, the matter of developer contributions/ planning obligations, such as those that will be sought to secure on-site public art provision, are addressed through Policy DM2 Infrastructure funding, and planning obligations. The Council considers that this approach already responds to the respondent's request and that consequently the Plan is sound.</p>	No further action required in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							Proposed wording: <i>H. For important major developments, public art to enhance the legibility of the public realm, enhance the distinctiveness of buildings and spaces, and to help to foster a sense of place. The use of local artists for public art commissions is strongly encouraged.</i>		
CON068	REP348	Michael Sparks Associates OBO SEGRO PLC			2	EC3	<p>• Summary: Draft Policy EC3 – This policy sets a low floorspace threshold for the provision of smaller employment units and is potentially problematic for SMEs looking for floorspace of c. 2,500 sqm.</p> <p>ECONOMY Draft Policy EC3 - High quality employment areas and workspace <i>A. Development proposals must:</i> <i>b. Make provision for an appropriate level of internal fit out beyond shell and core, including:</i> <i>i. Connection-ready high speed broadband;</i> <i>ii. Installation of mechanical and electrical services;</i> <i>iii. Toilets and kitchenette;</i> <i>iv. Internal surface finishing and blinds;</i> <i>v. Basic fire and carbon monoxide detection; and</i> <i>vi. Shopfronts and glazing, where appropriate.</i> <i>B. Development proposals for new Class E(g), B2, B8 and similar Sui Generis uses over 2,500 square metres (gross external area) must include a reasonable proportion of flexible workspace or smaller units suitable for micro, small and medium sized enterprises (SMES).</i></p> <p>Position: Object</p> <p>3.7 Part A (b) of draft policy EC3 is too specific, as details concerning the internal appearance and specification of internal fittings of new employment unit will only be selected by occupiers once approval is granted and often after development of the shell and core has completed. Any provision of such internal fittings and finishes could end up being redundant as it may not meet the occupier’s requirements and be stripped out so that they can undertake their own fit out, which would be a waste of resources. The policy should therefore be reworded to at least remove clause iv.</p> <p>3.8 In the adopted plan, SMEs are encouraged to locate in LEL locations, which are now discouraging larger scale development, and evidently defining the role and nature of both LELs and SILs. Under the new policy, the roles of areas of SIL, LSIS and MEL are less clearly defined leading to confusion</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 03 High quality employment areas and workspace.</p> <p>The specific comments made in relation to the development requirements set out under Policy EC 03 A and the suggestion that these are too prescriptive are noted and discounted. The Council maintains that the policy is effective and reasonable.</p> <p>For clarity, the policy speaks to making provision and providing flexibility. For further clarity Paragraph 8.18 states –</p> <p><i>“Proposals limited to 'core' and 'shell' only specifications are not considered appropriate and will be strongly resisted. This requirement is necessary to ensure the attractiveness and marketability of units, particularly in promoting early take up of workspace and helping to prevent long-term vacancies. It is also vital to supporting mirco, small and independent businesses which are unlikely to be in a position to absorb the initial overhead costs for fit out. The appropriate level of fit out will be considered on a site-by-site basis.”</i></p>	No further action required in relation to the new Local Plan.

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							<p>about what type of employment operations is suitable on these sites. The purpose of areas of SIL is to provide areas that are not compromised in their ability to support the employment needs of businesses.</p> <p>3.9 In the London Plan, the equivalent Policy E2 uses less restrictive language than draft policy EC3 stating that proposals should “<i>consider the scope</i>” to provide flexible workspace for micro businesses and SMEs. Requiring development of this scale to include small/micro units could compromise the ability of development to meet market demands and make the best use of land to support economic growth, which are all key requirements of the NPPF, the London Plan and the Draft Plan.</p> <p>3.10 This policy is likely to affect the availability of smaller to medium sized employment units, as space will need to be given over to accommodate the policy requirement, thereby reducing the size of the other units within the development. SME’s are often as likely to use units of c.3,000-4,000 sq m as larger businesses, but there is no strict rule about what size units different business types will use. The draft policy is therefore likely to compromise the ability of areas of SIL to deliver the type of development that they are designated to provide.</p> <p>3.11 The wording of this draft policy should therefore be more flexible, so that it does not relate to SIL and only requires proposals to consider provision of smaller units. If the policy wording refers to 2,500 sq m, then this is a very low threshold and development of this scale would compromise the development of employment land to meet the needs of businesses of all sizes. The policy should therefore adopt a wording that is more like the London Plan.</p> <p>Proposed wording: <i>A. Development proposals must:..</i> <i>b. Make provision for an appropriate level of internal fit out beyond shell and core, where appropriate including:</i> <i>i. Connection-ready high speed broadband;</i> <i>ii. Installation of mechanical and electrical services;</i> <i>iii. Toilets and kitchenette;</i> <i>iv. Internal surface finishing and blinds;</i> <i>v. Basic fire and carbon monoxide detection; and vi. Shopfronts and glazing, where appropriate.</i> <i>B. Development proposals for new Class E(g), B2, B8 and similar Sui Generis uses over 2,500 square metres (gross</i> </p>		

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							<i>external area) outside of SILs, must consider the provision of a reasonable proportion of flexible workspace or smaller units suitable for micro, small and medium sized enterprises (SMES).</i>		
CON068	REP349	Michael Sparks Associates OBO SEGRO PLC			2	EC4	<p>• Summary: Draft Policy EC4 – The Council should provide sufficient evidence to justify affordable workspace requirements in relation to B2 and B8 uses.</p> <p>Draft Policy EC4 – Low-cost and affordable workspace <i>D. New major commercial development proposals for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and similar Sui Generis uses must make provision for affordable workspace. Developments must provide at least 10per cent of the rentable floorspace (Net Internal Area) as affordable workspace at 50 per cent of market rents. Affordable workspace should be provided on-site. Off-site provision will only be acceptable where it is demonstrated to the satisfaction of the Council that on-site provision is not feasible or off-site provision will achieve greater economic benefits. Off-site provision will be secured through planning obligations. Payment in lieu contributions will be used to support the provision of affordable workspace in Lewisham.</i></p> <p>Position: Object</p> <p>3.12 In the adopted Local Plan, the Council only require low-cost workspace of developments in Local Employment Allocations but they have now extended this requirement to all new major development proposals.</p> <p>3.13 Policy E3 of the London Plan states that Local Plans “should consider detailed affordable workspace policies in light of local evidence of need and viability”.</p> <p>3.14 In formulating draft policy EC4, the Planning Authority have not provided sufficient evidence that the requirement for providing 10% of rentable floorspace at 50% of market rate would be feasible for developers of industrial and warehouse proposals.</p> <p>3.15 The draft policy is informed by Lewisham’s Local Plan Viability Assessment (2022), but this document states that the key findings for testing the viability of affordable workspace are based on Class B1 (now E(g)) uses. The testing excluded use Classes B2 and B8, which would be the predominant forms of development that will come forward at the Deptford Trading Estate site. The evidence for the viability of these</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 04 Low-Cost and Affordable Workspace. Specifically, the Council notes that the respondent believes that further evidence be presented to justify the requirement that proposals for new B2 and B8 uses secure new affordable workspace provision.</p> <p>The provision of affordable employment floorspace and premises continues to be a critical component of the Council’s strategy for growth and place-shaping across the Borough. The Council remains committed to working with development partners to achieve this important objective.</p> <p>The technical evidence supporting the new Local Plan demonstrates that the demand/ need for affordable workspace provision will continue throughout the plan period. For clarity, Paragraph 8.22 states –</p> <p><i>“Lewisham’s Employment Land Study (2019) and Local Economic Assessment (2019) identify rising commercial sales and rental rates and the lack of low-cost and affordable workspace as an important issue in the Borough. The cost and availability of workspace can create a barrier to entry in the local economy and wider community, posing challenges for businesses and groups seeking to locate to, start-up or expand in Lewisham. This is particularly for micro, small and independent businesses as well as social enterprises, charities and voluntary organisations. The Local Plan therefore seeks to ensure that existing low-cost and affordable workspace is retained and that new provision is created as commercial development comes forward.”</i></p>	No further action required in relation to the new Local Plan.

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							<p>thresholds is therefore considered to be insufficient and the draft policy would not be sound.</p> <p>3.16 In addition to the policy not being demonstrably viable for warehouse developments, it is also not practical or deliverable. Given the lack of SIL land in the borough, a typical warehouse development in Lewisham is likely to be major by planning definition, but relatively small scale in terms of the number of business units it delivers. For example, a development of 2,500 sqm in SIL might only deliver one or two units, and yet would attract a requirement for 250 sqm to be affordable. Regardless of viability there would be no way of carving up the unit and associated yard space to achieve this. It also wouldn't deliver the type and scale of space needed to meet the 'strategic' function of SIL, further eroding the borough's contribution to meeting strategic industrial needs following years of release to housing and other uses.</p> <p>3.17 The current wording would compromise the delivery of new employment development on areas classified as SIL and the draft policy should be amended to provide greater flexibility and not be prescriptive about the exact level of affordable workspace required as this has not been tested robustly as part of the Council's Evidence Base.</p> <p>Proposed wording: <i>D. Outside of SILs new major commercial development proposals for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and similar Sui Generis uses should consider the provision of affordable workspace where this is viable. Developments must provide at least 10per cent of the rentable floorspace (Net Internal Area) as affordable workspace at 50 per cent of market rents. Affordable workspace should be provided on-site. Where Off-site provision will only be acceptable where it is demonstrated to the satisfaction of the Council that on-site provision is not feasible or off-site provision will achieve greater economic benefits. Off-site provision will be secured through planning obligations. Payment in lieu contributions will be used to support the provision of affordable workspace in Lewisham.</i></p>	<p>The above position is supported through the Regulation 19 consultation – with some respondents making the specific case for new affordable provision and safeguarding of existing floorspace – particularly, where it supports business start-ups and the creative industry.</p> <p>Strategic Industrial Locations The Council acknowledges that some of the Strategic Industrial Locations found in Lewisham are indeed large sites dominated by equally large single buildings, such as strategic warehouses. However, there is an equal if not greater proportion of Strategic Industrial Locations that are populated by multiple industrial uses. Typically, these are characterised by the multiple final-mile distribution points, or smaller/ start-up type businesses; the latter for example finding homes in railway arches.</p> <p>The implied statement that the provision of affordable workspace prevents the redevelopment of existing large-scale units/ sites is disputed. It is not supported by any evidence from the respondent – it is an anecdotal statement. In contrast, the Council can draw upon its own experiences and evidence as the local planning authority to demonstrate the effectiveness of this policy approach. Other evidence, including viability testing, has not raised this matter as a barrier to growth. Furthermore, the new Local Plan (considered in its entirety) provides sufficient flexibility to allow development partners and decision-takers to apply judgement where such matters can be robustly demonstrated. For these reasons, the Council considers the policy sound.</p> <p>For these reasons, the Council considers the policy sound.</p>	
CON068	REP350	Michael Sparks Associates			2	EC5	<p>Draft Policy EC5 – Strategic Industrial Locations (SIL) <i>B. Development proposals within or adjacent to SILs must not adversely impact on the function or effectiveness of the SIL to</i></p>	<p>The Council welcomes the support provided for the new Local Plan Policy EC5 Strategic Industrial Locations (SILs).</p>	No further action required in relation to the new Local Plan.

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		OBO SEGRO PLC					<p><i>accommodate commercial and industrial uses or their ability to function on a 24-hour basis.</i></p> <p>Position: Support</p> <p>3.18 It is important that the SIL locations, as a concentration of industrial and logistical uses, are protected. The reinforcement that these should be capable of operating 24/7 is supported, as SEGRO's experience dealing with industrial occupiers is that most require flexibility for operations during these hours.</p>		
CON068	REP351	Michael Sparks Associates OBO SEGRO PLC			2	GR5	<p>• Summary: Draft Policy GR5 – The Council should clarify their position on employment developments which cannot deliver a sufficient UGF score. The policy should also acknowledge the potential structural, financial, and environmental issues associated with green roofs and walls in relation to employment buildings.</p> <p>GREEN INFRASTRUCTURE Draft Policy GR5 – Urban greening and trees <i>C. Major development proposals must increase green cover on site to achieve the recommended target Urban Greening Factor (UGF) in the London Plan, unless it can be suitably demonstrated that this is not feasible. The target UGF score is 0.3 for predominantly commercial development (excluding B2 and B8 uses). Existing green cover retained on-site will count towards the target score. Planning contributions may be sought where the target UGF is not achieved.</i> <i>D. Development proposals should maximise the use of green roofs and walls. Major development proposals will be expected to demonstrate that the feasibility of integrating these measures has been fully investigated. Green roofs and walls will be supported where they are appropriately designed, installed and maintained. Development proposals should have regard to the latest industry good practice guidance to help ensure that green roofs and walls are designed to maximise environmental benefits and will function effectively over the lifetime of the development.</i> <i>E. Development proposals must seek to retain trees of quality and associated habitat, wherever possible, with appropriate arrangements to secure their protection throughout demolition, construction, and external works, to the occupation stage of development. They should also maximise opportunities for additional tree planting particularly in urbanised locations such as streets and town centres.</i></p> <p>Position: Object</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy GR 05 Urban Greening and Trees.</p> <p>The Council is committed to urban greening as a component part of place-making. Evidence demonstrates that urban greening can provide multifunctional benefits such as for climate change resilience, amenity including air quality, nature conservation and local character. It is unclear to the Council as to the reasons why development partners would be resistant to such a positive and mutually beneficial aspect of place-making.</p> <p>Employment Land Provision For clarity, the new Local Plan's approach to urban greening and trees applies to all development, with some differentiation provided between major and minor development proposals.</p> <p>Contrary to the respondent's statement, the Council challenges the position that employment sites are fundamental different from other forms of growth and cannot accommodate on-site urban greening and trees.</p> <p>For clarity, the London Plan Paragraph 8.5.5 states –</p> <p><i>“Residential development places greater demands on existing green infrastructure and, as such, a higher standard is justified. Commercial development includes a range of uses and a variety of development</i></p>	No further action required in relation to the new Local Plan.

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							<p>3.19 The London Plan notes that employment development for B2 and B8 development does not have to meet a particular Urban Greening Factor score, but it should take efforts to provide as much as possible. Employment sites need to make best use of land to intensify development where possible and requires large service yard areas to meet operational requirements for HGV manoeuvring etc. There is often little scope to achieve urban greening on site due to these operational constraints.</p> <p>3.20 The requirement to provide financial contributions where a target score is not met should therefore not apply to employment development as there are valid operational reasons, as acknowledged in the London Plan why such development cannot meet these targets and development should not be penalised for this. Draft Policy GR5 should therefore clarify whether financial obligations will be required of employment development if the proposal fails to deliver a satisfactory UGF score.</p> <p>3.21 SEGRO PLC have carried out studies into the feasibility of green roofs and found that they would not be structurally, environmentally, or financially suitable for their buildings.</p> <p>3.22 Even when the lightest types of green roof are considered, when saturated with water, they increase the typical structural load by approximately 50%. Consequently, the building would need to be reinforced using heavier steel sections and the size of the foundation pads would need to be increased, requiring more concrete. Employment units are designed to allow flexible interior spaces with as few columns as possible and using the most efficient construction method to reduce roof loadings. The addition of a green roof goes completely against these design parameters.</p> <p>3.23 Because of the need for more steel and concrete to support a green roof, it is estimated that fitting a green roof would increase the cost of constructing an industrial building by approximately 15%. There are also environmental implications to providing a green roof as the use of additional steel and concrete will increase embedded carbon in the development by approximately 10%.</p> <p>3.24 Green roofs also restrict the ability to provide solar panels and roof lights, which would otherwise help to offset the potential carbon emissions arising from the development by producing renewable energy on site. Green roofs also limit</p>	<p><i>typologies where the approach to urban greening will vary. Whilst the target score of 0.3 does not apply to B2 and B8 uses, these uses will still be expected to set out what measures they have taken to achieve urban greening on-site and quantify what their UGF score is."</i></p> <p>The new Local Plan must be read and considered in its entirety. Development partners should not consider the requirement to secure the benefits of urban greening and trees in isolation of other key components of place-making. The new Local Plan's High Quality Design Policies and masterplanning/ design-led approach to securing growth (Policy DM 03) provide developers and decision-takers with an appropriate toolchest to secure new places that are innovative, sustainable and of high-quality design. There is no demonstrable reason why new employment uses cannot share in the benefits provided through this approach.</p> <p>Financial Contributions The Council notes that the London Plan Policy G5 Urban Greening states that –</p> <p><i>"B Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses)."</i></p> <p>In summary the Council has, through the new Local Plan, prepared an Urban Greening Factor that is appropriate for Lewisham. The Greater London Authority has not challenged the Council on this approach.</p>	

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							<p>space to fit roof lights, requiring more energy for artificial lighting.</p> <p>Proposed wording: <i>Major development proposals must increase green cover on site to achieve the recommended target Urban Greening Factor (UGF) in the London Plan, unless it can be suitably demonstrated that this is not feasible. The target UGF score is 0.3 for predominantly commercial development (excluding B2 and B8 uses). Existing green cover retained on-site will count towards the target score. Planning contributions may be sought where the target is not achieved, with the exception of development for B2 and B8 uses.</i> <i>D. Development proposals should consider the use of green roofs and walls and incorporate these where feasible. Major development proposals will be expected to demonstrate that the feasibility of integrating these measures has been fully investigated. Green roofs and walls will be supported where they are appropriately designed, installed and maintained. Development proposals should have regard to the latest industry good practice guidance to help ensure that green roofs and walls are designed to maximise environmental benefits and will function effectively over the lifetime of the development.</i></p>	<p>Green Roofs The Council acknowledges that the shift to innovative and sustainable solutions that positively contribute towards climate change resilience and good quality place-making may be difficult for some development partners. It is understood that the development industry may be slow to respond to the challenges of climate change resilience. It is acknowledged that some are wedded to historic patterns, materials, and supply chains. Development industry intransigency does not render the new Local Plan unsound. Indeed, the objective of securing high quality, innovative and sustainable new places is entirely sound. For these reasons the Council maintains that the new Local Plan remains sound.</p>	
CON068	REP352	Michael Sparks Associates OBO SEGRO PLC			2	SD3	<p>• Summary: Draft Policy SD3 – Requiring WLC assessments of all major developments will mean that developers face unnecessary financial costs and timescales. The policy should follow the wording of the London Plan and limit this requirement to referred applications.</p> <p>SUSTAINABILITY & ENERGY Draft Policy SD3 – Minimising greenhouse gas emissions <i>B. Major development proposals must be net zero-carbon and:</i> <i>a. Meet the minimum on-site reduction of carbon emissions required by the London Plan; and</i> <i>b. Calculate and minimise emissions from any part of the development that are not covered by Building Regulations (e.g. unregulated emissions).</i> <i>C. Where it is clearly demonstrated that the net zero-carbon target cannot be achieved on-site, development proposals must make contributions to meet the identified shortfall through:</i> <i>a. A cash-in-lieu contribution to Lewisham’s carbon offset fund; and/or</i> <i>b. Appropriate off-site measures where these can be demonstrated to be deliverable.</i></p>	<p>The Council notes the comments made in relation to the new Local Plan Policy SD 03 Minimising greenhouse gas emissions.</p> <p>For clarity, the new Local Plan Policy SD 03 has been prepared and produced with the London Plan. The Greater London Authority has not challenged the new Local Plan’s approach to this matter.</p> <p>For further clarity, the London Plan Paragraph 9.2.1 is clear in stating at that</p> <p><i>“The Mayor is committed to London becoming a zero-carbon city. This will require reduction of all greenhouse gases, of which carbon dioxide is the most prominent.¹⁵³ London’s homes and workplaces are responsible for producing approximately 78 per cent of its greenhouse gas emissions. If London is to achieve its objective of becoming a zero-carbon city by 2050, new development</i></p>	No further action required in relation to the new Local Plan.

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							<p><i>D. Major development proposals are encouraged to assess embodied carbon emissions and maximise opportunities to reduce these emissions.</i></p> <p><i>E. Details of the approach used to meet the net zero-carbon target must be clearly set out in an Energy Strategy submitted as part of the Sustainable Design Statement.</i></p> <p><i>F. For commercial office development, energy consumption should be reduced to 55 kWh/m2/year and space heating demand should be reduced to 15 kWh/m2/year.</i></p> <p>Position: Object</p> <p>3.25 Low carbon growth is a leading objective for SEGRO and this is reflected in its commitment to be a net zero business by 2030. For SEGRO that includes scope 1, 2 and 3 emissions. SEGRO also designs its buildings to help its business occupiers to minimise their emissions, many of which have set their own path to net zero. Business occupiers power demands can vary significantly and the path to net zero will look different as a result.</p> <p>3.26 Many employment developments are undertaken on a speculative basis to provide flexible space (for use across classes E, B2 and B8) that can be occupied, sometimes at short notice, to meet businesses needs. The unregulated emissions from employment buildings can therefore vary dramatically depending on whether it is to be used for general storage, or potentially a cold store, or a manufacturing use that may have far higher energy demands.</p> <p>3.27 It is therefore unreasonable to require all major developments to provide an assessment of unregulated energy demands when these will not be known and there is considerable variance between what this could comprise. The preparation and examination of the London Plan reached this same conclusion. A possible consequence for Lewisham is that the creative industries and manufacturers who often have some of the higher energy demands will no longer be able to be accommodated in the borough, which would be damaging to the CEZ.</p> <p>3.28 The approach to securing net zero needs to consider a balanced approach and requires upgrades to infrastructure across the UK. It should not be applied on a simple site by site basis as this will penalise employment development.</p> <p>3.29 Section D of draft policy SD3 is too onerous and requires more than Policy SI 2, the equivalent policy in the London Plan.</p>	<p><i>needs to meet the requirements of this policy.”</i></p> <p>The Council notes that it is within the gift of the new Local Plan to identify a different but complimentary approach, to the London Plan, that addresses growth across Lewisham.</p> <p>Within this context the Council welcomes the respondent’s stated commitment to becoming a net-zero business, and it is assumed developer, by 2030. However, within this context, the Council is surprised that the respondent appears unwelcoming of measures that will help contribute towards meeting the shared objective of net zero.</p> <p>Furthermore, the implied statement that net zero can only be achieved through the front-loading of nationwide infrastructure improvement, and that site specific measures are inconsequential is contrary to national policy and therefore unsound. The mutually beneficial objectives sought through this policy, and the wider new Local Plan, are too important, not only for place-making but also for our wider society. For these reasons the Council maintains that the policy remains sound.</p>	

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							<p>The London Plan states that “development proposals referable to the Mayor should calculate whole-life cycle carbon (WLC) emissions”, which means that many major planning applications in London are not expected to provide WLC assessments. The Borough Council however require WLC assessments from all major applications, which will place unnecessary costs on developers and potentially extend the application process.</p> <p>Proposed wording: <i>B. Major development proposals must be net zero-carbon and:</i> <i>a. Meet the minimum on-site reduction of carbon emissions required by the London Plan; and</i> <i>b. Calculate and minimise emissions from any part of the development that are not covered by Building Regulations (e.g. unregulated emissions).</i> <i>C. Where it is clearly demonstrated that the net zero-carbon target cannot be achieved on-site, development proposals must make contributions to meet the identified shortfall through:</i> <i>a. A cash-in-lieu contribution to Lewisham’s carbon offset fund; and/or</i> <i>b. Appropriate off-site measures where these can be demonstrated to be deliverable.</i> <i>D. Referable Major development proposals are encouraged to assess embodied carbon emissions and maximise opportunities to reduce these emissions.</i> <i>E. Details of the approach used to meet the net zero-carbon target must be clearly set out in an Energy Strategy submitted as part of the Sustainable Design Statement.</i> <i>F. For commercial office development, energy consumption should be reduced to 55 kWh/m2/year and space heating demand should be reduced to 15 kWh/m2/year.</i></p>		
CON068	REP353	Michael Sparks Associates OBO SEGRO PLC			2	SD13	<p>• Summary: Draft Policy SD13 – As with Policy SD3, this policy should be reworded so that net-zero waste is a requirement of referred applications, instead of all major applications.</p> <p>New Draft Policy SD13 – Design to support the circular economy <i>A. Development proposals should apply circular economy principles in order to conserve resources and improve resource efficiency, with reference to London Plan policy S17 (Reducing waste and supporting the circular economy).</i> <i>B. Major development proposals should aim to be net zero-waste. Development proposals that meet the threshold for being referable to the Mayor of London must submit a Circular</i></p>	<p>The Council notes the comments made in relation to the new Local Plan Policy SD 13 Design to support the circular economy.</p> <p>The Council notes and welcomes the respondent’s positive message that as a business they aim to “maximise positive use of waste and materials”. Within this context, the Council considers it surprising that they believe the new Local Plan objective to be “onerous”.</p> <p>For clarity, the new Local Plan Policy SD 13 states that – “Major development</p>	No further action required in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							<p><i>Economy Statement, as part of the Sustainable Design Statement, in line with London Plan policy SI7.</i></p> <p>Position: Object</p> <p>3.30 As part of its Responsible SEGRO commitments and group policies to minimise waste, SEGRO aims to maximise positive use of waste and materials.</p> <p>3.31 Section B of this policy is onerous and requires more than Policy SI 7, the equivalent policy in the London Plan. The London Plan states that “<i>referable applications should aim to be net zero-waste</i>”, which means that many major planning applications in London are not expected to meet this target.</p> <p>The Borough Council however, sets a net-zero waste target for all major developments, which will cover many more developments including some that would be of very small scale. This will create issues at operational stages, particularly for speculative developments where end-users are not known.</p> <p>3.32 This requirement may also deter businesses from locating in Lewisham where the waste requirements are more difficult to meet, instead favouring other boroughs which have a less onerous policy. The Council should therefore follow the wording of the London Plan policy or provide more clarity and guidance on how businesses will achieve net-zero waste.</p> <p>Proposed wording: <i>A. Development proposals should apply circular economy principles in order to conserve resources and improve resource efficiency, with reference to London Plan policy SI7 (Reducing waste and supporting the circular economy).</i> <i>B. Development proposals that meet the threshold for being referable to the Mayor of London should aim to be net-zero waste and must submit a Circular Economy Statement, as part of the Sustainable Design Statement, in line with London Plan policy SI7.</i></p>	<p><i>proposals should aim to be net zero-waste.”</i></p> <p>The Council considers that the policy wording is both clear and sufficiently flexible to allow the balanced consideration of proposals that fail to meet this objective. Where such proposals are encountered by decision-takers, it is reasonable to assume that development partners will present technical evidence to demonstrate why net zero waste cannot be achieved, and what measures can be introduced to realise a progressive minimisation.</p> <p>As with the parallel objective of achieving net zero energy use, the Council notes that it is within the gift of the new Local Plan to identify a different but complimentary approach, to the London Plan, that addresses growth across Lewisham. In this instance, the new Local Plan policy accounts for Lewisham’s, and the wider South East of London’s, capacity to pool and manage waste. For these reasons the Council maintains that the policy remains sound.</p> <p>Finally, the suggestion that the Council provide guidance on how businesses could achieve net zero waste is noted. Such guidance already exists – for example, the Waste & Resources Action Programme (WRAP) is a well-established source of tested guidance (such as the Seven Steps Towards Net Zero). Nevertheless, the Council and its waste management partners could consider providing further place-specific guidance outside of the plan-making process.</p>	
CON069	REP354	Savills OBO Notting Hill Genesis (NHG)			3	LWA 3 Malham Road	<p>LEWISHAM LOCAL PLAN REGULATION 19 PROPOSED SUBMISSION DOCUMENT REPRESENTATIONS SUBMITTED ON BEHALF OF NOTTING HILL GENESIS</p> <p>We are instructed by Notting Hill Genesis (NHG) to submit representations in response to the Lewisham Local Plan</p>	<p>The Council notes the comments made in relation to the new Local Plan by the respondent – specifically in relation to land being promoted as an alternative or omission site. The new Local Plan identifies specific deliverable and developable sites with capacity to meet</p>	No further action required in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							<p>Regulation 19 ‘Proposed Submission Document’ January 2023 (“the draft Local Plan”) in the context of their land ownership at 1-25 Malham Road Industrial Estate (“the site”), located within the London Borough of Lewisham (LBL). Attached is a plan of the site outlined in red in Appendix A.</p> <p>The site has significant redevelopment potential and we consider it could deliver a mixed use redevelopment comprising new residential uses, including affordable housing and continued use and re-provision of high quality employment floorspace. This letter should be read in conjunction with the previous representations (dated 09 April 2021) submitted to the Council in response to the Lewisham Local Plan Regulation 18 ‘Main Issues and Preferred Approaches Document’ January 2021.</p> <p>Background <i>Notting Hill Genesis</i> NHG is a non-profit housing developer, member of the G15 group of major London housing associations and a registered provider of social housing. NHG own and manage more than 66,000 homes in London and the southeast. NHG work in the community, providing homes for around 170,000 people along with social programmes, economic regeneration initiatives and the services and support residents’ needs. 583 of these homes are in Lewisham, which are a mixture of General Needs, intermediate tenures, Market Rent and Temporary Housing, NHG is keen to extend their reach within Lewisham and help the Council deliver their strategic goals and housing targets. NHG’s primary purpose is to provide homes for lower-income households in and around London. NHG have a record of strategic regeneration across London to deliver high quality market and affordable housing. NHG excel in creating high quality new homes and provide a wide range of housing solutions, working closely with residents and partners to meet local needs.</p> <p><i>Site and Planning Policy Context</i> The site is circa. 0.57 hectares and is bound by Beadnell Road to the west, Dalmain Road to the north, industrial units to the east and Malham Road to the south. The site comprises of five, single storey industrial buildings accessed via a private entrance off Malham Road and accommodates 23 commercial units currently used for light industrial and storage (Use Classes B2 and B8) and office uses (Use Class E, formerly B1). The site forms part of the wider Malham Road Industrial Estate, which is circa 3.63 hectares and accommodates a mix</p>	<p>the Borough’s housing, employment, and retail needs over the plan period.</p> <p>For clarity, the Malham Road Industrial Estate is an active and successful Locally Significant Industrial Site located within the Lewisham West Area. The location is identified under Figure 18.2. The site is not subject to an allocation – as a successful employment site this is not considered necessary – and is addressed and protected through new Local Plan Policy EC 6 Locally Significant Industrial Sites (LSIS).</p> <p>The comments made about the condition of the Malham Road LSIS are noted, as are those about the potential for further industrial intensification. Regardless of the stated condition of the units the Estate is successful and not considered appropriate for co-location. The Council highlights that the new Local Plan supporting evidence assessed the Malham Road LSIS and concluded that it remains identified as LSIS, as it is an inappropriate location for collocation.</p> <p>For clarity, the London Plan Policy E7 Industrial intensification, co-location, and substitution is supportive and encourages intensification of such sites. The new Local Plan Policy EC 6 seeks to support and facilitate this objective through the decision-taking.</p> <p>Finally, it is noted that the Industrial Estate is identified and protected through the Neighbourhood Plan for Crofton Park and Honor Oak Park (HopCroft Plan) 2017-2027. It is addressed and protected through Policy E2 Malham Road Employment Regeneration Area. This allows for the consideration of proposals for the regeneration of the Malham Road Local Employment Location (LEL) for employment uses in Classes E</p>	

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							<p>of uses including a place of worship, hot food takeaways and residential uses.</p> <p>The wider area on Beadnell Road and Dalmain Road comprise of predominantly residential uses within two and three storey Victorian terraces. The site is situated in close proximity to Forest Hill District Town Centre, which lies approximately 800m (9 minute walk) south of the site and contains numerous shops, services and community facilities.</p> <p>The site has a Public Transport Accessibility Level (PTAL) rating of 2, indicating moderate accessibility to public transport out of a maximum score of 6b. The site is located approximately 800 metres (9 minute walk) from Forest Hill Station, providing access to Southern and London Overground services. There are also a number of bus stops located on A205 Stanstead Road, providing access to Lewisham Shopping Centre and Plumstead. The site is subject to the following adopted (current) planning policy designations:</p> <ul style="list-style-type: none"> • Forms part of site allocation ref.SA50 Malham Road Local Employment Location; • PTAL 2; • Flood Zone 1; and • The building is not locally or statutorily listed, nor are there any locally or statutorily listed buildings located in the immediate surrounding area. The site is not located within a Conservation Area. <p>The draft Local Plan proposes that the site be subject to the following emerging planning policy designations:</p> <ul style="list-style-type: none"> • Forms part of a Locally Significant Industrial Estate (LSIS); • Located within a Growth Node; and • Located on a Growth Corridor. <p>We note the draft Local Plan references or illustrates the site and the wider Malham Industrial Estate in Table 8.1 (Lewisham's Employment Land Hierarchy) – LSIS; Figure 8.1 (Employment Land Hierarchy); Figure 18.2 (West Area Key Diagram); and Schedule 4 (Designated employment land).</p> <p>Lewisham Local Plan Regulation 19 Proposed Submission Document – Representations</p> <p><i>Commercial and Mixed Use Redevelopment</i> Previous representations (including a 'call for sites' form) in relation to the site were submitted to the Council on 09 April</p>	(g) and B2 to provide a range of employment space (Office/ Research and Development/ Light Industry).	

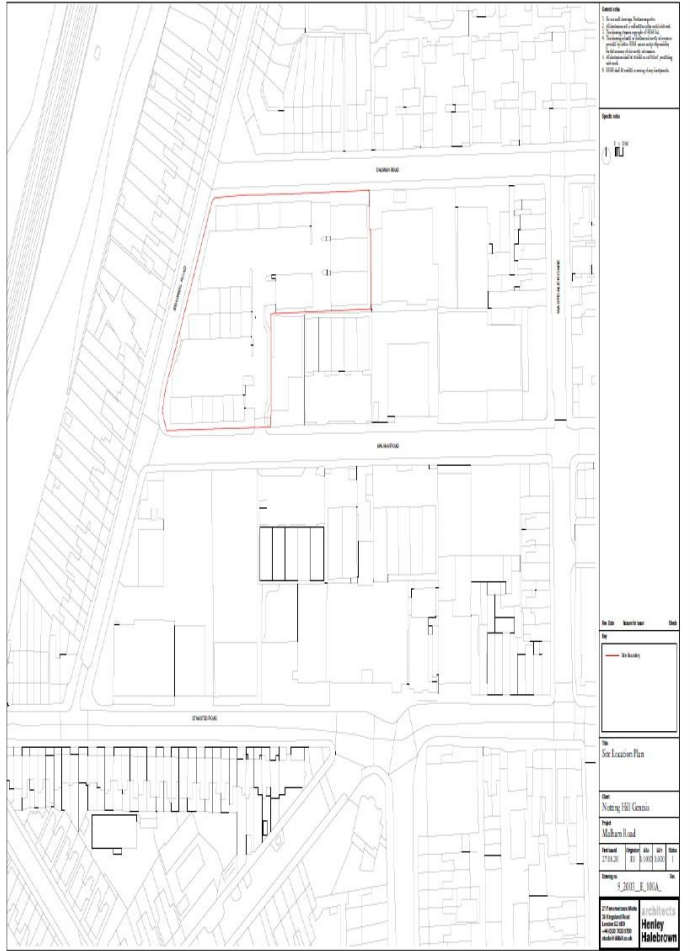
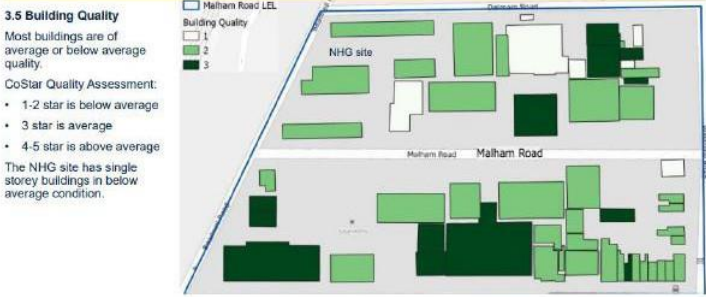
Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							<p>2021. The ‘Lewisham Local Plan Regulation 18 Consultation Statement’ dated September 2022 sets out the Council’s response, which highlights that whilst the site has not been added as an allocation at this stage of the plan process, the site may be considered through a plan review in due course. A specific response in relation to the site’s LSIS designation is provided as follows:</p> <p><i>“Comments are noted. The designation of Malham Road Industrial Estate as an LSIS has been informed by the Lewisham Employment Land Study that identifies the site as a successful employment site with low vacancy rates and high demand for employment uses. Fragmentation of the site, through co-location, will restrict the operational nature of the employment uses, undermine the viability of this important LSIS and will be contrary to ensuring sufficient industrial land and capacity to meet the Borough’s future needs.”</i></p> <p>It is important to emphasise that the Employment Land Study 2019 (‘the Study’) does not reference Malham Road Industrial Estate as a ‘successful employment site’. On the contrary, the Study identifies that the existing units are generally of poor quality and dated, and that some units are coming towards the end of their economic life. Appendix 1 (C15) of the Study further sets out that the site has low compatibility with its surrounding residential uses and that some units may not be reoccupied if they become vacant due to their poor quality. The Study additionally references a ‘to let’ sign at the entrance of the estate and that some of the older units appeared to be vacant. Whilst these units have now been occupied with short-term tenants, the deteriorating condition of the units means that it is becoming increasingly difficult to secure tenancies as occupiers continue to seek a better grade of offering.</p> <p>The Study states that such sites should seek to intensify wherever possible and emphasises that there is an opportunity to redevelop the more dated units to provide better quality units that meet modern occupier requirements. An extract is provided below:</p> <p><i>“The estate is compact and there is limited yard space and most of the units have a limited number of parking spaces. The location is not optimum, being situated within a residential area, with poor prominence and access to amenities. Currently, there is low vacancy on the site and the units are generally dated and seem to have been built at different points in time. But the estate is in a well-defined area and there is demand for this type of industrial accommodation. There is an opportunity</i></p>		

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							<p><i>to redevelop the more dated units to provide better quality units that meet modern occupier requirements.” [Own Emphasis].</i></p> <p>It is important to highlight that the Study is now over 4 years old and prepared prior to Brexit, the Covid-19 Pandemic, and the London Plan (2021). The London Plan Policy E7 (Policy E7 Industrial intensification, co-location and substitution) states that all boroughs are encouraged to explore the potential to intensify industrial activities on industrial land to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses. The London Plan further encourages more efficient use of land through higher plot ratios having regard to operational yard space requirements and to also take a proactive approach to the management of vacancy rates to reach a level appropriate to the efficient functioning of the industrial market.</p> <p>The key observations from the Study, as well as a CoStar Quality Assessment (see Appendix B) is that the site generally contains a high proportion of poor quality and dated buildings and has a generally low plot ratio, with parts of the site to the west, which comprise single storey buildings with generous yards, having a plot ratio of 36%, which falls significantly short of the London Plan’s 65% target ratio.</p> <p>Co-location would not fragment the site, undermine viability, restrict the operational nature of the employment uses or be contrary to ensuring sufficient industrial land and capacity to meet the Borough’s future needs. On the contrary, given the inefficient, poor quality and dated nature of the units, as well as the already wide number of uses outside of commercial and light industrial use on the site (including a place of worship, hot food takeaways and residential), we consider in-principle policy support to allow intensification to occur via a mixed use redevelopment would incentivise a range of options and provide a robust approach to withstand current and future challenges and provide better quality units that meet modern occupier requirements. This would provide more certainty to support the long-term viability of the site as a successful and sustainable employment location, as well as providing the opportunity to deliver other public benefits e.g. affordable housing. In practice, without in-principle policy support, we consider demand will continue to fall exponentially as units become more dated.</p>		


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							<p>We would highlight that Malham Road Industrial Estate appears to be the only employment site with ‘mixed B uses’ referenced within table 5.1 (employment site assessment summary) of the Study where intensification via co-location is not acceptable. This would seem somewhat inconsistent and contrary to the draft Local Plan’s Key Spatial Objective (7) to “<i>protect and enhance the employment quarter at Malham Road</i>” as well as draft Policy LWA3 and EC2.</p> <p>Draft Policy LWA3 (d) states that the growth and evolution of Forest Hill District Centre and its surrounds as a key hub of creative, cultural and community activity will be supported and reinforced by “<i>extending the boundary of the Malham Road LSIS to include 118 Stansted Road, along with protecting and enhancing uses within the LSIS that make a positive contribution to the Cultural Quarter</i>”. It is not understood how the site could make a positive contribution to the Cultural Quarter without co-locating complimentary uses, including residential.</p> <p>The draft Local Plan policy EC2 (Protecting employment land and delivering new workspace) states that within LSIS, proposals should retain and wherever possible deliver net gains in industrial capacity, including by intensifying the use of land.</p> <p>Given the above, we consider the current drafting of the draft Local Plan policies to be inconsistent, overly-prescriptive and insufficiently flexible and therefore unlikely to support the site’s full redevelopment potential and long-term viability as a successful and sustainable employment location. The draft Local Plan is therefore not justified or effective and not consistent with the London Plan (specifically Policy E7) because it does not promote, support or encourage the potential intensification of the Site. It is also not consistent with national policy, which requires planning policies support development that make efficient use of land.</p> <p>We therefore respectfully request the site be designated as a Mixed Use Employment Site Allocation to include industrial and residential uses, which would be more fitting to its function and residential location within a Growth Node and Growth Corridor. There is a significant opportunity for the site (and potentially the wider Malham Industrial Estate) to meet a range of priorities for Lewisham, including the delivery of an enhanced employment provision, new homes and new affordable homes.</p>		

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							<p>The draft Local Plan's definition of a 'Mixed Use Employment Location (MEL) is:</p> <p><i>"Designated land within Lewisham's employment land hierarchy. MELs consist of large redundant and/or underused industrial sites where plan-led, mixed-use redevelopment is permitted to support strategic regeneration objectives."</i></p> <p>In light of the site's wide number of uses outside of commercial and light industrial use, and the underused (i.e. see commentary regarding plot ratio above) and generally dated nature of units, we consider the site would wholly meet the Council's definition of a MEL. This would enable the site to support the strategic regeneration objectives outlined within the draft local plan Key Spatial Objective 7 and policies EC2 and LWA3.</p> <p>This would ensure that the draft Local Plan is justified, effective and consistent with national and regional policy.</p> <p><i>Residential</i></p> <p>NHG fully supports draft Local Plan Policy HO1 that makes appropriate reference to the London Plan Table 4.1 which sets out a minimum 10 year housing target for Lewisham of 16,670 new homes over a 10 year period (2019/20 to 2028/29) which equates to 1,667 per annum. We also note the inclusion of an up to date housing trajectory and five year housing supply for the Borough. This sets out that the Council will ensure that the London Plan ten year housing target is exceeded. However, it is important to note the Lewisham SHMA (2022) indicates a significantly higher housing need for Lewisham of 2,334 per annum over a 10 year period (2021 to 2031) which includes a cap based on the 2021 London Plan figure. Without the cap, the minimum need is 3,336. A comprehensive design led mixed use redevelopment of the site would make a significant contribution towards housing provision and the above housing targets.</p> <p>NHG strongly advocates for the delivery of new affordable homes to meet Lewisham's housing requirements. NHG acknowledges the Council's threshold approach to viability in accordance with the London Plan Policy H5 and the principle of increased affordable housing, and for new homes to be genuinely affordable, subject to viability. We fully support clarifications to Policy HO3 Part F (Threshold approach to viability) and Part G (Viability Tested Route) that ensure conformity and consistency with the London Plan and the Affordable Housing and Viability Supplementary Planning</p>		

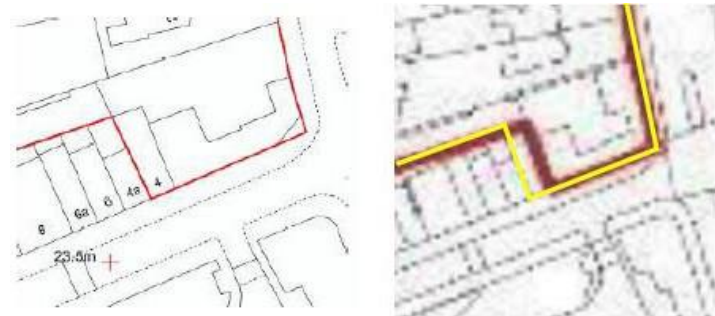
Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							<p>Guidance. We also note that the Lewisham SHMA (2022) indicates that Lewisham's median house prices are more than 10 times the average household income, resulting in a net need for 2,818 affordable dwellings each year. The site represents a key opportunity for the delivery of a mixed use redevelopment brought forward by a leading housing association to significantly contribute towards affordable housing and associated housing targets in Lewisham.</p> <p>Public Examination On behalf of our client we consider it is necessary to participate in the Examination in Public (EiP) in due course, including attending the oral part of the EiP. We would be grateful if you could keep us updated.</p> <p>Conclusion and recommendations: Whilst NHG is generally supportive of the 'spirit' of the draft Local Plan which seeks to improve employment provision and provide new homes and new affordable homes, there are a number policies which require further consideration and updating as elaborated in this letter and previous representations dated 09 April 2021.</p> <p>The current policy approach to the site and wider Malham Road Industrial Estate would constrain any intensification and potential redevelopment options at the site. The draft Local Plan as currently drafted is not effective in its delivery, would not be consistent with national policy and would not be consistent with the London Plan or its own strategic objectives and policies. The draft Local Plan as currently drafted is therefore not sound.</p> <p>However, with further amendments, we consider there is the potential that the draft Local Plan could be sound. It is considered that the suggested amendments will allow development to be optimised in the Borough and for housing to be delivered ambitiously to meet housing need.</p> <p>To reiterate, the site has significant redevelopment potential and we believe it could provide a mixed use redevelopment comprising new residential uses, including affordable housing and continued use and re-provision of high quality employment floorspace. This would provide more certainty to support the long-term viability of the site as a successful and sustainable employment location. NHG are committed to working with the Council to help deliver their strategic goals, the regeneration of sites in the Borough and benefits to local communities.</p>		


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							<p>Appendix A: Site Location Plan</p>  <p>Appendix B: Malham Road Industrial Estate Building Quality</p> 		
CON070	REP355	Avison Young OBO Frank Griffiths			3	LCA Randlesdown Road	<p>The key issue in the representations is the incorrect de-designation of 4 Randlesdown Road from the Bromley Road SIL and the subsequent incorrect inclusions within the Bellingham Local Centre.</p> <p>The property and land at 4 Randlesdown Road are lawfully in B2/B8 use. The attached document clarifies this error and</p>	<p>The Council notes Avison Young's introductory comments and site context in relation to the land on the corner of Randlesdown Road and Bromley Road.</p> <p>The Council welcomes that the landowner's objectives for the site have</p>	No further action required in relation to the new Local Plan.

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							<p>invites the Council to correct the boundary prior to submitting the Plan to the Inspectorate.</p> <p>Dear Sir / Madam,</p> <p>LEWISHAM LOCAL PLAN: REGULATION 18 CONSULTATION: WRITTEN REPRESENTATIONS OBO FRANK GRIFFITHS</p> <p>These representations are made on behalf of our client, Frank Griffiths, in relation to the Regulation 19 Local Plan Consultation: Main Issues and Preferred Approach to Proposed Changes to the Adopted Policies Map being undertaken by the London Borough of Lewisham. The consultation material comprises:</p> <ul style="list-style-type: none">• Lewisham Local Plan: Proposed Submission Document January 2023.• Proposed Policies Map and Schedule of Proposed Changes to the Adopted Policies Map December 2022.• Integrated Impact Assessment and Non-technical Summary December 2022.• Habitats Regulations Assessment December 2022 <p>We previously made representations in April 2021 in relation to the Regulation 18 version of the Local Plan. Since the drafting of those representations, our clients’ objectives for the site have changed and are now aligned with the Council’s continued designation of the site for industrial purposes as part of the Strategic Industrial Location (SIL) in so far as that they will promote an industrial led redevelopment of the site.</p> <p>Site Context</p> <p>The site is located at the junction of Randlesdown Road and Bromley Road, Lewisham. It comprises several existing buildings and uses as set out in Table 1, below.</p> <table><tr><th>Plot</th><th>Existing Use</th></tr><tr><td>202 - 204 Bromley Road</td><td>B2 / B8 - Workshop and Premises</td></tr><tr><td>206 Bromley Road</td><td>B2 / B8 - Workshop and Premises</td></tr></table>	Plot	Existing Use	202 - 204 Bromley Road	B2 / B8 - Workshop and Premises	206 Bromley Road	B2 / B8 - Workshop and Premises	changed and are now aligned with its use as designated industrial land.	
Plot	Existing Use														
202 - 204 Bromley Road	B2 / B8 - Workshop and Premises														
206 Bromley Road	B2 / B8 - Workshop and Premises														

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action																				
							<table><tr><td>208 Bromley Road</td><td>Sui Generis – Car Wash</td></tr><tr><td>Flat 1 – 208 Bromley Road</td><td>C3 - Residential</td></tr><tr><td>Flat 2 – 208 Bromley Road</td><td>C3 - Residential</td></tr><tr><td>Front at 210 Bromley Road</td><td>Sui Generis</td></tr><tr><td>Land at Rear of 210 Bromley Road</td><td>B8 – Land used for storage</td></tr><tr><td>Flat A – 210 Bromley Road</td><td>C3 - Residential</td></tr><tr><td>Flat B – 210 Bromley Road</td><td>C3 - Residential</td></tr><tr><td>2 Randlesdown Road</td><td>B2 / B8 – Workshop and Storage</td></tr><tr><td>2a Randlesdown Road</td><td>B2 / B8 – Workshop and Storage</td></tr><tr><td>4 Randlesdown Road</td><td>B2 / B8 – Workshop and Storage</td></tr></table> <p>Table 1: Existing Uses at Randlesdown Road</p>	208 Bromley Road	Sui Generis – Car Wash	Flat 1 – 208 Bromley Road	C3 - Residential	Flat 2 – 208 Bromley Road	C3 - Residential	Front at 210 Bromley Road	Sui Generis	Land at Rear of 210 Bromley Road	B8 – Land used for storage	Flat A – 210 Bromley Road	C3 - Residential	Flat B – 210 Bromley Road	C3 - Residential	2 Randlesdown Road	B2 / B8 – Workshop and Storage	2a Randlesdown Road	B2 / B8 – Workshop and Storage	4 Randlesdown Road	B2 / B8 – Workshop and Storage		
208 Bromley Road	Sui Generis – Car Wash																												
Flat 1 – 208 Bromley Road	C3 - Residential																												
Flat 2 – 208 Bromley Road	C3 - Residential																												
Front at 210 Bromley Road	Sui Generis																												
Land at Rear of 210 Bromley Road	B8 – Land used for storage																												
Flat A – 210 Bromley Road	C3 - Residential																												
Flat B – 210 Bromley Road	C3 - Residential																												
2 Randlesdown Road	B2 / B8 – Workshop and Storage																												
2a Randlesdown Road	B2 / B8 – Workshop and Storage																												
4 Randlesdown Road	B2 / B8 – Workshop and Storage																												
CON070	REP356	Avison Young OBO Frank Griffiths			3	LCA Randlesdown Road	<p>A site plan is enclosed at Appendix I. Note in the earlier correspondence, no. 4a Randlesdown Road ‘Hot-Food Takeaway’ was incorrectly noted as being no.4 Randlesdown Road. In fact, 4 Randlesdown Road is lawfully in B2/B8 use. For the avoidance of doubt the redline is annotated over the below aerial image.</p>  <p>Figure 1 – Site Area</p>	The Council agrees that the SIL boundary should include no.4 Randlesdown Road whilst the row of retail units/takeaways should lie outside of the SIL boundary.	The Council will consider minor modifications to the boundary of the Bromley Road SIL and Local Centre and to Table 21.5 Table showing Town Centres and Primary Shopping Centres, to rectify the error.																				
CON070	REP357	Avison Young OBO Frank Griffiths			2	EC 02 Randlesdown Road	<p>Policy Review <i>Policy EC2: Protecting Employment Sites and Delivering New Workspace</i></p> <p>We have assessed the supporting text underpinning Draft Policy EC2 and note at para. 8.10 that</p>	The Council notes and welcomes Avison Young’s support in relation to new Local Plan Policy EC 2 Protecting employment land and delivering new workspace and Table 8.1 Lewisham’s Employment Land Hierarchy.	No further action required in relation to the new Local Plan.																				

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							<p><i>“Our expectation is that there will be no net loss of industrial capacity in the Borough and that net gains are delivered wherever possible. Industrial capacity in Lewisham will be calculated on the basis of the existing commercial and industrial capacity on a site which is currently in active employment use, and covers Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and related Sui Generis uses.”</i>, whilst in para 8.11,</p> <p><i>“Development proposals should retain industrial capacity and seek net gains through site intensification, including additional floorspace, wherever possible and appropriate. However it is recognised that net gains may not always be feasible. For instance, some types of industrial uses require a significant amount of operational yard or servicing space to function effectively”</i></p> <p>This context, and the formulation of Policy EC2, criteria A, B(a), and Table 8.1, are supported.</p>		
CON070	REP358	Avison Young OBO Frank Griffiths			2	EC 05 Randlesdow n Road	<p><i>Policy EC5: Strategic Industrial Locations (SIL)</i> We have assessed the formulation of Policy EC5, criteria A – C, and the objectives and requirements of the Policy are supported.</p> <p>This approach to the Bromley Road SIL is considered in accordance with the London Plan.</p>	The Council notes and welcomes Avison Young’s support in relation to Policy EC 5 Strategic Industrial Locations.	No further action required in relation to the new Local Plan.
CON070	REP359	Avison Young OBO Frank Griffiths			2	LCA 04 Randlesdow n Road	<p><i>Policy LCA4: A21 corridor</i> We note that this Policy refers to the objectives of the A21 Development Framework as adopted in March 2022. We previously engaged with the Council on this document – see our representation dated 11th November 2021. The adopted version of the Framework includes Site 10 – Land at Randlesdown Road in which a series of multi-storey non-residential floorspace (c. 4,725sqm).</p> <p>This is set within the context of the Guiding Principle #2 which seeks to “.... <i>meet local employment and social infrastructure needs</i>”, the requirement for the re-provision of commercial and employment space to retain local jobs and strengthen local facilities at p.48 and the identification of the site for employment led development at p.49.</p> <p>The approach in Policy LCA4 criteria A in which “<i>Development proposals must demonstrate how they have responded positively to the A21 Development Framework through the design-led approach</i>” is therefore supported.</p>	The Council notes and welcomes Avison Young’s support in relation to Policy LCA 4: A21 Corridor.	No further action required in relation to the new Local Plan.
CON070	REP360	Avison Young			2	LCA 04	Clarification	The Council agrees that the SIL boundary should include no.4 Randlesdown Road	The Council will consider minor modifications to the boundary of

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		OBO Frank Griffiths				Randlesdown Road	<p>The Council includes a revised SIL boundary and designates Bellingham Local Centre Frontages. In identifying properties within each designation, the Council makes minor, but fundamental, errors.</p> <p><i>Bromley Road SIL boundary</i> On p.806 of the Local Plan, the Council notes that the boundary of the Bromley Road includes changes to the shopping frontages along Randlesdown Road de-designated from SIL. The accompanying change in the Annex 2 Schedule of Changes to Proposals Map demonstrates the land that is de-designated and incorrectly includes 4 Randlesdown Road in this de-designation. Below is the screenshot of the site ownership (left) – inclusive of 4 Randlesdown Road – and the Council’s SIL de-designation / Local Centre boundary which is shown to exclude 4 Randlesdown Road. The redline should be moved west to include 4 Randlesdown Road, as demonstrated with the yellow line.</p>  <p>Figure 2 – Suggested amendments to SIL Boundary</p> <p><i>Bellingham Local Centre Frontages</i> On p.808 of the Local Plan, the Council refers to “Randlesdown Road: 4 to 50 and the Fellowship”. On the basis that 4 Randlesdown Road is lawfully in a B2/B8 use – a point that the Council has acknowledged in previous planning applications and appeal decisions (ref: DC/14/087384 / APP/C5690/A/14/2223348), the drafting is incorrect and should read as “Randlesdown Road: 4a to 50 and the Fellowship”.</p> <p>In a similar vein, the proposed Bellingham Local Centre is incorrect and should exclude 4 Randlesdown Road and should also consider the squared boundary on the junction of Randlesdown Road and Bromley Road, as per the below image.</p>	whilst the row of retail units/takeaways should lie outside of the SIL boundary.	the Bromley Road SIL and Local Centre and to Table 21.5 Table showing Town Centres and Primary Shopping Centres, to rectify the error.

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							 <p>Figure 3 – Suggested amendments to Local Centre boundary</p> <p>The incorrect drafting of the SIL boundary and Local Centre boundary renders the plan unsound in that it has not justified given the incorrect boundary. The Council can regularise these fundamental errors by preparing an addendum showing these clarified boundaries and submit this alongside the Regulation 19 Plan and consultation responses to the Planning Inspectorate.</p> <p>The Council is recommended to consult on these changes, and any other responses and suggested changes received following this consultation response. Given the nature of changes, the Inspector can then instruct these changes to the drafting in the form of main modifications [MMs] to make the plan sound and/or legally compliant.</p>		
CON070	REP361	Avison Young OBO Frank Griffiths			2	LCA 04 Randlesdown Road	<p>The wider objectives for the Plan, in the context of the clients objectives for the Site, are consistent with national and strategic planning policy and enables the delivery of sustainable development in accordance with the policies in the Framework.</p> <p>We would welcome the opportunity to be kept informed of progress relating to the document preparation and should you require any further information relating to these representations, then please do not hesitate to contact me.</p>	The Council notes Avison Young's closing remarks.	No further action required in relation to the new Local Plan.
CON071	REP362	Knight Frank OBO Metropolitan Police Service			3	LWA 03 Havelock House	*Representation includes submitted forms for Housing and Monitoring*		
CON072	REP363	DWD OBO			3	EC 02	<p>Policy EC 2 (Protecting employment land and delivering new workspace)</p> <p>Big Yellow continues to support part A of this policy, which seeks to safeguard employment sites and floorspace for commercial, industrial, and related sui generis uses.</p>	The Council notes and welcomes the support offered to the new Local Plan Policy EC 02 Protecting employment land and delivering new workspace.	No further action required in relation to the new Local Plan.

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		Big Yellow Storage					<p>Furthermore, Big Yellow now supports the amended wording to part B(d) of this draft policy, which states:</p> <p><i>“Outside of SIL, avoiding development that consists solely or predominantly of Class B8 storage or warehousing uses unless:</i></p> <p>i <i>i. The site is currently solely or predominantly in storage and warehousing use; and</i></p> <p>ii <i>ii. Redevelopment proposals comprise of intensification of storage and warehousing uses and/or employment generating uses appropriate to the site;”</i></p> <p>The amended wording now provides flexibility for existing self-storage facilities outside of SIL to be redeveloped and/or intensified for storage and/or other employment generating if it is currently solely in storage use.</p>		
CON072	REP364	DWD OBO Big Yellow Storage			3	EC 06	<p>Policy EC 6 (Locally Significant Industrial Sites)</p> <p>Big Yellow now supports the amended wording of Part C of this policy, which now states:</p> <p><i>“Within LSIS, development proposals for self-storage and large format storage and warehousing uses and facilities will only be permitted where:</i></p> <p>a. <i>The requirements of Policy EC2.B(d) (Protecting employment land and delivering new workspace) are satisfied; or</i></p> <p>b. <i>There is a demonstrable local need or market demand for the use proposed;</i></p> <p>c. <i>The use cannot be reasonably located in a SIL, as evidenced by a detailed site selection exercise; and</i></p> <p>d. <i>The development will include provision of a reasonable proportion of flexible workspace or units for micro, small or medium-sized businesses.”</i></p>	The Council notes and welcomes the support offered to the new Local Plan Policy EC 06 Locally Significant Industrial Sites.	No further action required in relation to the new Local Plan.
CON072	REP365	DWD OBO Big Yellow Storage			3	EC 08	<p>Policy EC 8 (Non-Designated Employment Sites)</p> <p>Big Yellow continues to support part A of this policy, which seeks to protect and not result in the net loss of viable industrial capacity on non-designated employment sites.</p> <p>Big Yellow also supports parts B and C of this policy on the understanding that they simply provide in principle support for employment-led, mixed-use development on these sites, and do not place a requirement for such proposals.</p>	The Council notes and welcomes the support offered to the new Local Plan Policy EC 07 Non-designated Employment Sites.	No further action required in relation to the new Local Plan.
CON072	REP366	DWD OBO Big Yellow Storage			3	LNA 155 Lewisham Way	<p>LEWISHAM LOCAL PLAN: PROPOSED SUBMISSION (JANUARY 2023) – REGULATION 19 CONSULTATION REPRESENTATIONS ON BEHALF OF .BIG YELLOW SELF STORAGE COMPANY LIMITED</p>	The Council notes and welcomes the broadly supportive comments offered in relation to the new Local Plan Lewisham North Area Place Principles. In particular, the Council welcomes the broad-level of support implied in respect of the delivery	No further action required in relation to the new Local Plan.

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							<p>These representations are submitted on behalf of our client, .Big Yellow Self Storage Company Limited ('Big Yellow') to Lewisham Council's consultation document 'Lewisham Local Plan: Proposed Submission Document' (January 2023) ('draft consultation document').</p> <p>Big Yellow owns the freehold interest of the land at 155 Lewisham Way, New Cross, London SE14 6QP ("the Site") as shown on the appended map (Appendix A). These representations relate to the Site.</p> <p>Site and Surrounding Area The Site is located within the boundary of Lewisham Council and extends to an area of approximately 0.46 hectares, located on the north-eastern side of Lewisham Way. The Site is occupied by a Big Yellow self-storage facility which fronts Lewisham Way, and a smaller building set back from the main road which is occupied by several industrial / commercial uses. Both buildings are accessed from Alexandra Cottages and have associated service yards and parking area.</p> <p>Current Policy Position Within the adopted policies map the Site is located within the Lewisham Way Local Employment Location (LEL) which is one of 12 designated LELs within the Borough. In policy terms, LELs are protected for a range of uses within the B Use Class (B1, B8 and where appropriate B2 industry) and appropriate sui generis uses, to support the functioning of the local economy. This policy protects the Site for continued industrial use, including for self-storage purposes (Class B8).</p> <p>Bakerloo Line Extension On 1st March 2021 the Secretary of State for Transport gave safeguarding directions for the Bakerloo Line Extension (BLE). The Site is located within a safeguarded zone as a specific location for the 'Lewisham Way shaft worksite' and within the 'proposed tunnel corridor', more generally.</p> <p>It is not known at this point whether all, some or none of the Site will be required for the BLE. Therefore, any area that is not used or, indeed, once it has been used and is no longer required for the BLE, could come forward for employment development in the plan period.</p> <p>I trust that the information provided clearly sets out Big Yellow's position regarding Lewisham's new Local Plan. Please do not hesitate to contact me if any further clarification is required on the above.</p>	of the Bakerloo Line Extension and the growth/ development opportunities, on this site, that may follow its implementations.	

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							I would be grateful if you could please confirm receipt of these representations and keep me informed of any further consultations moving forward.		
CON073	REP367	TTLP				General	<p>Please see the attached TTLP's response to the Lewisham Local Plan Regulation Proposed Submission Document 2022 (Regulation 19) Consultation</p> <p>Thank you for the opportunity for TTLP (formerly Transport for London Commercial Development) to respond to the New Local Plan Early Engagement. TTLP is a dedicated commercial property company within Transport for London (TfL) and the forms attached in this correspondence are filled in by representatives of the TTLP Development Planning Team in TfL's capacity as a landowner. This submission is separate from any submission that may be made by TfL in its statutory planning role and/or as the strategic transport authority for London.</p> <p>Transport for London Commercial Development would like to thank you for providing the opportunity to comment, and we would appreciate if you could confirm receipt of this representation. Should you have any queries, please do not hesitate to contact us via the propertyconsultation@tfl.gov.uk email or reply to this email.</p> <p>RE: LEWISHAM LOCAL PLAN REGULATION PROPOSED SUBMISSION DOCUMENT 2022 (REGULATION 19) CONSULTATION Thank you for providing the opportunity to comment on the Local Plan regulation 19 consultation. Please note that our representations below are the views of the TTLP planning team (previously known as TfL Commercial Development (CD)) in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.</p> <p>Transport Trading Limited Properties Limited (TTLP) TfL owns around 5,700 acres of land across London and some of the surrounding boroughs, including buildings, land attached to tube, railway and bus stations, highways and worksites. TfL has set up a dedicated commercial property company, Transport Trading Limited Properties Limited (TTLP), to deliver housing in high demand areas and provide an increased revenue stream, and also to manage its commercial estate and undertake other development projects. TTLP is a significant landowner in the</p>	The Council notes Transport Trading Limited Properties Limited (TTLP) introductory comments.	No further action required in relation to the new Local Plan.

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							<p>Borough. Our projects are driven by optimising housing delivery in sustainable locations within developments which are sensitive to their context and communities, and which build on our legacy of design excellence. Key deliverables include 50% affordable housing across our London-wide portfolio of publicly-owned land and the enhancement of public transport infrastructure. Many of our sites are located next to busy transport hubs and our projects play a vital role in meeting London's priorities to build affordable homes, create healthy streets and neighbourhoods, improve air quality, encourage sustainable travel choices, provide transport infrastructure improvements (such as step-free access and better public realm), and support small and independent businesses. We do all this while also generating vital revenue to reinvest in improving London's transport network.</p> <p>TfL is a significant landowner in the borough and the council has included TfL land in a number of site allocations including: - Lewisham Gateway - Land at Conington Road and Lewisham Road - Thurston Road Bus Station - Catford Island - Sainsburys Local and West of Grove Park Station. Additionally, since our response to the Call for Sites consultation (2018) and Regulation 18 Issues and Options Consultation (2021) we have identified two further sites in the borough which may be suitable for industrial and residential development to help meet the policy objectives set out in the draft Local Plan. These are: - Silwood Triangle, which is part of the Surrey Canal Road SIL (please see description and map in appendix 1) - Oldfield Grove, which is within the Lewisham, Catford and New Cross Opportunity Area (please see description and map in appendix 2) TTLP have also prepared a 'Sustainable Development Framework' (SDF)¹ which consists of 120 Key Performance Indicators (KPIs) to monitor and grade the sustainability of TTLP's development schemes, ensuring that good practice is achieved as far as possible. We previously responded (as TfL Commercial Development) to the Call for Sites (October 2018) and the Local Plan Main Issues and Preferred Approaches (9 April 2021). Our current representations should be read alongside our previous responses.</p>		
CON073	REP368	TTLP			2	OL 01	<p>OL1 Delivering an Open Lewisham TTLP supports Policy OL1 criterion A.(C) which aims to direct growth in existing centres. To be positively prepared, the policy should also promote growth in areas which have high transport connectivity but are outside of the identified local centres. This would ensure compliance with London Plan policies GG1 and H1 which aim to direct growth to locations which have the high public transport connectivity.</p>	<p>The Council notes the comments and welcomes the broad support for the new Local Plan's Spatial Strategy as set out under Policy OL 1 Delivering an Open Lewisham.</p> <p>The new Local Plan Spatial Strategy identifies Growth Nodes, Growth Corridors and Opportunity Areas that correspond to</p>	No further action required in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
								<p>their locations. These are identified at Figure 3.3 Borough-wide Spatial Strategy Plan. The Council acknowledges that other places outside of identified centres but that have good access to transport networks may provide opportunities for sustainable growth. However, access to sustainable travel networks, particularly the existing rail network, is not the sole factor driving sustainable development. For example, several of the Borough's existing railway stations are in predominantly suburban locations where the opportunities and the capacity to accommodate focussed growth are limited. This is clearly reflected in Figure 3.1 Character-led growth (Lewisham Characterisation Study, 2020).</p> <p>Should unanticipated opportunities for growth arise, such as those provided by windfall sites, the new Local Plan includes appropriate suite of general planning policies that can inform the decision-taking process.</p> <p>Contrary to the suggestion, a word for word compliance with the London Plan is not a matter of soundness nor a legal requirement. The Council considers that the approach set out under the new Local Plan Spatial Strategy Policy OL 1 is justified, effective and in accordance with national policy.</p>	
CON073	REP369	TTLP			2	QD 06	QD6 Optimising Site Capacity It is welcome that criterion B. identifies that Public Transport Accessibility Levels (PTAL) are key in establishing optimised densities for development sites. To be positively prepared, the policy could go further to identify that areas with the highest PTALs ratings in the borough are likely to be the most suitable areas for higher density development.	<p>The Council notes the comments and welcomes the broad support for the new Local Plan Policy QD 06 Optimising Site Capacity.</p> <p>Contrary to the comments contained in the representation access to sustainable travel networks is not the sole consideration for determining proposals for higher density development (as sustainable development). The new Local Plan's spatial strategy considers several factors – these are set out under Figures 3.1 – 3.3 and ultimately Policy OL1 the Spatial</p>	No further action required in relation to the new Local Plan.

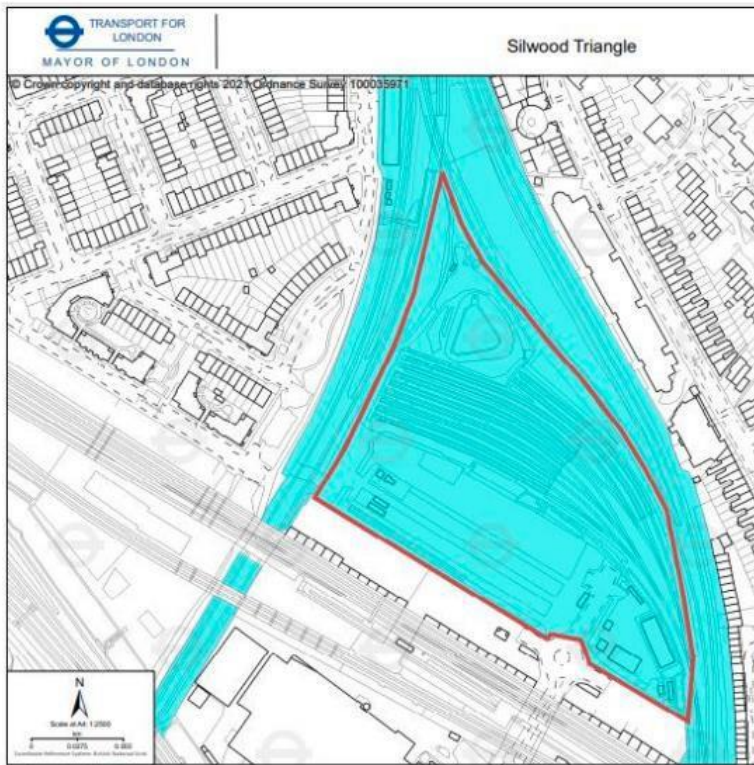
Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
								<p>Strategy. The approach is justified and effective.</p> <p>Should unanticipated opportunities for growth arise, such as those provided by windfall sites, the new Local Plan includes an appropriate suite of general planning policies that can inform the decision-taking process.</p>	
CON073	REP370	TTLP			2	HO 03	<p>HO3 Genuinely Affordable Housing The policies commitment to support the delivery of affordable housing on public land is supported.</p> <p>However, as drafted, the policy is not in line with London Plan Policy H4 (part A paragraph 4) which states that some public landowners have agreements with the Mayor which supports the delivery of “50 per cent affordable housing across their portfolio.” This is further explained in London Plan supporting paragraph 4.4.7 which identifies that public sector landowners with an agreement with the Mayor may provide 50% affordable housing across a portfolio of sites, provided at least 35% affordable housing is provided on each site, with the required affordable housing tenure split on the initial 35%. TfL has a portfolio agreement with the Mayor to deliver 50% affordable housing on TfL development sites across London, and to be consistent with London Plan Policy H4, the draft policy should be amended to recognise public landowners who have a portfolio agreement with the Mayor.</p>	<p>The Council notes and welcomes the supporting comments made in relation to new Local Plan Policy HO 03.</p> <p>London Plan Threshold Approach to Affordable Housing</p> <p>The Council assumes that the respondent is questioning the soundness of the new Local Plan Policy HO 03 on the basis that it does not repeat the London Plan Policy H5 in its entirety. However, the Council considers that the new Local Plan Policy HO3 does make clear cross-reference to the relevant parent policy contained within the London Plan. Consequently, it is clear to the reader the inter-relationship between the two policies and consequently it is unnecessary to repeat verbatim the content of the parent policy.</p> <p>Furthermore, the council notes that National Planning Policy sets out that new plans be positively prepared “in a way that is aspirational but deliverable” (NPPF Para 16). National policy continues by stating that plan-making “should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and consider relevant market signals” (NPPF Para 31). In respect of developer contributions, the NPPF states that “This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such</p>	No further action required in relation to the new Local Plan.

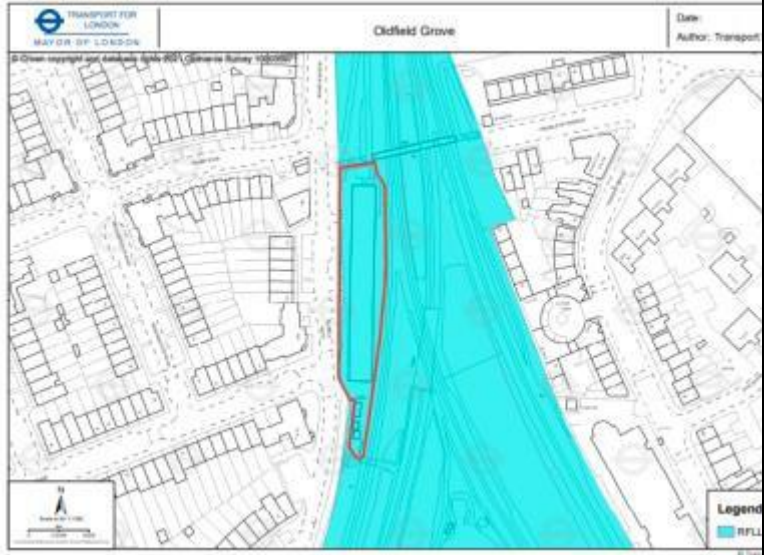
Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
								<p>policies should not undermine the deliverability of the plan” (NPPF Para 34).</p> <p>National planning policy is further expanded upon by NPPG that sets the need to support plan-making through the preparation of viability assessments, which demonstrate the deliverability of planned-for growth – “prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable” (NPPG Paragraph: 039 Reference ID: 61-039-20190315).</p> <p>However, it is understood and established that local plans only ever provide a “snapshot” in time and that the currency of their evidence will over time diminish. Within this context, new Local Plan Policy HO3 (criteria F, G and H) are entirely consistent with national policy and guidance – in that they provide development partners with an opportunity to present evidence that economic conditions have changed. Consequently, the Council considers that the new Local Plan is sound.</p>	
CON073	REP371	TTLP			2	TR 01	TR1 Sustainable Transport and Movement TTLP broadly supports this policy. However, it is suggested that criterion A should include that development proposals must consider Public Transport Access Levels (PTAL) to optimise the capacity of sites.	<p>The Council notes the comments and welcomes the broad support for the new Local Plan Policy TR1 Sustainable Transport and Movement.</p> <p>Contrary to the comments contained in the representation access to sustainable travel networks is not the sole consideration for determining proposals for higher density development (as sustainable development). The new Local Plan’s spatial strategy considers several factors – these are set out under Figures 3.1 – 3.3 and ultimately Policy OL1 the Spatial Strategy. The approach is justified and effective.</p> <p>Should unanticipated opportunities for growth arise, such as those provided by</p>	No further action required in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
								windfall sites, the new Local Plan includes appropriate suite of general planning policies that can inform the decision-taking process.	
CON073	REP372	TTLP			2	EC 09	EC9 Railway Arches TTLP supports the principle that a range of uses are acceptable in arches. There are particular opportunities for arches to contribute to town centres and provide tertiary low-cost business space which is suitable for a range of uses in line with London Plan supporting paragraph 6.2.4. We look forward to working with the borough to increase uses in railway arches managed by TTLP.	The Council notes and welcomes the supporting representation made in relation to the new Local Plan Policy EC 9 Railway Arches. The Council acknowledges that the new Local Plan Policy EC 9 provides an effective and justified mechanism for retaining existing businesses and facilitating the creation of new commercial opportunities involving railway arch location.	No further actions required in relation to the new Local Plan.
CON073	REP373	TTLP			3	LCA	Central Area TTLP is supportive of the policy objectives for the central area.	The Council notes and welcomes the supporting representation made in relation to the new Local Plan Policy relating to site allocations across Lewisham Central Area (Part 3 Chapter 14).	No further actions required in relation to the new Local Plan.
CON073	REP374	TTLP			3	LCA SA 01	1. Lewisham Gateway TfL has significant landholdings within this site allocation and TTLP is supportive of this allocation.	The Council notes and welcomes the supporting representation made in relation to the new Local Plan Policy LCA SA 01.	No further actions required in relation to the new Local Plan.
CON073	REP375	TTLP			3	LCA SA 05	5. Land at Conington Road and Lewisham Road (Tesco) There is existing bus infrastructure on this site. The recognition that this needs to be relocated or retained as part of development is welcome. Any proposed plans relating to the bus infrastructure should be prepared in consultation with relevant TfL operational teams.	The Council notes and welcomes the support offered in relation to the new Local Plan Policy LCA SA 05 Land at Conington Road and Lewisham Road (Tesco). The new Local Plan Policy LCA SA 05 sets out development guidelines for the site allocations. These include the requirement to allow for the retention and/or re-provision of the bus stop and stand facility that are currently provided on this site. The Council considers the policy to be sound.	
CON073	REP376	TTLP			3	LCA SA 06	6. Thurston Road Bus Station TTLP is supportive of the use of this site for strategic infrastructure including as a work site/station box for the Bakerloo Line Extension. However, for the plan to be positively prepared there is an opportunity to explore future residential led development adjacent to or above the transport infrastructure that is coming forward on this site and this could be recognised in the site allocation. We also strongly recommend that the local plan identifies and commits to potential alternative sites which could	The Council notes and welcomes the supporting representation made in relation to the new Local Plan Policy LCA SA 06. The Council notes the additional comments provided by the respondent. Should unanticipated opportunities for growth arise, such as those provided by windfall sites, the new Local Plan includes appropriate suite of general planning policies that can inform the decision-taking process. The new Local Plan sets out the	No further actions required in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							accommodate a future bus stand within the locality of the Gateway. The existing bus services are relied upon and primarily used by Lewisham residents for travel to work, for shopping and for other needs in the borough and must be considered alongside promoting the delivery of the Bakerloo Line Extension.	<p>opportunities for taller, higher-intensity development under Policy QD4 Building Heights and Table 5.1 Tall Building Suitability Plan. This approach is sound. The Council is committed to working with development partners should deliverable and developable opportunities arise.</p> <p>The Council notes the suggestion that specific sites for bus stands be identified in the new Local Plan. The Council considers this to be unnecessarily prescriptive at this point in the development process – as such site options may prove inappropriate later in the implementation process. The new Local Plan and the parallel infrastructure planning process provides the Council and its infrastructure partners with appropriate mechanisms to identify and deliver such infrastructure in a dynamic fashion.</p>	
CON073	REP377	TTLP			3	LCA SA 18	18. Catford Island TfL has land ownership on Sangley Road which is now included within this site allocation. TTLP are supportive of this allocation and the proposed road improvement schemes coming forward in the area and are willing to work with applicants and the council to bring forward development on appropriate areas of the site.	The Council notes and welcomes the supporting representation made in relation to the new Local Plan Policy LCA SA 18.	No further actions required in relation to the new Local Plan.
CON073	REP378	TTLP			3	LNA 03	<p>North of the Borough TTLP have significant landholdings in this part of the borough which are suitable for being brought forward for a range of employment and residential use. Policy LNA3 Creative Enterprise Zone TTLP is supportive of this policy. TfL own significant operational rail land in the north of the borough area and portions of this land may be suitable for redevelopment for a mix of creative employment uses in line with this policy.</p> <p>Since responding to the call for sites consultation in 2018 and the issues and options consultation in 2021, TfL has identified a site in Silwood Triangle (please see site map in appendix 1). This site has draft designations as a Strategic Industrial Location as well as being within the creative enterprise zone and TfL is keen to work with the borough to explore providing industrial uses on this site.</p> <p>A further in the north of the borough, which has also been identified since the response to the 2018 call for sites and 2021 issues and options consultation, may be suitable for residential led development is Oldfield Grove (Please see the map in appendix 2). This site is currently operational land and</p>	<p>The Council notes and welcomes the supportive comments made in relation to the new Local Plan Policy LNA 03 Creative Enterprise Zone.</p> <p>The Council welcomes the confirmation that land identified by the respondent as the Silwood Triangle is part of the Surrey Canal Road SIL and has good prospects for the development and intensification of industrial, storage, transport, utilities, and other employment-type uses (Representation Annex 1).</p> <p>The Council notes the respondent's comments relating to a further site at Oldfield Grove.</p>	No further actions required in relation to the new Local Plan.

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							further feasibility work to understand the scope of the opportunity needs to be undertaken.		
CON073	REP379	TTLP			3	LEA SA 08	East of the Borough 8 Sainsbury Local and West of Grove Park Station TfL owns a bus stand within this site allocation. TTLP is supportive of the allocation in principal but agrees that any applicants should consult with Transport for London to investigate future options for the bus stand, including the continued operational function of either the existing, or re-provided, bus facility, which the site masterplan should address.	The Council notes and welcomes the supporting representation made in relation to the new Local Plan Policy LEA SA 08. The Council notes that the new Local Plan Policy LEA SA 08 supporting text wording identifies the requirement that development partners must consult with Transport for London to investigate options for the existing bus station, including retention or appropriate re-provision.	No further actions required in relation to the new Local Plan.
CON073	REP380	TTLP				General	Policies Map TTLP are supportive of the proposed changes to the policies map. Conclusion We hope that these representations are helpful but if you need any further information or would like to discuss any of the points raised in our representations, please do not hesitate to contact me. We look forward to being kept up to date with your programme going forwards.	The Council notes and welcomes the supporting representation made in relation to the new Local Plan policies map.	No further actions required in relation to the new Local Plan.
CON073	REP381	TTLP			5	Schedule 4	Appendix 1 The Silwood Triangle site (SE14 5RL) is part of the Surrey Canal Road SIL and has good prospects for the development and intensification of industrial, storage, transport, utilities and other employment-type uses. The triangular shaped site is located in between two Overground lines coming from Peckham and New Cross that bound the site to the west and east. The two lines converge into one line which continues north to Surrey Quays. A Network Rail line and the Gemeni Project business estate bound the site to the south. The site is currently being used primarily as a train depot (Deptford train depot) for stabling. To the south of the depot is a yard which is used for utility purposes in order to service the trainlines which surround the site. The site also comprises some vacant land north of the depot which is sparsely vegetated with some mature trees located along the eastern overground line.	The Council welcomes the confirmation that land identified by the respondent as the Silwood Triangle is part of the Surrey Canal Road SIL and has good prospects for the development and intensification of industrial, storage, transport, utilities, and other employment-type uses (Representation Annex 1).	No further actions required in relation to the new Local Plan.

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CON073	REP382	TTLP			3	LNA	<p>Appendix 2 The Oldfield Grove site (SE16 2NZ) is within the Lewisham, Catford and New Cross Opportunity Area and an established residential area, and has good prospects for housing development, providing that any impacts from existing noise and other nuisance-generating activities or uses on the adjacent SIL can be mitigated. The rectangular shaped site is located on the east side of Oldfield Grove, between the Silwood housing estate and the TfL overground line which travels north – south through Lewisham. The site is currently occupied by a two-storey building which is used as an infrastructure maintenance facility for the East London Line. This facility is likely to be relocated elsewhere in the borough. There is also a small yard to the south of the building which is used as storage for the maintenance of the railway and also comprises a substation and a tunnel which runs under the adjacent railway line. Access to the site is from Oldfield Grove.</p>	The Council notes the respondent's comments relating to a further site at Oldfield Grove.	No further actions required in relation to the new Local Plan.

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CON074	REP383	Environmen t Agency			2	GR	<p>London Borough of Lewisham Local Plan – Regulation 19 stage</p> <p>Thank you for consulting the Environment Agency on the new Lewisham Local Plan.</p> <p>The London Borough of Lewisham and Environment Agency are experienced in partnership working to deliver river restoration and an improved environment across the borough and along the river corridors such as at Cornmill Gardens, Deptford Creek, Lewisham town centre and Ladywell Fields. We are keen to continue to build on these successes and ensure new development delivers an improved environment and is designed and located to be resilient to climate change.</p> <p>The new Local Plan sets clear goals on continuing to deliver an improved environment and managing flood risk and environmental protection across the borough. We can see how our previous comments and feedback have been taken on board and have helped to inform the new Local Plan. We feel the new Local Plan is sound, legally compliant and has been produced in line with the Duty to Co-operate.</p> <p>We welcome the monitoring proposed to monitor green infrastructure improvements, environmental quality and pollution incidents across the borough to ensure new development is delivering environmental improvements and identify actions / measures if environmental quality is not improving.</p> <p>Lewisham is a unique urban environment with extremes ranging from restored and highly valued rivers and parks to</p>	<p>The Council thanks the Environment Agency for their continued partnership involvement in the on-going plan-making process. The Council notes and welcomes the Environment Agency's support for the new Local Plan's Spatial Strategy Policy OL1 and planning policies.</p> <p>The Council welcomes the continued partnership relationship with the Environment Agency in respect of meeting shared plan-making and decision-taking responsibilities.</p> <p>Where it is shown to be necessary the Council will work with its statutory partners, including the Environment Agency, to agree and submit Statements of Common Ground.</p>	<p>Ensure that the new Local Plan's supporting evidence is maintained and kept up to date.</p> <p>As suggested by the Environment Agency ensure that the <i>Plan for Water: our integrated plan for delivering clean and plentiful water</i> is included as part of the new Local Plan's supporting evidence base.</p> <p>If necessary, consider the preparation, agreement and submission of a Statement of Common Ground between the Environment Agency and the Council.</p>

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							<p>poor quality heavily urbanised and culverted rivers. We are keen to continue to work in partnership with you to ensure all new development maximises opportunities to “make space” for water and deliver environmental improvements for people and wildlife.</p> <p>Since the previous Local Plan consultation the new national Environmental Improvement Plan 2023 has been published which builds on the Government’s 25 year Environment Plan. We recommend adding this plan to the evidence base / sustainability appraisal as the new plan to protect and enhance the environment and deliver the Environment Act 2021.</p> <p>Environmental Improvement Plan (publishing.service.gov.uk) This new plan sets 10 Environmental goals and many of these are linked to the spatial planning process such as improving and adapting the urban environment to climate change, improving water quality, improving air quality, reducing pollution and moving towards a circular economy.</p> <ul style="list-style-type: none"> • Goal 1: Thriving plants and wildlife • Goal 2: Clean air • Goal 3: Clean and plentiful water • Goal 4: Managing exposure to chemicals and pesticides • Goal 5: Maximise our resources, minimise our waste • Goal 6: Using resources from nature sustainably • Goal 7: Mitigating and adapting to climate change • Goal 8: Reduced risk of harm from environmental hazards • Goal 9: Enhancing biosecurity • Goal 10: Enhanced beauty, heritage and engagement with natural environment <p>The delivery of the 25 Year plan and Environmental Improvement Plan will be monitored through Outcome Indicator Reporting which will be used to track delivery. Some of this reporting is ongoing such as Water Pollution incidents and some is still being developed. The data and environmental trends could inform your Local Plan delivery / reviews and the annual monitoring process.</p> <p>We also recommend adding the new Plan for Water to the evidence base which has been launched recently and aims to deliver an integrated approach for clean and plentiful water. Plan for Water: our integrated plan for delivering clean and plentiful water - GOV.UK (www.gov.uk)</p>		

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							<p>Key actions include:</p> <ul style="list-style-type: none"> • delivering catchment action plans backed up with new funding to improve all water bodies in England • more funding for catchment groups and catchment-scale partnerships that coordinate action and investment where the river needs it most <p>We support the following Local Plan strategic objectives and are keen to work with you to deliver these through ongoing partnership working and a positive planning service and early pre application engagement.</p> <ul style="list-style-type: none"> • D - A greener borough • E - Responding to the climate emergency • G - Healthy and safe communities • H - Securing timely delivery of infrastructure <p>We welcome and support the following new policies which aim to deliver sustainable growth and deliver environmental protection and enhancement.</p> <p>Green Infrastructure</p> <ul style="list-style-type: none"> • GR1 Green infrastructure and Lewisham's Green Grid • GR2 Open space • GR3 Biodiversity and access to nature • GR4 Lewisham Links • GR5 Urban greening and trees • GR6 Food growing • GR7 Geodiversity <p>Sustainable Design and Infrastructure</p> <ul style="list-style-type: none"> • SD1 Responding to the climate emergency • SD2 Sustainable design and retrofitting • SD3 Minimising greenhouse gas emissions • SD4 Energy infrastructure • SD5 Managing heat risk • SD6 Improving air quality • SD7 Minimising and managing flood risk • SD8 Sustainable drainage • SD9 Lewisham's waterways • SD10 Water supply and wastewater • SD11 Ground conditions • SD12 Reducing and sustainably managing waste • SD13 Design to support the circular economy 		

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							<p>Delivery and monitoring site: Characterisation Study workshop</p> <ul style="list-style-type: none"> • DM1 - Working with stakeholders to deliver the Local Plan • DM2 - Infrastructure funding and planning obligations • DM7 - Monitoring and review <p>We recommend the evidence base and is kept up to date for example the Strategic Flood Risk Assessment (SFRA) should be regularly reviewed when new climate change allowances are issued, new flood models and updated flood maps, new groundwater maps and water quality information is released. We are keen to share environmental evidence and data to inform Local Plan policies and planning decisions and data is available to download using this link Defra Data Services Platform</p> <p>We look forward to continuing to work in partnership with you to ensure new development protects and enhances the environment. I hope our response is clear, if you have any questions or require more information please let me know.</p>		
CON075	REP384	Thames Water			3	LCA SA 08	<p>Water response: On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 08 100-114 Loampit Vale.</p> <p>The Council notes that the new Local Plan Policy LCA SA 08 states that <i>“Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. New connections into the Bell Green trunk sewer will not be allowed.”</i></p> <p>The Council considers this a sound approach.</p>	No further action necessary in relation to the new Local Plan.
CON075	REP385	Thames Water			3	LCA SA 09	<p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It</p>	The Council notes the comments made in relation to the new Local Plan Policy LCA SA 09 Silver Road and Axion House.	The Council to consider an amended wording at Paragraph 14.63 3) –

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							<p>is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	<p>The Council notes that the new Local Plan Policy LCA SA 09 states that <i>“Applicants should work in partnership with Thames Water to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied. Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into the Ravensbourne trunk sewer will not be allowed.”</i></p> <p>The Council considers the policy to be sound. However, the Council could consider an addition to the policy wording, through the modifications process, to further strengthen the wording if that were considered necessary for the purposes of soundness.</p>	<p><i>“Applicants should must work in partnership with Thames Water to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied. This will include the preparation and agreement of housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into the Ravensbourne trunk sewer will not be allowed.”</i></p>
CON075	REP386	Thames Water			3	LCA SA 17	<p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Additional comments:</p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 17 Catford Shopping Centre and Milford Towers.</p> <p>The Council notes that the new Local Plan Policy LCA SA 17 states that <i>“Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Splitting flows across various connection points may be required as the existing network consists of small diameter pipes. An existing drainage plan should be submitted to aid in assessing pipe capacity.”</i></p> <p>The Council considers this a sound approach.</p>	<p>No further action necessary in relation to the new Local Plan.</p>

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							Waste: As the development is located on a Brownfield site there may be existing sewers or rising mains crossing the site. Where these sewers or rising mains are to become redundant or have to be diverted the full cost of administering and undertaking the works shall be financed by the developer.		
CON075	REP387	Thames Water			3	LCA SA 18	<p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 18 Catford Island.</p> <p>The Council notes that the new Local Plan Policy LCA SA 18 states that <i>“Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. New connections into the Lewisham trunk sewer will not be allowed.”</i></p> <p>The Council considers this a sound approach.</p>	No further action necessary in relation to the new Local Plan.
CON075	REP388	Thames Water			3	LCA SA 14	<p>Water response: On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 14 Driving Test Centre, Nightingale Grove.</p> <p>The Council notes that the new Local Plan Policy LCA SA 14 states that <i>“Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered</i></p>	No further action necessary in relation to the new Local Plan.

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							Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	<i>ahead of the site being occupied through a housing phasing plan.”</i> The Council considers this a sound approach.	
CON075	REP389	Thames Water			3	LCA SA 12	<p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 12 Ladywell Play Tower.</p> <p>The Council notes that the new Local Plan Policy LCA SA 12 states that “<i>Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable, ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan and minimise the risk of flooding or surcharging when emptying swimming pools into the public sewer.</i>”</p> <p>The Council considers this a sound approach.</p>	No further action necessary in relation to the new Local Plan.
CON075	REP390	Thames Water			3	LCA SA 05	<p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.</p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 05 Land at Conington Road and Lewsiham Road (Tesco).</p> <p>The Council notes that the new Local Plan Policy LCA SA 05 states that “<i>Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing</i></p>	No further action necessary in relation to the new Local Plan.

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							<p>Waste response:</p> <p>The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.</p>	<p><i>plan. Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into the trunk sewer running south to north through the site will not be allowed."</i></p> <p>The Council considers this a sound approach.</p>	
CON075	REP391	Thames Water			3	LCA SA 10	<p>Water response:</p> <p>On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Waste response:</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Additional comments:</p> <p>These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 10 House on the Hill at Slaithewaite Road.</p> <p>The Council notes that the new Local Plan Policy LCA SA 10 states that <i>"Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water and divert existing sewers where applicable."</i></p> <p>The Council considers this a sound approach.</p>	No further action necessary in relation to the new Local Plan.
CON075	REP392	Thames Water			3	LCA SA 03	<p>Water response:</p> <p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does</p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 03 Land at Engate Street.</p> <p>The Council notes that the new Local Plan Policy LCA SA 05 states that <i>"Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where</i></p>	No further action necessary in relation to the new Local Plan.

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							<p>not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.</p> <p>Waste response: The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.</p>	<p><i>applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network."</i></p> <p>The Council considers this a sound approach.</p>	
CON075	REP393	Thames Water			3	LCA SA 15	<p>Water response: On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 15 Land at Nightingale Grove and Maythorne Cottage.	No further action necessary in relation to the new Local Plan.
CON075	REP394	Thames Water			3	LCA SA 16	<p>Water response On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Waste response</p>	The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 16 Land at Rushey Green and Bradgate Road (Aldi).	No further action necessary in relation to the new Local Plan.

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							<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Additional comments; These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>		
CON075	REP395	Thames Water			3	LCA SA 19	<p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Additional response: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 19 Laurence House and Civic Centre.</p> <p>The Council notes that the new Local Plan Policy LCA SA 19 states that <i>“Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. New connections into the trunk sewer will not be allowed.”</i></p> <p>The Council considers this a sound approach.</p>	No further action necessary in relation to the new Local Plan.
CON075	REP396	Thames Water			3	LCA SA 01	<p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation</p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 01 Lewisham Gateway.</p> <p>The Council notes that the new Local Plan Policy LCA SA 01 states that <i>“Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to</i></p>	<p>The Council to consider an amended wording at Paragraph 14.24 6) –</p> <p><i>“Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface</i></p>

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							<p>of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Officer response: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	<p><i>mitigate against flood risk...Applicants should work in partnership with Thames Water. Given the adjacent watercourse, surface water should not be discharged to the public network."</i></p> <p>The Council could consider an addition to the policy wording, through the modifications process, to further strengthen the wording if that were considered necessary for the purposes of soundness.</p>	<p><i>water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network."</i></p>
CON075	REP397	Thames Water			3	LSA SA 07	<p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LSA 07 Lidl, Southend Lane.</p> <p>The Council notes that the new Local Plan Policy LSA SA 07 states that <i>"Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan."</i></p> <p>The Council considers this a sound approach.</p>	No further action necessary in relation to the new Local Plan.
CON075	REP398	Thames Water			3	LCA SA 02	<p>Water Response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning</p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LSA 02 Bell Green Retail Park.</p>	No further action necessary in relation to the new Local Plan.

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							<p>Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.</p> <p>Waste response: The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.</p>	<p>The Council notes that the new Local Plan Policy LCA SA 02 states that <i>“Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into trunk sewers will not be allowed.”</i></p> <p>The Council considers this a sound approach.</p>	
CON075	REP399	Thames Water			3	LCA SA 22	<p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.</p> <p>Waste response: On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 22 Ravensbourne Retail Park.</p> <p>The Council notes that the new Local Plan Policy LCA SA 22 states that <i>“Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network.”</i></p> <p>The Council considers this a sound approach.</p>	No further action necessary in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.		
CON075	REP400	Thames Water			3	LCA SA 06	<p>Water response: The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the water supply network infrastructure. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.</p> <p>Waste response: The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 06.</p> <p>The Council highlights that the policy objective is to safeguard a piece of strategically important transport infrastructure – an open-air bus station (in the immediate and long term) and an area of surface interest for the delivery of the proposed Bakerloo Line Extension (in the medium term).</p> <p>The Bakerloo Line Extension is a strategic transport infrastructure improvement scheme that is being proposed and led by Transport for London. The Council supports and partners the proposal. It is anticipated that all relevant infrastructure partners, including Thames Water, will be actively involved in the delivery of the proposed scheme. It is anticipated that their level of involvement will progressively increase as the proposal gains momentum and secures funding. The Council considers the approach taken by the new Local Plan to be sound.</p>	No further action necessary in relation to the new Local Plan.
CON075	REP401	Thames Water			3	LCA SA 21	<p>Water response: The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment.</p> <p>Waste response:</p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 21 Wickes and Halfords, Catford Road.</p> <p>The Council notes that the new Local Plan Policy LCA SA 21 states that “<i>Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse,</i></p>	No further action necessary in relation to the new Local Plan.

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							<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p>Additional comments: These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.</p>	<p><i>surface water should not be discharged to the public network. New connections into the trunk sewer on Catford Hill will not be allowed. There are opportunities to daylight the Ravensbourne which is culverted on this site and expand the surface water network."</i></p> <p>The Council considers this a sound approach.</p>	
CON075	REP402	Thames Water			2	General	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <p>The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.</p> <p>To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.</p> <p>Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p>	<p>The Council notes and welcomes the broadly supportive overarching comments made by Thames Water in relation to the new Local Plan.</p> <p>The Council fully acknowledges the importance of working positively in partnership with infrastructure partners in delivering the necessary investment required to support planned-for growth.</p> <p>The Council welcomes Thames Water's suggested amendments to the new Local Plan's policies and supporting text. The Council will consider these suggestions with the aim of introducing any amendments, should they be necessary to secure the soundness of the new Local Plan, through the modifications process.</p> <p>Where it is shown to be necessary the Council will work with its infrastructure partners, including Thames Water, to agree and submit Statements of Common Ground.</p>	<p>Consider the need and if necessary, prepare a Statement of Common Ground with Thames Water. This will agree the actions required to resolve their comments made under Regulation 19.</p>

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							<p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.</p> <p>Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.</p>		
CON075	REP403	Thames Water			2	SD 10	<p>We support Policy SD10 as it is largely in line with our previous representations.</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.</p> <p>Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure.</p> <p>Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater..."</p> <p>Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure..."</p> <p>Paragraph 26 of the revised NPPF goes on to state: "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of</p>	<p>The Council notes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy SD 10 Water supply and wastewater.</p> <p>The Council notes and welcomes the statement that Thames Water wish to co-operate and maintain a good working relationship with local planning authorities – providing necessary support for the provision of water supply and sewerage/wastewater treatment infrastructure. The Council fully acknowledges the support provided by its infrastructure partners in delivering planned-for growth.</p> <p>The Council notes the clarification that Thames Water report flood incidents and does not itself monitor flood events. In response the Council can consider introducing an amendment to the supporting text as a minor modification.</p> <p>The Council notes the comments made in relation to the possible impact of growth on water and wastewater demand across the Borough. Within this context, the comments made in relation to water efficiency are recognised. The Council can consider an amendment to the wording of the supporting text set out under Paragraph 11.68.</p>	<p>The council to consider introducing a minor modification to the supporting text under Paragraph 11.63 to reflect the factual position –</p> <p>Paragraph 11.63 <i>"Thames Water record reported sewer flooding incidents by postcode area and this information should be referred."</i></p> <p>The Council to consider additional wording to the supporting text set out under Paragraph 11.68 through the modifications process -</p> <p>Paragraph 11.68 <i>"New residential development must meet the London Plan standard for mains water consumption, which reflects the Optional Requirement set out in Part G of the Building Regulations. All new residential developments (including replacement dwellings) will meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, using the 'Fittings Approach' in table 2.2 as set out in Building Regulations part G2. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met. Major non-residential development must meet BREEAM excellent standard for the</i></p>

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							<p>a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>Policy SI5 of the new London Plan relates to water and wastewater infrastructure and supports the provision of such infrastructure to service development.</p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. We therefore support Policy SD10 in this respect.</p> <p>In relation to supporting paragraph 11.63 – it should be clarified that Thames Water record ‘reported’ flooding incidents. Therefore, if they aren’t reported to us we don’t necessarily know.</p> <p>Water Efficiency</p> <p>We also support Part D of Policy SD10 which sets out that planning conditions will be applied to ensure that water efficiency standards are met.</p> <p>The Environment Agency has designated the Thames Water region to be an area of “serious water stress” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. On average our customers each use 30% more water than they did 30 years ago. Therefore water efficiency measures employed in new development are an important tool to help us sustain water supplies for the long term.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water.</p>		<p><i>‘Wat 01’ water category, to achieve at least a 12.5% improvement over defined baseline performance standard. In addition, major developments and high or intense water use developments (such as hotels) should include a grey water and rain water harvesting system, and applications must provide robust justification where this is not considered feasible. Planning conditions will be used to ensure water efficiency targets are met.”</i></p>

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							<p>Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.</p> <p>Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link: https://www.thameswater.co.uk/Be-water-smart</p> <p>It is our understanding that the water efficiency standards of 110 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations. We therefore support Policy SD10 D in referring the use of planning conditions. However, clarification should be provided in relation to the preferred 'Fittings Approach'.</p> <p>Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.</p> <p>We therefore consider that paragraph 11.68 should be amended to refer to state:</p> <p>".....All new residential developments (including replacement dwellings) will meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, using the 'Fittings Approach' in table 2.2 as set out in Building Regulations part G2. Planning conditions will be applied to new</p>		

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							<p>residential development to ensure that the water efficiency standards are met.....”</p> <p>Paragraph 11.63 should be amended to clarify that Thames Water only record ‘reported’ flooding incidents.</p> <p><i>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? NO</i></p>		
CON075	REP404	Thames Water			2	SD 08	<p>We support Policy SD8 in principle.</p> <p>In regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy set out in the London Plan. It is important to reduce the quantity of surface water entering the sewerage system in order to maximize the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: <i>“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</i></p>	<p>The Council notes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy SD 08 Sustainable Drainage.</p> <p>The Council acknowledges that securing appropriate sustainable drainage provision forms a key component towards managing the impact of future growth across the Borough. The Council remains committed to facilitating the necessary partnership relationships that must exist between development industry and infrastructure delivery partners, and the planning authority. To that end, the Council will consider the suggested amendment to the new Local Plan Policy SD 08 Sustainable Drainage through the modifications process.</p>	<p>The Council to consider the following addition to the new Local Plan Policy SD 08 Sustainable Drainage through the modifications process –</p> <p>SD8 Sustainable Drainage</p> <p><i>“G Development industry partners are responsible for making proper provision for surface water drainage to ground, water courses or surface water sewer. Proposals for new provision will not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</i></p>
CON076	REP405	London Borough of Bexley			0	General	<p>Thank you for the opportunity to comment on the Lewisham Regulation 19 Draft Local Plan. London Borough of Bexley (the Council) considers that the draft plan is a comprehensive, considered and carefully evidenced policy document and therefore supports the broad objectives of the plan.</p>	<p>The Council welcomes the support provided by the London Borough of Bexley. The Council remains committed to working on strategic planning issues with its partners in neighbouring local planning authorities. Within this context the Borough notes the suggestion that explicit</p>	<p>The Council will consider modifications to supporting text at Paragraphs 3.18 – 3.21 to make clear reference to the wider partnership relationships critical to the delivery of strategic infrastructure improvements.</p>

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							In general, the Council would supports explicit references to partnership working with neighbouring planning authorities across the London sub-region particularly with strategic matters likely to cross administrative boundaries, including transport, sustainable waste management, green infrastructure including the South East London Green Chain, and mitigating climate change (including flood risk management). We look forward to continued partnership working with London Borough of Lewisham. Comments on relevant parts of the draft plan of specific interest to the Council are provided below.	reference be made to such partnership working arrangements within the new Local Plan itself. Although the Council does not consider this an essential matter of soundness, it does acknowledge that it could provide the reader with an improved understanding of the wider partnership relationships that are critical to the delivery of new infrastructure networks.	
CON076	REP406	London Borough of Bexley			2	HO 01	Housing matters It is noted that draft policy HO1 aims to exceed the London Plan minimum ten-year target of 16,670 net housing completions over the period 2019/20 to 2028/29, with no stated intention to seek that other boroughs accommodate any unmet housing need.	The Council welcomes the support to new Local Plan Policy Ho 01 provided by the London Borough of Bexley.	No further action required in relation to the new Local Plan.
CON076	REP407	London Borough of Bexley			2	HO 10	The Council welcomes the fact that a new site allocation policy relating to gypsy and traveller accommodation has been included as part of the draft plan, which seeks to meet the current identified need in full.	The Council welcomes the support to new Local Plan Policy HO 10 provided by the London Borough of Bexley.	No further action required in relation to the new Local Plan.
CON076	REP408	London Borough of Bexley			2	EC 02	Employment land matters The Council welcomes the requirements set out within draft policy EC2 that seek to ensure the economic function of Lewisham’s Strategic Industrial Locations is safeguarded for industrial uses and will not be compromised by new residential or other non-industrial development.	The Council welcomes the support to new Local Plan Policy EC 02 provided by the London Borough of Bexley.	No further action required in relation to the new Local Plan.
CON076	REP409	London Borough of Bexley			2	SD 12	Waste matters The Council welcomes that draft policy SD12 sets out Lewisham’s intention to continue to work with other local authorities within the South East London Joint Waste Planning Group including Bexley. Lewisham should consider, and if appropriate, add the term ‘SELJWPG’ to its list of abbreviations in Table 20.1.	The Council welcomes the support to new Local Plan Policy SD12 provided by the London Borough of Bexley. The Council notes the suggested addition of the acronym “SELJWPG” – South East London Joint Waste Planning Group to Table 20.1.	It is suggested that the Council consider the addition of the acronym “SELJWPG” – South East London Joint Waste Planning Group to Table 20.1 as a modification.
CON077	REP410	City of Westminster			2	SD 12	The City of Westminster would like to make a comment related to Policy SD12 Reducing and sustainably managing waste. Part B of this policy makes reference to how Lewisham will work in partnership with stakeholders including the South East London Joint Waste Planning Group (SELJWPG). The supporting text to the policy, paragraph 11.77 explains that the South East London Joint Technical Paper has been prepared by	The Council welcomes and notes the comments raised by the City of Westminster. This is not considered to be a matter of soundness for the new Local Plan. Nevertheless, in the interests of maintaining a positive partnership relationship, a suitable modification to Paragraph 11.77 could be considered.	Consider a modification to the new Local Plan at supporting text Paragraph 11.77 to include an appropriate factual reference to the City of Westminster and how it interacts with the wider South East London Joint Waste Planning Group. The wording in the

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							<p>this group and provides details on pooled waste apportionments.</p> <p>There are existing close links between the City of Westminster and other members of the SELJWPG, the London Borough of Bexley has agreed to take Westminster's London Plan Waste appointment, Westminster residual waste is managed at SELCHP in Lewisham and our recyclables are sorted at the Integrated Waste Management Facility in Southwark. The South East London Joint Waste Technical Paper makes reference to the relationship the City of Westminster has with SWLJWPG.</p> <p>Although Westminster does not have any Strategic Industrial Locations, Locally Significant Industrial Sites or wharves for new waste facilities and there are no suitable or deliverable sites in Westminster for new waste facilities, the City of Westminster will contribute to joint work on the waste evidence base to the benefit of all members of the SELJWPG and actively co-operate the collectively work towards meeting the London Plan requirement for net self-sufficiency for waste. Westminster also imports agricultural waste from other boroughs to be composted in the city's royal parks which continue to be important, albeit non-strategic contributor to how this waste stream is managed in London.</p> <p>Westminster has made a commitment to seek to join a waster planning group as part of its most recent local plan examination and given these close connections and the proximity of Westminster to other members of SELJWPG it makes geographical and logistical sense for Westminster to join. Westminster City Council made a formal request in writing ot he Chair of SELJWPG in 2021 to accept the City of Westminster as an additional member of the group. No response has been agreed by SLJWPG and the City of Westminster would like to use the consultation to Lewisham's Local Plan as an opportunity to request again that membership be considered and granted.</p> <p>I trust the above reflects our hared aspiration on close co-operation on waste management and look forward to receiving your response to this request.</p>		supporting text of the new Bexley Local Plan – at Paragraph 6.83, may provide a model for the modification.
CON078	REP411	Network Rail			2	TR	<p>NETWORK RAIL CONSULTATION RESPONSE: LEWISHAM LOCAL PLAN (2020 – 2040) CONSULTATION (REGULATION 19)</p> <p>Thank you for consulting Network Rail on the above consultation. Having consulted internally, we have the following comments.</p>	<p>The Council notes the general comments made by Network Rail in relation to the new Local Plan.</p> <p>The Council highlights that it has sought to positively engage with all relevant</p>	No further action required in relation to the new Local Plan.

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							<p>Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, Network Rail is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway.</p> <p>The railway is bound to feel the impact of the Council's regeneration plans for Lewisham. While we do not object to development in principle, as part of Network Rail's license to operate and manage Britain's railway infrastructure, we have an obligation to ensure rail travel continues to be promoted as an attractive form of sustainable transport. As a publicly funded company, Network Rail has responsibilities to spend public funds efficiently which consequently means we do not have the funds available to mitigate the impact of third-party development. Consequently, Network Rail expect any mitigation required to be funded at no expense to Network Rail.</p>	infrastructure partners during the plan-making process. Their continued involvement through examination, adoption and implementation is critical to securing successful place-making.	
CON078	REP412	Network Rail			3	LSA 01	<p>Train Stations Where a significant amount of rail trips are generated by a third-party development, Network Rail expect that the development provides a contribution to mitigate the additional usage, ensuring that the rail network can continue to operate effectively.</p> <p>The contributions will encourage greater use of public transport by enhancing the rail experience for passengers. Please note that we are still in the process of engaging with the train operating companies, Southern Railway and Southeastern Railway, in relation to the current conditions of rail stations within the Council's boundary and the mitigation methods that would be required.</p> <p>Bellingham station - in the first instance, we have identified the requirement for step-free access in Bellingham Station – an issue that is likely to be exacerbated by the proposed redevelopment of the retail park on Bromley Road.</p> <p>It is noted that provision for access improvements to the station approach of Bellingham has been included in policy LSA1, however this should be strengthened so that access-for-all improvements are vital.</p>	<p>The Council notes the comments made by Network Rail in relation to additional investment required to its infrastructure to support new growth. The Council considers the existing wording of new Local Plan Policy LSA 01 to remain sound.</p> <p>The Council highlights that it has sought to positively engage with all relevant infrastructure partners during the plan-making process. Their continued involvement through examination, adoption and implementation is critical to securing successful place-making.</p> <p>Whilst the Council continues to be supportive of investment and the optimisation of existing sustainable transport networks the detail behind the specific improvements relating to Bellingham Station are unclear. In particular, the timeframe for delivery of step-free access to the Station is unknown and unspecified.</p> <p>Network Rail are reminded of the need to submit investment opportunities to the Council for inclusion in the Lewisham</p>	<p>Seek further information on the proposals from Network Rail. Establish the timeframe for delivery and the relationship with planned-for growth across the Lewisham South Area.</p> <p>Establish whether the proposed step-free access improvements to Bellingham Station have previously been considered by the Lewisham IDP and the Local Plan Viability Assessment. Ensure that this and other new railway station access improvements are considered by the Viability Assessment update.</p>

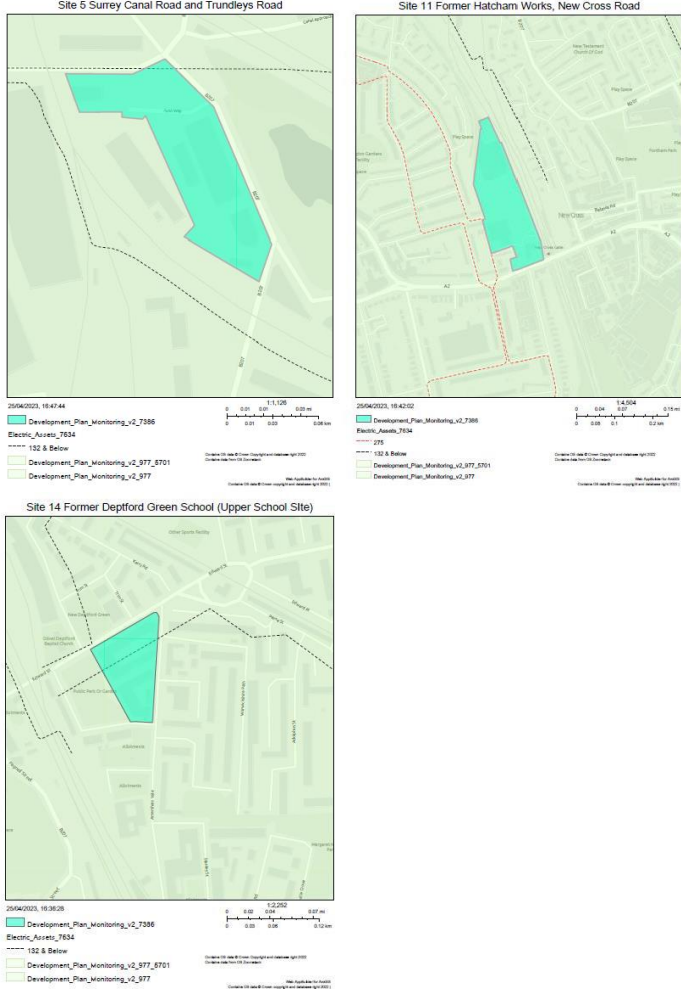
Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
								Infrastructure Delivery Plan. This provides an appropriate framework for the Council to fully consider and prioritise infrastructure investment in its plan-making, decision-taking, and allocation of developer contributions.	
CON078	REP413	Network Rail			3	LSA SA 06	Worsley Bridge Road Locally Significant Industrial Site – enhancements towards the station approach at Lower Sydenham and the delivery of a cycleway are supported. We will be able to provide further, more specific detail regarding the nature of enhancements in due course.	<p>The Council welcomes the broad support to new Local Plan Policy LSA SA 06.</p> <p>Network Rail are reminded of the need to submit investment opportunities to the Council for inclusion in the Lewisham Infrastructure Delivery Plan. This provides an appropriate framework for the Council to fully consider and prioritise infrastructure investment in its plan-making, decision-taking, and allocation of developer contributions.</p>	Subject to Network Rail providing additional detail to the local plan-making and IDP process ensure that this and other new railway station access improvements are considered by the Viability Assessment update.
CON078	REP414	Network Rail			3	LNA SA 09	Surrey Canal Triangle Mixed-use Employment Location – the proximity of this development location is a concern for South Bermondsey station. Upgrades towards accessibility should be ensured, including provision of access for all lifts. Other sites also interact with South Bermondsey, particularly so if Surrey Canal Road is delayed or delivered after the developments.	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 09.</p> <p>The new Local Plan's Spatial Strategy set out under Policy OL1 identifies the Regeneration Nodes, Growth Nodes and Growth Corridors where future development will be focused. These are identified under Figure 3.3. These sustainable locations have been identified based on a combination of factors – including their accessibility to existing travel networks and their capacity to accommodate growth.</p> <p>The new Local Plan Policy LNA SA 09 Surrey Canal Triangle site allocation is a large previously developed site covering an area of more than 10 hectares. It has good access to a range of existing sustainable travel networks – including the railway, and dedicated pedestrian and cycle routes. It has capacity to accommodate high density residential and commercial development. It is a highly appropriate and sustainable location for growth.</p> <p>The new Local Plan Policy LNA SA 09 makes provision for new transport infrastructure</p>	Subject to Network Rail providing additional detail to the local plan-making and IDP process ensure that this and other new railway station access improvements are considered by the Viability Assessment update.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
								within the site, including a new Overground station at Surrey Canal Road and an accompanying walking and cycle bridge, in partnership with TFL and infrastructure providers. The site allocation is considered sound.	
CON078	REP415	Network Rail			3	LNA SA 11	Former Hatcham Works, New Cross Road – Network Rail are keen to work with Lewisham and TFL on aspirations for enhancing New Cross Gate station. We have previously suggested potential for oversight development.	<p>The Council notes and welcomes the comments made in relation to the new Local Plan Policy LNA SA 11 Former Hatcham Works, New Cross Road.</p> <p>The Council notes that the new Local Plan Policy LNA SA 11 states that – <i>“Development must be delivered in accordance with a masterplan that addresses the site’s relationship with New Cross Gate station and the Goodwood Road / New Cross Road site, and any requirements associated with the transport network, taking into account the New Cross Area Framework SPD. The masterplan should consider co-location, phasing, and balance of uses across the site, in line with Policy DM3 (Masterplan and comprehensive development).”</i></p> <p>The Council considers that the policy is sound and provides an opportunity for working with infrastructure partners to secure their longer-term aspirations for investment in their networks.</p> <p>The Council acknowledges that existing transport network hubs, such as railway stations, may provide opportunities for accommodating development in the future. This is something that could be explored through the master planning process set out above, or alternatively through the next iteration of the local plan. Additional major housing site allocations are not necessary to secure the soundness of the new Local Plan.</p>	No further action required in relation to the new Local Plan.
CON078	REP416	Network Rail			3	LSA 03	Bell Green area – land should be safeguarded to support the delivery of strategic infrastructure, including where required for the Bakerloo line extension. Network Rail have already received information requests regarding Bell Green and,	The Council notes the comments made in relation to the new Local Plan Policy LSA 03 Bell Green and Lower Sydenham.	No further action required in relation to the new Local Plan.

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							alongside TFL, should be consulted on development going forward.	<p>The Council notes that the new Local Plan Policy LSA 03 states that “...<i>development will not prejudice the delivery of the Bakerloo line extension, taking into account any Ministerial Safeguarding Directions and Mayor of London / Transport for London infrastructure requirements and/or feasibility studies associated with BLE Phase 2, with reference to Policy TR2 (Bakerloo line extension);</i>”</p> <p>It is also noted that the Lewisham South Area site allocation policies refer to this requirement where relevant. The Council considers this approach to this matter sound.</p>	
CON078	REP417	Network Rail			3	LNA	North of Lewisham - Regarding the regeneration plans of the North of Lewisham, the Council should be aware that there are still no firm dates for the opening of Surrey Canal Road Station. This could lead to potential delays that part of the Borough, as well unexpected pressure on South Bermondsey station, which is a concern.	<p>The Council notes the comments made in relation to the Lewisham North Area, specifically in relation the possible impact of delayed opening of the new railway station at Surrey Canal Road.</p> <p>The Council does not consider this to be a matter that could impede the Borough’s housing land supply trajectory. For that reason, the Council maintains that the new Local Plan is sound.</p>	No further action required in relation to the new Local Plan.
CON078	REP418	Network Rail			2	TR 01	<p>TR1 ‘Metroisation of London Overground services’ – is the Council referring to the metroisation of Southeastern services, rather than London Overground?</p> <p>The Council should also consider there are fewer services running than before, the first steps to metroisation would therefore be restoration and subsequent increase of current frequencies, before looking to enhance in the short term.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy TR 01 Sustainable transport and movement.</p> <p>The Council notes the question raised in respect of the proposed metroisation improvements. Within this context the reference to metroisation is to proposals by Transport For London set out in their “Strategic Case for Metroisation in South and South east London”. This seeks to transform the suburban rail network within and just beyond the southern London boundary into a single, integrated network. The transformation is envisaged to take place incrementally to secure a range of improvements for passengers, to services and the network. As with other strategic transport network improvements the scope of investment may extend beyond</p>	No further action required in relation to the new Local Plan.

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								the normal 15 year plan period, nevertheless the Council considers that the Plan remains sound.	
CON078	REP419	Network Rail			2	TR 02	TR2 Bakerloo Line Extension – this features throughout the plan as a key enabler of high density development, which Network Rail supports as it releases significant capacity of the Southeastern and Thameslink network.	The Council notes and welcomes the support offered by Network Rail in relation to the new Local Plan Policy TR 02 Bakerloo Line Extension. Where it is shown to be necessary the Council will work with its infrastructure partners, including Network Rail, to agree and submit Statements of Common Ground.	No further action required in relation to the new Local Plan. If necessary, prepare, agree, and submit a Statement of Common Ground between Network Rail and the council. This should set out how the two partners have worked together through the plan-making process on shared objectives.
CON079	REP420	Avison Young OBO National Grid			0	General	We wrote to you with regards to the recent consultation as detailed above in respect of our client National Grid. Our representation included one or more proposed site allocations which conflict with National Grid assets. Please see the attached files for the original representation. Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance. We would welcome a brief phone call to clarify National Grid's rights in relation to their existing assets and the implications of allocating sites without making these clear. We would be grateful if you would confirm that our representation has been received and the identified issues will be acknowledged in future iterations of the Development Plan Document (e.g. specific reference to National Grid assets in site constraints/parameters and requirement that these remain in-situ). Could you confirm who would be best placed to speak to in relation to this?	The Council notes and welcomes the comments made both in relation to the new Local Plan and the respondent's potential operational requirements during the implementation of development.	No further action required in relation to the new Local Plan. Contact National Grid and discuss their involvement as a participant and infrastructure partner through the plan-making/ examination process. Ensure that the National Grid's requirements are conveyed to the wider Planning Service and other services across the Council accordingly.
CON079	REP421	Avison Young OBO National Grid			3	LNA	National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Grid Electricity Transmission National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity	The Council notes and welcomes the comments made both in relation to the new Local Plan and the respondent's potential operational requirements during the implementation of development.	No further action required in relation to the new Local Plan. Contact National Grid and discuss their involvement as a participant and infrastructure partner through the plan-making/ examination process. Ensure that the National Grid's requirements are conveyed to the wider Planning Service and other

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							<p>distribution network operators, so it can reach homes and businesses.</p> <p>National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.</p> <p>National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid’s core regulated businesses. Please also consult with NGV separately from NGET.</p> <p>Proposed development sites crossed or in close proximity to NGET assets:</p> <p>Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.</p> <table><thead><tr><th>Development Plan Document Site Reference</th><th>Asset Description</th></tr></thead><tbody><tr><td>Lewisham’s North Area – Site Allocation 5 – Surrey Canal Road and Trundleys Road Locally Significant Industrial Site</td><td>0Kv Underground Cable route: LPT2 Planned</td></tr><tr><td>Lewisham’s North Area – Site Allocation 11 – Former</td><td>275Kv Underground Cable route: HURST - NEW CROSS 1</td></tr></tbody></table> <table><tbody><tr><td>Hatcham Works, New Cross Road</td><td></td></tr><tr><td>Lewisham’s North Area – Site Allocation 14 – Former Deptford Green School</td><td>0Kv Underground Cable route: Deptford BR</td></tr></tbody></table> <p>Further Advice</p> <p>NGET is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect NGET’s assets. We would be grateful if you could check that our details as shown below are included on your consultation database.</p>	Development Plan Document Site Reference	Asset Description	Lewisham’s North Area – Site Allocation 5 – Surrey Canal Road and Trundleys Road Locally Significant Industrial Site	0Kv Underground Cable route: LPT2 Planned	Lewisham’s North Area – Site Allocation 11 – Former	275Kv Underground Cable route: HURST - NEW CROSS 1	Hatcham Works, New Cross Road		Lewisham’s North Area – Site Allocation 14 – Former Deptford Green School	0Kv Underground Cable route: Deptford BR		services across the Council accordingly.
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CON080	REP422	Metropolita n Police			4	DM 02	<p>Policy DM2 (Infrastructure funding and planning obligations) refers to community and social infrastructure and also community safety measures as being areas where section 106 contributions will be sought from developments. However, it does not explicitly refer to seeking contributions from major development to mitigate the impact of crime and the need that arises for additional policing infrastructure.</p> <p>Background The draft Local Plan refers to the population of Lewisham’s population growing by roughly 20% by 2040. It also refers to the London Plan target of delivering 1,667 net units a year. There will also be a corresponding growth in commercial acuity and development. This is a significant amount of development that will have knock on implications for crime rates and policing infrastructure.</p> <p>Policy Recognition Sought</p>	<p>The Council notes the comments made by the respondent in relation to supporting planned-for growth through investment in supporting infrastructure, which in this case is understood to relate to policing.</p> <p>The Council also notes that the representation refers to various challenges prepared by other police forces in relation to the allocation and distribution Section 106 received from new developments (as developer contributions). It is noted that these challenges identified a wider range of capital investment but did not extend the definition (of assets) to include police personnel (either officers or civilian employees).</p>	No further action required in respect of the new Local Plan.

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							<p>MPS is seeking recognition within the proposed Local Plan that new dwellings and other development increases the need for policing, leading to a legitimate infrastructure requirement that should be accounted for through section 106 contributions. We believe that it is appropriate that this should be set out clearly within the Local Plan, as opposed to any other documents. This is because this document establishes the need for and strategy to deliver new dwellings and other growth that gives rise to the requirement.</p> <p>Relevant Appeal and Court Cases It is widely accepted and documented that policing infrastructure represents a legitimate item for inclusion within a Section 106 agreement. A number of policing authorities have sought legal advice on this issue and received confirmation of this. The advice also confirms that S106 infrastructure is not limited to buildings and could include equipment such as surveillance infrastructure and CCTV, staff set up costs, vehicles, mobile IT and the Police National Database. A breakdown of non-building related infrastructure sought by MPS is detailed below. For example, in the case of The Queen (on the application of The Police and Crime Commissioner for Leicestershire) v Blaby District Council [2014] EWHC 1719 (Admin), Judge Foskett stated: 61... <i>“I do not, with respect, agree that the challenge mounted by the Claimant in this case can be characterised as a quibble about a minor factor. Those who, in due course, purchase properties on this development, who bring up children there and who wish to go about their daily life in a safe environment, will want to know that the police service can operate efficiently and effectively in the area. That would plainly be the “consumer view” of the issue. The providers of the service (namely, the Claimant) have statutory responsibilities to carry out and, as the witness statement of the Chief Constable makes clear, that in itself can be a difficult objective to achieve in these financially difficult times. Although the sums at stake for the police contributions will be small in comparison to the huge sums that will be required to complete the development, the sums are large from the point of view of the police. 62. I am inclined to the view that if a survey of local opinion was taken, concerns would be expressed if it were thought that the developers were not going to provide the police with a sufficient contribution to its funding requirements to meet the demands of policing the new area.”</i> The above conclusions echo those reached in an earlier appeal case of Land off Melton Road, Barrow-upon-Soar (APP/X2410/A/12/2173673), in which the Secretary of State endorsed the following findings of the Inspector: 291... <i>“the twelfth core planning principle of</i></p>	<p>The Council acknowledges the importance of working positively with infrastructure providers to ensure that the future needs of residents and communities are met. The new Local Plan and its associated Infrastructure Delivery Plan seek to identify the necessary investment in infrastructure needed to support growth across the Borough during the plan period.</p> <p>The Council, as the CIL charging and collecting authority is responsible for determining how developer contributions are allocated and distributed. The Council remains committed to working with its infrastructure partners to ensure that process is justified and transparent. The respondent is encouraged to positively engage in that process – setting out the investment required over the plan-period and the necessary to evidence to support their request for funds secured through CIL. As with other infrastructure partners, it is entirely within the respondent’s gift to present and justify their case for investment. It is noted that the respondent has not presented any evidence in support of their position – instead there is an assumption that planned-for growth automatically correlates to increased criminal activity. In response, the Council suggests that successful place-making can secure reductions in criminal activity.</p> <p>New Local Plan Policy DM2 E sets out a list of possible infrastructure investment areas. This is not intended to be an exhaustive list. Whilst “Policing” is not identified as a specific area of investment it is highlighted that at Policy DM2 E f) Community and social infrastructure is identified. This definition could encapsulate orthodox policing in addition to other community networks that seek to take preventative measures to manage criminal and anti-social activity.</p>	

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							<p><i>the Framework... can only be served if policing is adequate to the additional burdens imposed on it in the same way as any other local public service. The logic of this is inescapable. Section 8 of the Framework concerns the promotion of healthy communities and planning decisions, according to paragraph 69, should aim to achieve places which promote, inter alia, "safe and accessible environments where crime and disorder and the fear of crime do not undermine quality of life or community cohesion. There are other more recent appeal and court precedents with the most recent being in 2021. Full details of these can be made available upon request.</i></p> <p>Nature of Contributions Sought MPS have prepared a charging formula, based on the approach used by other Police and Crime Commissioners and tested through the above appeals and court cases. This seeks contributions towards the following categories of policing infrastructure in connection with new major developments (generally only those referable to the Mayor for London). <ul style="list-style-type: none"> • Staff set up costs. o Uniforms. Radios. o Workstation/Office equipment. o Training. • Vehicles o Patrol vehicles. o Police community support officers (PCSO) vehicles. o Bicycles. • Mobile IT: The provision of mobile IT capacity to enable officers to undertake tasks whilst out of the office in order to maintain a visible presence. • CCTV technologies: Automatic Number Plate Recognition (ANPR) cameras to detect crime related vehicle movements. • Police National Database (PND): Telephony, licenses, IT, monitoring and the expansion of capacity to cater for additional calls. • The provision of police office accommodation. </p> <p>Section 106 Contributions and Policing Summary MPS is working hard to achieve cost savings and find new and alternative sources of capital and revenue funding to support policing in London. Section 106 charges to support policing at Borough level are necessary and appropriate. As such, we ask that this be acknowledge within the Local Plan and / or Infrastructure Delivery Plan.</p> <p>Add more explicit reference to the need for policing related section 106 contributions to Policy DM2, or the supporting text.</p>		
CON080	REP423	Metropolit an Police			3	LWA	<p>We consider that the deletion of Site Allocation: 4 Havelock House, Telecom Site and Willow Tree House means that the draft plan is not positively prepared or justified. We understand from the Council's summary of Regulation 18 representations and responses that the proposed allocation was deleted because of a single representation, objecting to</p>	<p>The Council note the comments made in relation to land at 4 Havelock House, Telecom Site and Willow Tree House.</p> <p>For clarity, the land identified by the respondent in their representation is not</p>	No further action required in respect of the new Local Plan.

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							<p>the proposed allocation. This raised concerns about a potential loss of trees, impact on wildlife and also the need for further consultation.</p> <p>It was also suggested that the allocation was at odds with objective 9 which seeks to ‘promote and protect the ecological, biodiversity and amenity value of the Borough’s natural assets.</p> <p>The Council’s response confirms that the allocation will be deleted, but notes that the site is over 1.5 hectares and therefore warrants inclusion as a strategic site. The Council also refers to the expectation that a planning application may be received and would be considered against other policies in the plan. We do not believe that the issues raised in the objection impact on the principle of development for this site. If there are concerns about trees, wildlife, or the need for consultation these should be addressed in the wording of the proposed allocation or adjusting the potential dwelling yield of the site. We also note that the National Planning Policy Framework encourages Local Authorities to have regard for the need to make effective use of land. In this regard, paragraph 121 of the NPPF states that “Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them.” The subject site involves public land, where the Council has already identified that development proposals are likely to come forwards. The NPPF seeks a proactive approach to the delivery of such land. If the plan remains silent, this appears to run counter to the content of the NPPF.</p> <p>Re-instate the proposed site allocation for Site Allocation: 4 Havelock House, Telecom Site and Willow Tree House. If necessary, the site allocation can be adjusted to acknowledge the need to consider trees, wildlife and consultation.</p>	<p>included as a site allocation within the new Local Plan. As such the Council considers this an omission site, and as such its exclusion from the new Local Plan as a site allocation is not a matter of soundness.</p> <p>The land at 4 Havelock House, Telecom Site and Willow Tree House (Honour Oak Road) has not been allocated for development within the new Local Plan. That is a fact.</p> <p>For clarity, the land was considered as a candidate site allocation option through the plan-making process and consequently discounted. The land was the subject of a draft site allocation identified during an earlier Regulation 18 stage. The land is not required to meet Lewisham’s housing need. On that basis the Council maintain that the Plan remains sound.</p> <p>The Council maintains that the land at 4 Havelock House, Telecom Site and Willow Tree House could come forward for consideration as part of the decision-taking process.</p>	
CON081	REP424	Lewisham and Greenwich NHS Trust			0	General	<p>LEWISHAM COUNCIL LOCAL PLAN REVIEW REGULATION 19 CONSULTATION APRIL 2023 REPRESENTATION ON BEHALF OF LEWISHAM AND GREENWICH NHS TRUST</p> <p>Thank you for the opportunity to make representations on the Lewisham Council (‘LC’) Local Plan. This submission is made by Iceni Projects (‘Iceni’) on behalf of Lewisham and Greenwich NHS Trust (‘the Trust’) in response to the Lewisham Council</p>	<p>The Council thanks the Lewisham and Greenwich NHS Trust for their continued partnership involvement in the on-going plan-making process. The Council notes and welcomes the Trust’s broad support for the new Local Plan.</p> <p>Where it is shown to be necessary the Council will work with its infrastructure delivery partners, including the Lewisham</p>	<p>No further action required in respect of the new Local Plan.</p> <p>If necessary, prepare, agree, and submit a Statement of Common Ground between the Lewisham and Greenwich NHS Trust and the Council. This should set out how the two partners have worked</p>

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							<p>Local Plan Regulation 19 Consultation open from 1 March 2023 to 25 April 2023.</p> <p>These representations are the first to be made by the Trust on the new Local Plan.</p> <p>As a key stakeholder within the borough and a driver of Lewisham's health services, the Trust is keen to contribute to the Local Plan Review, as the growth and development of the borough over the next twenty years will be strongly tied to the improvement and betterment of the existing University Hospital Lewisham ('UHL') and the Trust's other community sites. Furthermore, it has been anticipated that this will be reciprocated through the acknowledgement, within policy, of the aspirations the Trust has for health infrastructure provision within the borough.</p> <p>It is understood that this is the final consultation on the new Local Plan prior to submission to the Planning Inspectorate for Examination in Public and this consultation is part of LC's engagement strategy to give stakeholders the opportunity to make comments upon the soundness of the draft policies for publication.</p> <p>Paragraph 35 of the National Planning Policy Framework (2021) ('NPPF') states that plans are 'sound' if they are:</p> <p><i>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</i></p> <p><i>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</i></p> <p><i>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</i></p> <p><i>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.</i></p> <p>Accordingly, this letter sets out the Trust's representations on the policies within the new Local Plan and provides responses on key issues pertinent to UHL and other Trust community sites, within the context of future aspirations to improve the existing UHL infrastructure and community sites and spatial</p>	and Greenwich NHS Trust, to prepare, agree, and submit Statements of Common Ground.	together through the plan-making process on shared objectives.

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							<p>requirements to expand. These representations follow meetings had with planning officers regarding the future delivery of a phased masterplan for the UHL site.</p> <p>a. The Trust & Lewisham Council The Trust was established on 1 October 2013 and is responsible for the UHL site, located on Lewisham High Street, SE13 6LH in addition to a range of other community health services in Lewisham and the Queen Elizabeth Hospital (QEH) in Woolwich, Royal Borough of Greenwich.</p> <p>Historically UHL occupied the former site of seventeenth century almshouses and a workhouse (1817). Some of these workhouse buildings remain today on the site towards the southern end. The Grade II Listed Lewisham Public Library also falls in the demise of UHL site and is the only other surviving pre-twentieth-century buildings within the site. During World War 1, the workhouse transitioned from a pauper's hospital to being a military hospital. Following this in 1929 it became a municipal hospital. Since this period of time UHL has seen continuous development including the north of the site which includes a former maternity building of the 1930s and in more recent years change on the south west corner of the site towards the Ravensbourne River. The almshouses were replaced in the 1950s by a registry office. As recent as May 2022 planning permission has been granted for development on the UHL site.</p> <p>Today UHL excels at offering a wide range of medical services as a district general hospital including accident and emergency through to cardiology, maternity, dermatology, intensive care, and general medicine, to name a few. The existing facilities for patients and visitors includes family accommodation and on call residential facilities for workers, car (including blue badge) and cycle parking, onsite pharmacy café and shop and accessibility measures for less abled people. The continuous development of the UHL site has resulted in an ad hoc collection of varied hospital buildings. Some of the building stock is ageing whilst other structures are obsolete and in need of re-purposing/ reconfiguration or assessed for building retention versus demolition/ redevelopment.</p> <p>Lewisham is identified by the Greater London Authority as being in a designated Opportunity Area. As such Lewisham has seen significant development and growth over the years. As the population of Lewisham continues to expand (the new Local Plan forecasts that Lewisham's population is forecast to rise by some 42,400 people or 14 per cent by 2040), the Trust</p>		

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							<p>has turned its attention to the UHL site and other Trust community sites to ensure it is prepared to meet future needs and utilise the spatial capacity of UHL and other sites which is paramount to their success.</p> <p>Over the next ten to fifteen years, the Trust seeks to redevelop, expand, and adapt, in collaboration with LC, the existing UHL campus (and other community sites) to cater for the new healthcare demands arising from population growth and changing demographics. The Trust is seeking to continue to provide a modern fit for purpose hospital campus which intensifies and makes more efficient use of the site as a whole, increases legibility and wayfinding (within and outside of the site) and is designed to be flexible and adaptable to meet evolving models of health and care delivery. In addition, the Trust would like to lower the existing UHL site's carbon emissions and provide a design that delivers on user experience for patients, visitors, and workers, to meet local need and attract in new professional talent to work in the Borough. In order to achieve these aims, a new and enhanced UHL campus would need to be facilitated by a phaseable and deliverable masterplan for the UHL site which can be delivered incrementally and offers flexibility to respond to the evolving needs of healthcare and the community.</p> <p>As a large anchor institution, whose long term sustainability is directly related to wider borough initiatives and the wellbeing of the population, the Trust seeks a better connected and welcoming frontage to Lewisham High Street and the surrounding communities, and seeks to improve the commercial offer on café, convenience retail and pharmaceutical uses. The Trust also wishes to ensure that there is provision of usable and accessible external public spaces for the use and enjoyment of patients, Trust staff and members of the public alike. UHL has already been successful in accommodating the first 'Wellbeing Garden' in London for staff, patients, and the local community in response to the Covid-19 pandemic, delivered in partnership between the NHS and Royal Horticultural Society. There is an opportunity to build on this provision through additional green spaces which might include multi-function green spaces for children's play, therapeutic gardens, fitness, recovery and general enjoyment by staff, patients, and visitors, linking with the green nature of the site's location nearby Ladywell Fields and opening access to the Ravensbourne River.</p> <p>LC was one of the first boroughs in London to declare a "climate emergency" in 2019 and have produced their</p>		

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							<p>Lewisham Climate Emergency Strategic Action Plan 2020-2030 with an ambition for the borough to be carbon neutral by 2030. The NHS is also seeking a greener approach and is aiming to be the world's first net zero national health service with a target of being net zero by 2040 for emissions which are directly controlled and a target of being net zero by 2045 for those emissions the NHS can influence. Against this climate emergency backdrop, accordingly the Trust has aspirations to decarbonise the existing UHL estate, through developing a site wide energy strategy, reduce reliance on gas and encourage energy efficiency and sustainability to achieve its Net Zero targets.</p> <p>The Trust is well placed to take hold of an excellent opportunity to develop a comprehensive masterplan approach in partnership with LC to enable the flexibility required to allow for UHL to adapt and develop as circumstances change.</p> <p>This letter sets out the Trust's thoughts in respect of relevant draft policies published within the new Local Plan and the soundness of the Council's approach to the strategic issue of health in the borough with specific reference to the UHL site and other Trust community sites.</p>		
CON081	REP425	Lewisham and Greenwich NHS Trust			1	Chapter 2	<p>a. Lewisham Today and Planning Ahead</p> <p>This section of the new Local Plan sets out the challenges and opportunities for the Local Plan to address. It notes in paragraph 2.3 to 2.4 that the population of Lewisham has grown by 23 percent over the last 20 years and is predicted to continue to grow till 2040. Currently 300,600 people live in Lewisham – an increase of 9% from 2011-2021. This increase is higher than the London average (7.7%).</p> <p>The Plan correctly acknowledges the significant proportion of the younger population. It is worth noting that the proportion of young people in the borough is greater when compared with national averages, with more people aged between 25 and 44.</p> <p>Paragraph 2.4 also notes that older people are the fastest growing demographic in London and the number and proportion of people aged 65 or more is expected to rise sharply over the next decades, including in Lewisham, according to the Centre for London. London: A place for older people to call home (2020) and Lewisham SHMAA (2022). In 2011-21 there was a 9.8% increase in people aged 65 years and older. The South East London Integrated Care System and NHS South East London have noted that the complexity of health needs is increasing whilst those needing care and the number of people living with multiple health conditions is also increasing.</p>	<p>The Council notes and welcomes the broadly supportive comments made in relation to the new Local Plan Chapter 2 Lewisham Today and Planning Ahead.</p> <p>The Council acknowledges the importance of health and wellbeing in its totality, and supporting healthcare infrastructure networks, to terms of successful place-shaping and plan-making. The new Local Plan has been prepared with the health and wellbeing of existing and future residents as a common thread that runs through its entirety. Equally, the new Local Plan seeks to address the investment and provision of necessary supporting infrastructure networks in a similar fashion. The Council considers this to be a sound approach.</p> <p>Nevertheless, the Council could consider expanding the text in Chapter 2 to include references to health and provision of the required social infrastructure to support planned-for growth. These additions, should they be shown necessary to ensure</p>	<p>Subject to them being demonstrably necessary to ensure soundness, the Council will consider amendments to Chapter 2 to include references to health and provision of the required social infrastructure to support planned-for growth. If required, these amendments will be agreed with the NHS Trust and brought forward through the modifications process.</p>

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							<p>Page 33 of the new Local Plan provides an overview on deprivation and inequality in the borough noting health inequalities across the borough and discusses serious health issues such as obesity, citing that more than half of Lewisham's adult population is overweight or obese. Further to this, disparities in health and wellbeing inequalities in access to services of ethnic minority groups in Lewisham is also acknowledged. Evidence from the South East London Integrated Care System and NHS South East London, notes that almost half of Lewisham's population are from ethnic minority backgrounds and these communities require the appropriate support to address health conditions such as diabetes, hypertension and stroke and the higher prevalence rates of some mental health conditions, including psychotic disorder and Post-Traumatic Stress Disorder (PTSD).</p> <p>London Plan Policy S1 'Developing London's social infrastructure' states that when preparing Development Plans, boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure.</p> <p>In order to facilitate a growing population, and various other health challenges in the borough the UHL campus and other Trust community sites will have to adapt and expand. The Trust believes that health in the borough and provision of the required social infrastructure to support local needs should be an integral part of the new Local Plan and therefore offer support for a greater presence of this topic in this section, in order to be consistent with strategic policy and ensure the new Local Plan has been positively prepared.</p>	soundness, could be brought forward through the modifications process.	
CON081	REP426	Lewisham and Greenwich NHS Trust				Chapter 3	<p>b. Vision, Strategic Objectives, and the Spatial Strategy</p> <p>Vision for Lewisham and Strategic Objectives</p> <p>Table 3.2 sets out the Lewisham Local Plan Strategic objectives and the Trust is supportive of an objective for Lewisham residents to benefit from high quality health care by protecting and planning for facilities to meet local needs.</p> <p>The Trust also welcomes the recognition given to NHS as a key stakeholder for delivering health services in the Borough on line 22 of the table.</p>	The Council notes and welcomes the support offered by the NHS Trust for the new Local Plan Chapter 3 Vision, Strategic Objectives, and the Spatial Strategy.	No further action required in respect of the new Local Plan.
CON081	REP427	Lewisham and Greenwich NHS Trust			2	OL 01	<p>Draft Policy OL1 'Delivering an Open Lewisham (spatial strategy)'</p> <p>The Trust acknowledges the intent in the Draft Policy OL1 of positive working relationships between the Council and other stakeholders to achieve the new Local Plan 'Vision' for Lewisham. The Trust agrees with the approach of directing new development to Opportunity Areas (part A) and the A21</p>	<p>The Council notes and welcomes the broad support offered by the NHS Trust for the new Local Plan Policy OL 01 Delivering an Open Lewisham (spatial strategy).</p> <p>The Council notes the comments made in relation to securing infrastructure</p>	No further action required in respect of the new Local Plan.

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							<p>Corridor (part D), optimising land through a design-led approach (part G) and requiring new development to integrate measures for climate change adaptation and mitigation (part I).</p> <p>In part E of the draft policy there is an absence in the policy wording of any mention of securing infrastructure to support the needs of Lewisham’s neighbourhoods and communities, although this is mentioned in the supporting policy text at paragraph 3.18.</p> <p>The draft policy wording states ‘<i>securing the delivery of new and improved infrastructure</i>’ but seemingly from an angle of investment and unlocking development, related to transport infrastructure only, rather than also making reference to the need for social infrastructure.</p> <p>The London Plan has specific policies regarding the protection and enhancement of social infrastructure. London Plan Policy S1 ‘Developing London’s social infrastructure’ states that development proposals which provide high quality, inclusive social infrastructure, that addresses a local or strategic need and supports service delivery strategies should be supported, particularly when easily accessible by public transport, cycling and walking and should be encouraged in high streets. London Plan Policy S2 ‘Health and social care facilities’ states that boroughs should work with NHS organisations to identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location, or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.</p> <p>The policy could be strengthened to align with these policies and the ‘social objective’ of the NPPF’s three pillars of sustainable development which should be delivered through the preparation and implementation of plans. We suggest that the wording is amended to read as follows to ensure the new Local Plan is positively prepared and consistent with national and strategic policy: <i>e. Securing the delivery of high quality new and improved infrastructure, including social infrastructure, as a catalyst for investment, and to unlock the development potential of sites across the Borough and meet existing and future Borough identified need to support London’s diverse communities. The delivery of the Bakerloo line extension [...].</i></p> <p>It is worth noting that ‘community infrastructure’ is not a terminology used in the London Plan, therefore, to remain</p>	<p>investment. The suggestion that the wording is made more explicit in terms of referencing neighbourhoods and communities is noted. However, the Council considers that this addition is unnecessary to ensure the soundness of the new Local Plan. It is an established fact that the role of the plan-making process is identify and guide future growth, and consequently also plan for the associated infrastructure networks need to support that growth. The Council concludes that this relationship between planned-for growth and consequential investment in infrastructure networks is clear.</p> <p>The suggested amendment to the wording of Policy OL 1 is noted. The Council concludes that whilst this may provide additional information it is unnecessary to ensure the soundness of the new Local Plan. It is established that the term “infrastructure” is expansive. It not only includes hard assets (such as buildings, transport networks and utilities), but also encompasses open spaces, biodiversity, playing pitches and community services.</p> <p>The Council notes the comments made in relation to the London Plan. The Council does not consider these to be matters of soundness. It is unnecessary for the new Local Plan to repeat policy set out in the London Plan, as the latter document is a component part of the Borough’s development plan. For clarity, the Council is required to seek confirmation from the Greater London Authority that the new Local Plan is in general conformity with the London Plan. That requirement sits outside of the legal and soundness tests for plan-making set out in national policy.</p> <p>The proposed amendment to introduce the term “social infrastructure” is also considered unnecessary to ensure soundness. The Council considers that the new Local Plan wording is clear in respect</p>	

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							consistent with the London Plan the above amendment includes the suggested wording 'social infrastructure.'	of what is meant by the existing term "community infrastructure".	
CON081	REP428 a and b	Lewisham and Greenwich NHS Trust				LCA Key spatial objectives and Figure 14.2	<p>c. Lewisham Central Area</p> <p>Vision and Key Spatial Objectives</p> <p>UHL is located within Lewisham's Central Area as identified in the new Local Plan. The vision for this area is for Lewisham (along with Catford) to evolve as a vibrant hub comprising a mix of uses and the new Local Plan highlights the importance of reimagining the A21 corridor and focusing new development along this key transport route. There is currently no mention of the importance of improvement to health and hospital facilities in the Lewisham Central Area which the Trust believes is crucial to support a growing population and to fully enable the area to evolve in a positive community focused way. There is a great opportunity for the UHL site to be recognised as a key enabler of the revisioning of the A21 Corridor.</p> <p>The Regulation 19 Infrastructure Delivery Plan September 2022 clearly sets out the priorities for health infrastructure which includes proposals of decarbonisation of the existing UHL site and various refurbishment, and reconfiguration projects associated with Lewisham Hospital. The document notes an indicative development delivery timescale of up to 2030 which falls within the plan period for the new Local Plan.</p> <p>As the UHL hospital infrastructure is of strategic borough importance, it is considered that to ensure the new Local Plan is effective, justified and a positively prepared, in regard to meeting its area based Vision for the Lewisham Central Area, reference should be made to aspirations for the UHL site in the key spatial objectives table on page 443. We suggest the text addition is worded as follows:</p> <p><i>Improved health across the borough through supporting the longevity of the existing University Hospital Lewisham estate through a phased masterplan approach and site wide decarbonisation strategy. Facilitate connectivity to the surrounds including the Ravensbourne River, public realm along Lewisham High Street and nearby open spaces.</i></p>	<p>The Council notes the comments made in relation to the new Local Plan Lewisham Central Area Key Spatial Objectives.</p> <p>The Council acknowledges that the healthcare assets, facilities, and services provided University Hospital Lewisham make a significant contribution to place-making across Lewisham Central Area. Consequently, the Council could consider the suggested additional text to the Key Spatial Objectives table (Page 443) as a possible major modification to be identified through the examination process.</p>	<p>Subject to them being demonstrably necessary to ensure soundness, the Council will consider amendments to the Key Spatial Objectives (Page 443) –</p> <p><i>"10 Improved health across the borough through supporting the longevity of the existing University Hospital Lewisham estate through a phased masterplan approach and site wide decarbonisation strategy. Facilitate connectivity to the surrounds including the Ravensbourne River, public realm along Lewisham High Street and nearby open spaces."</i></p> <p>Subject to the above addition being necessary the Council could also consider additional annotation to Figure 14.2 Central Area key diagram to identify the location of the University Hospital Lewisham.</p>
CON081	REP429	Lewisham and Greenwich NHS Trust			3	LCA 04	<p>Draft Policy LCA4 'A21 corridor'</p> <p>Part A of the Draft Policy LAC4 states that development proposals along the A21 corridor must demonstrate how they have responded positively to the A21 Development Framework (March 2022) document through a design-led approach. The Trust acknowledges the Framework and in particular the strategy in section 2.3 of this document.</p>	The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy LCA 04 A21 Corridor.	No further action required in respect of the new Local Plan.

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CON081	REP430	Lewisham and Greenwich NHS Trust			2	CI 01	<p>d. Community Infrastructure</p> <p>Draft Policy CI1 ‘Safeguarding and securing community infrastructure’</p> <p>The Trust is supportive of the approach of Draft Policy CI1 which references the Infrastructure Delivery Plan along with the relevant corporate plans and strategies of the Council and other key stakeholders as being considered in the decision making process for applications for major development proposals. The Trust acknowledges that it is vital for social infrastructure to be safeguarded and enhanced to support the needs of the borough.</p> <p>It is considered that the new Local Plan should show how the policies will help to ensure that the social, objectives of sustainability will be achieved. The existing Core Strategy CS Policy 20 (Delivering Educational Achievements, Healthcare Provision and Promoting Healthy Lifestyles) sets out that the Council will support the implementation of the NHS Lewisham Commissioning Strategy Plan and improved health across the Borough by supporting the Lewisham University Hospital, health centres and GP surgeries. It is requested to support a justified new Local Plan that the supporting policy text makes reference to supporting the Lewisham University Hospital in the aims of LC for infrastructure delivery.</p> <p>A further amendment is suggested in part A of the policy ‘<i>Local needs for community infrastructure [...]</i>’ is amended to read ‘<i>current and future local needs for community social infrastructure [...]</i>’.</p> <p>There is an interchangeable use of social infrastructure and community infrastructure in paragraph 9.1 of the supporting text. As already noted earlier in this letter, the London Plan refers to ‘social infrastructure’ rather than ‘community infrastructure’. For consistency with London Plan Policy, we recommend that this is amended throughout the new Local Plan to avoid confusion.</p>	<p>The Council notes and welcomes the support offered by the Lewisham and Greenwich NHS Trust in relation to the new Local Plan Policy CI 01 Safeguarding and securing community infrastructure.</p> <p>The Council notes the comment that the new Local Plan should show how the policies will help to ensure that the social, objectives of sustainability will be achieved. For clarity, the new Local Plan sets out how growth and infrastructure will integrate with one another through the Spatial Strategy (Policy OL 01). Equally, the new Local Plan must be read as a whole – as the objectives of the Spatial Strategy are delivered through the site allocations and planning policies.</p> <p>Whilst the Council understands why the NHS Trust has requested that the new Local Plan be amended to make explicit reference to the Lewisham University Hospital this is unnecessary to ensure soundness.</p> <p>The proposed amendment to introduce the term “social infrastructure” is also considered unnecessary to ensure soundness. The Council considers that the new Local Plan wording is clear in respect of what is meant by the existing term “community infrastructure”.</p>	No further action required in respect of the new Local Plan.
CON081	REP431	Lewisham and Greenwich NHS Trust			2	CI 02	<p>Draft Policy CI2 ‘High quality community infrastructure’</p> <p>It is noted that part A (c) of the Draft Policy CI2 states that ‘<i>Development proposals for new community infrastructure (including the alteration, extension, or reconfiguration of existing community infrastructure), will be supported where the facility [...] c. Is designed to maximise the flexibility and adaptability of space to accommodate a range of community uses.</i></p> <p>The supporting text at paragraph 9.1 defines community infrastructure as health services, education and training,</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy CI 02 High quality community infrastructure.</p> <p>The Council notes the comments made by the respondent. The Council will continue to work in partnership with infrastructure providers to ensure that network improvements are fully integrated in place-making.</p>	No further action required in respect of the new Local Plan.

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							community facilities (including public houses), places of faith, and sport and recreation facilities for people of all ages and abilities. The Trust recognises there is real scope to continue to integrate healthcare services with other suitable uses to generate activity around the UHL campus, and other community sites, which can create a welcoming environment and reduce stigma.		
CON081	REP432	Lewisham and Greenwich NHS Trust			2	HO 01	<p>e. Meeting Lewisham's Housing Needs</p> <p>Draft Policy HO1 'Meeting Lewisham's housing needs'</p> <p>The Trust is supportive of the Council's approach to work positively and proactively with stakeholders, including development industry partners, to facilitate delivery of new homes to help meet Lewisham's housing needs.</p> <p>In particular the Trust supports the delivery of a much higher quality of housing design (for both proposed and existing housing) which can both help prevent ill health in the community and help with the recruitment and retention of public service workers, including those crucial to the operation of emergency services and the health system. The Trust would welcome acknowledgement of this need within the policy or supporting text which is vital to enable delivery of sustainable development.</p>	<p>The Council notes and welcomes the support offered by the Lewisham and Greenwich NHS Trust in relation to the new Local Plan Policy HO 01 Meeting Lewisham's Housing Needs.</p> <p>The Council notes the specific comments made in relation to securing good quality housing that positively contributes towards the recruitment and retention of public service workers, including those crucial to the operation of emergency services and the health system. The Council acknowledges the objective of the comment and recognises that this is an area of housing need. Nevertheless, the Council considers that the new Local Plan Policy HO 01 addresses this matter under Part C which sets out the policy's approach to securing Housing Choice. Policy HO 01 states –</p> <p><i>"To help ensure that local residents and other people have access to a wide range of suitable 156 housing provision, the Council will:</i></p> <p><i>b. Support development proposals that meet the needs of specific groups including: families with children, older people, people with disabilities, students and vulnerable people;</i></p> <p><i>c. Promote and support innovative housing designs, such as modular housing, particularly where these address acute or specialist local housing needs..."</i></p> <p>The Council considers that this approach to this specific matter is sound.</p>	No further action required in respect of the new Local Plan.
CON081	REP433	Lewisham and			2	SD 02	<p>f. Sustainable Design and Infrastructure</p> <p>The Trust is committed to decarbonising the existing UHL site in order to meet their net zero targets. It is acknowledged that</p>	The Council notes the comments made in relation to the new Local Plan Policy SD 02 Sustainable design and retrofitting.	No further action required in respect of the new Local Plan.

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		Greenwich NHS Trust					<p>part C of draft Policy SD2 requires BREEAM 'Excellent' unless it cannot be demonstrated that this is not feasible.</p> <p>The Trust wishes to be as sustainable as possible but also to maintain development viability. BREEAM can increase build costs and whilst the supporting policy text at paragraph 11.6 suggests some level of flexibility [<i>'All proposals will be considered having regard to individual site circumstances and the nature of development proposed.'</i>] the Trust would support the addition of 'or economically viable' to part F of the policy to strengthen it and ensure deliverability of the new Local Plan's objectives.</p>	The Council welcomes and encourages the NHS Trust to continue with their objective of decarbonising the uses at the University Hospital Lewisham. Responding positively in mitigating the adverse impacts of climate change remains and will continue to remain a key component of successful place-making throughout the plan-period and beyond. The Council considers that the approach set out in the new Local Plan Policy SD 02 is positively prepared, justified, and effective. It is entirely reasonable that proposals continue to be considered on their merits through the decision-taking process. The new Local plan allows for this to happen.	
CON081	REP434	Lewisham and Greenwich NHS Trust			2	SD 06	<p>Draft Policy SD6 'Improving air quality'</p> <p>The Trust recognises the importance of improved air quality in seeking to better public health in Lewisham. As such the Trust is supportive of the new Local Plan policy which advocates for minimising the population's exposure to poor air quality and which requires development proposals to seek to improve air quality and be as a minimum air quality neutral and not lead to further air quality deterioration.</p>	The Council notes and welcomes the support offered by the Lewisham and Greenwich NHS Trust in relation to the new Local Plan Policy SD 06 Improving Air Quality.	No further action required in respect of the new Local Plan.
CON081	REP435	Lewisham and Greenwich NHS Trust			2	QD 04	<p>g. Building Heights</p> <p>Draft Policy QD4 'Building heights' part A states that tall buildings (defined as 10 storeys or 32.8 meters, measured from the ground level to the top of the building (including roof top equipment), will be assessed against London Plan Policy D9 'Tall buildings.' Part B of Draft Policy QD4 goes on to say that tall buildings should only be developed in locations identified as appropriate for tall buildings on the Proposed Policies Map and that development proposals for tall buildings outside of these zones will be resisted. Part D of the draft policy similarly says that tall buildings will only be permitted where they are in a designated 'Tall Building Suitability Zone'.</p> <p>The Proposed Policies Map January 2023, also subject to the Lewisham Local Plan Regulation 19 Consultation, does not include the UHL site within the 'appropriate location for tall buildings' designation. Therefore, any tall buildings in this location would be in conflict with Draft Policy QD4. There would also be a conflict with London Plan Policy D9 because it stipulates that locations for tall buildings and appropriate tall building heights should be identified on maps in the Development Plan.</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy QD 04 Building Heights – specifically in respect of the requirement that tall new buildings be delivered through master planning.</p> <p>The Council notes the comments made in relation to the new Local Plan Figure 5.1 Tall Buildings suitability plan. The Council acknowledge the fact that the University Hospital Lewisham site is in an area that is shown as being less suitable for tall new buildings. The Council considers this position to be justified.</p> <p>For clarity, the A21 Development Framework, whilst a material consideration in decision-taking, is not classified by the Council as forming part of the development plan.</p>	No further action required in respect of the new Local Plan.

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							<p>Draft Policy LCA4 'A21 Corridor', requires development proposals along the A21 to demonstrate how they have responded positively to the A21 Development Framework. On page 22 and 43 of this document, which is a material consideration in decision making, it states suggested building heights for new development in the Character Area Framework: University Hospital Lewisham, Park, and Greens (where the UHL site is located) of 9-30 metres or 3-10 storeys. The A21 Development Framework by way of Draft Policy LCA4 is supportive of a ten storey building in this area (classed as tall by the new Local Plan) but Draft Policy QD4 and by extension London Plan Policy D9 is not.</p> <p>Whilst it is noted that paragraph 1.9 of the A21 Development Framework states the University Hospital Lewisham is excluded from the scope of the study and height maps on pages 90 and 92 of the new Local Plan, show the UHL site to be in a location which is more sensitive to height and outside of the 'appropriate locations for tall buildings' boundary, clarification from LC would be welcomed so that the UHL masterplan can respond accordingly to the Development Plan. This clarification will also ensure the new Local Plan is effective, justified and positively prepared in accordance with the strategy that has been developed for the A21 corridor to meet objectively assessed requirements to support the growth of Lewisham.</p> <p>We note reference is made to both 'Appropriate locations for tall buildings' and 'Tall Building Suitability Zones'. We suggest an amendment to the terminology to ensure consistency and clarity.</p> <p>The Trust is supportive of Part F of Draft Policy QD4 which says that tall buildings must be delivered through a masterplan process in order to ensure that they are appropriately located.</p>	However, it is possible that the framework could be transformed into a supplementary planning document in the future. For any supplementary planning document to be a material consideration it must be in accordance with adopted policy. Subject to it being converted to supplementary planning document status the Council will seek to align the Draft A21 Development Framework with the new Local Plan following its adoption.	
CON081	REP436	Lewisham and Greenwich NHS Trust			2	DM 03	<p>h. Masterplans and comprehensive redevelopment</p> <p>Draft Policy DM3 'Masterplans and comprehensive development'</p> <p>Although the UHL site is not subject to a site allocation in the new Local Plan, the Trust acknowledges Draft Policy DM3 'Masterplans and comprehensive development' as a way to secure the Local Plan's vision and strategic objectives and as previously noted, the Trust is seeking to prepare a masterplan for the UHL site which it hopes to develop in a collaborative manner with LC, the local community, and other relevant stakeholders.</p>	The Council notes and welcomes the support offered by the Lewisham and Greenwich NHS Trust in relation to the new Local Plan Policy DM 03 Masterplans and comprehensive redevelopment.	No further action required in respect of the new Local Plan.
CON081	REP437	Lewisham and			2	TR 01	<p>i. Sustainable Transport</p> <p>Draft Policy TR1 'Sustainable transport and movement'</p>	The Council notes and welcomes the support offered by the Lewisham and	No further action required in respect of the new Local Plan.

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		Greenwich NHS Trust					<p>Accessibility to the Trust's hospitals and healthcare community sites for both staff and patients is a key issue for the Trust. The Trust advocates for sustainable infrastructure to support increased accessibility for cycling, walking, and e-charging of electric cars.</p> <p>Therefore, the Trust is supportive of Draft Policy TR1 'Sustainable transport and movement' which seeks for development to take into account connectivity and access to existing and planned future public transport. Positively, the policy goes on to say that the Council will work in partnership with stakeholders to secure improvements to the public transport network to help tackle local deprivation and ensuring equality of access to opportunities which the Trust is highly supportive of.</p> <p>We suggest Part D of the policy includes the mention of access to healthcare as well as just opportunities.</p>	<p>Greenwich NHS Trust in relation to the new Local Plan Policy TR 01 Sustainable Transport.</p> <p>The Council notes the specific comments made by the Trust in relation to the new Local Plan Policy TR 01 D. The Council considers that the proposed amendment is unnecessary to ensure soundness. The text at new Local Plan Policy TR 01 D is not intended to be expansive or definitive. It would be impractical for the policy to be entirely inclusive of the places and uses that sustainable travel networks would connect. The Council considers that the policy is clear in it is intent to secure networks that connect to places that people need/ wish to visit as parts of their future life in Lewisham. The Council considers this sound.</p>	
CON081	REP438	Lewisham and Greenwich NHS Trust			2	TR 03	<p>Draft Policy TR3 'Healthy streets as part of healthy neighbourhoods' requires development proposals to demonstrate how they have applied the London Plan Healthy Streets Approach and Indicators through a design-led approach. The policy also advocates for safeguarding and enhancing the Borough's walking and cycling routes plus highlights the importance of high-quality public realm in delivering the Healthy Streets Approach. These policies are important to encourage increased take up of public transport use and a move away from car usage which in turn will help improve borough air quality, which also has implications for poor health. The Trust encourages this policy approach.</p> <p>j. Conclusions We trust that the above representations will be considered as part of the Regulation 19 Consultation on the draft Local Plan. The Trust seeks proactive engagement with LC, given the Trust's role as a key stakeholder within the Borough, and commitment to providing an improved healthcare service for now and generations to come. We would welcome the opportunity to discuss these representations and the Trust's aspirations further with you.</p>	The Council notes and welcomes the support offered by the Lewisham and Greenwich NHS Trust in relation to the new Local Plan Policy TR 03 Healthy streets as part of healthy neighbourhoods.	No further action required in respect of the new Local Plan.
CON082	REP439	HUDU			0	General	<p><u>Lewisham Local Plan Proposed Submission Draft Regulation 19</u> <u>NHS HUDU response to consultation</u></p> <p>Thank you for the opportunity to make representations on Lewisham's proposed Submission Draft Local Plan. This</p>	The Council notes the general introductory comments made in relation to the new Local Plan. The Council welcomes the positive comments made by the respondent in relation to the plan-making process – specifically in relation to how the	No further action required in respect of the new Local Plan.

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							<p>response has been developed in consultation with the South East London Integrated Care Board (SELICB) and NHS providers. We requested an extension to the timescale to respond due to pressures on the NHS, however, being advised that the Inspector is only required to consider those responses submitted within the formal consultation period we are ensuring we meet this, with a request for further discussion in relation to revisions of the Council's Infrastructure Delivery Plan.</p> <p>The ICB and providers have been reviewing the health estate required to meet the needs of Lewisham's growing and changing population and is working closely with the Council to identify areas for joint work and collaboration.</p> <p>We are pleased to note that most of our proposed amendments to the Regulation 18 Local Plan have been taken on board and incorporated in the current document. This includes the introduction of new Policy DM6 Health Impact Assessments, the inclusion of the additional clause covering public safety within Policy QD4 Tall Buildings, amendments to QD7 Amenity and Agent of Change, and adding reference to emergency vehicles in Policy TR5 Deliveries, servicing, and construction.</p> <p>Our comments at this stage focus on amendments that we consider necessary for the plan to be found sound and for clarity and ease of reference which is important for effective use of the plan by developers and stakeholders.</p>	<p>Council considered and acted upon comments submitted at the earlier Regulation 18 consultation stage.</p> <p>The Council is committed to working with its infrastructure delivery partners to ensure that proportionate and appropriate investment continues to be directed towards the Borough's networks in support of growth.</p>	
CON082	REP440	HUDU			2	CI 01	<p>Policy CI 1 Safeguarding and protecting community infrastructure</p> <p>In our response to the Council's Regulation 18 consultation we requested that the reference is expanded to <i>social and community infrastructure</i>. Social infrastructure is the terminology widely used in the London Plan and other strategic policy documents. We note this broader term is included within the Council's draft Plan under Policy DM2 Infrastructure Funding and Planning Obligations. Therefore, for greater consistency with the London Plan and to aid clarity and ease of understanding it would appear sensible to use social and community infrastructure in all policy wording throughout the Plan.</p> <p>We raised concern in our earlier response that the requirement under London Plan Policy S1 for boroughs to undertake an assessment of social needs had not been fully met. While additional evidence has been undertaken in relation to local and town centres there appears not to have been any undertaken in relation to social and community infrastructure. Ideally this</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy CI 01 Safeguarding and securing community infrastructure.</p> <p>The Council has considered the proposed amendment to introduce the term "social and community infrastructure". The Council concludes that this is unnecessary to ensure soundness. The Council considers that the new Local Plan wording is already clear in respect of what is meant by the existing term "community infrastructure" – see supporting text Paragraph 9.1.</p> <p>The Council has sought to work positively with its infrastructure partners to identify the investment required to support the scale and nature of growth identified</p>	No further action required in respect of the new Local Plan.


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							<p>would be in place for the submission draft plan, and if not as soon as possible. This is important to ensure the rapid and large-scale development in the borough is accompanied not only by sufficient health and education infrastructure but also by the local community infrastructure which is vital to health and wellbeing of individuals and communities. The increase in specialist housing, whether primarily for the young with student housing, and co-living or for older residents through extra care also adds to the importance of offering both formal and informal spaces where communities can come together, and different communities can interact to support community cohesion and reduce social isolation. We would be keen to contribute to this work alongside the Council and key stakeholder including the community and voluntary sector.</p> <p>Reference is made to the IDP, however, the IDP does not detail the range of local infrastructure within the voluntary and community sector, and the informal meeting places which are made possible through the design of open space and the public realm where social interaction is encouraged and supported. Further comments in relation to the IDP are made later in this response.</p>	<p>through the new Local Plan. That investment is translated into the Borough-wide Infrastructure Delivery Plan, which identifies and prioritises the necessary specific schemes. The schemes identified through this process are cover the full range of infrastructure investment – including green infrastructure, open space and other improvements that positively contribute towards securing the health and well-being of residents and communities.</p> <p>The new Local Plan also contains planning policies that seek to protect and enhance the “other” community infrastructure assets alluded to within the representation. These include policies that address public houses, town centre uses and cultural facilities – all of which contribute towards health and well-being. The Council considers this to be sound approach.</p>	
CON082	REP441	HUDU			4	DM 07	<p>DM7 Monitoring and Review Table 19.</p> <p>We welcome the expansion of the monitoring indicators now under DM7 Monitoring and Review Table 19.1. However, how the reduction in health inequalities is measured should be more detailed. Paragraphs 28-29 of the draft plan highlight key indicators of deprivation and inequalities and it could be appropriate to use one or more of these and record spatial differences as the objective of reducing inequalities will require the Council to understand the impact of the plan on different neighbourhoods. It would also be helpful for indicators to include targets so that progress against these can be kept under review rather than simply a number for many individual indicators.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy DM 07 Monitoring and Review.</p> <p>The Council acknowledges and understands why the respondent considers it desirable for the new Local Plan to undertake more thorough monitoring of health inequalities. However, the Council upon consideration concludes that the current extent of performance indicators is proportionate and appropriate for the new Local Plan. The Council, as part of the annual Authority Monitoring Report process, monitors a wide range of relevant indicators that assess the improvements secured through sustainable development. These include access to open space; natural environments/ green infrastructure; and management of potentially harmful uses (such as A5 food takeaways). The Council considers this to be proportionate and sound.</p> <p>In parallel the Council also monitors the delivery of necessary infrastructure</p>	No further action required in respect of the new Local Plan.

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								<p>through the Infrastructure Delivery Plan and the associated Infrastructure Funding Schedule. The former continues to be an ideal vehicle for infrastructure delivery partners to identify necessary interventions and investments during the life of the plan.</p> <p>The Council considers that its infrastructure partners will have greater access to and understanding of detailed performance indicators, and the necessary interventions that these may trigger. Consequently, they will be better placed to identify infrastructure network opportunities, which can be brought forward through the Infrastructure Delivery Plan and/ or the Local Plan. The Council encourages its infrastructure partners to continue working positively with these processes. The Council considers this to be a sound approach to this matter.</p>	
CON082	REP442	HUDU			4	DM 06	<p>Policy DM6 Health Impact Assessments</p> <p>While we very much welcome the inclusion of this policy we suggest additional wording to ensure the health benefits set out in HIAs and the minimisation and mitigation of potential adverse impacts are secured. Reference as in other policies to use of planning conditions or obligations should be incorporated. This will help ensure the health and wellbeing elements are delivered as part of the overall scheme.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy DM 06 Health Impact Assessments.</p> <p>The Council notes that the new Local Plan must be read and considered in its entirety. This matter is already addressed through the new Local Plan Policy CI 1 Safeguarding and securing community infrastructure, which provides the link between new growth, the infrastructure that is necessary to support it, and the mechanisms for securing developer contributions to deliver investment. The council considers this a sound approach to this matter.</p>	No further action required in respect of the new Local Plan.
CON082	REP443	HUDU			3	LSA 02	<p>Policy LSA2 Strategic Area for Regeneration</p> <p>In order to ensure the objectives of the Local Plan are delivered additional wording should be provided before Clause B b as it is insufficient to ' seek opportunities to ' and we propose amended wording to read; <i>developers will be required to</i> b. Plan positively for social infrastructure to meet local needs, particularly community facilities and services catered to children and young people <i>and older people</i>;. The additional</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LSA 02 Strategic Area for Regeneration.</p> <p>The Council notes the specific comments and suggested amendments made in relation to the policy requirements seeking to tackle inequalities and the environmental, economic, and social</p>	No further action required in respect of the new Local Plan.

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							reference to older people is required given the forecast growth of the over 65s within Downham Ward over the plan period. The GLA's population explorer tool indicates that the population of Downham ward aged 65 years and above will increase from 1916 in 2020 to 2999 in 2040 an increase of 56%.	barriers. The respondents reasoning for introducing the first suggested amendment is understood. However, the suggested amendment sets a very high bar for development industry partners that may prove difficult and unreasonable to secure through decision-taking. Consequently, the Council maintains the existing wording is sound. The comment and suggested amendment relating to the requirement that development delivers investment that caters for specific demographics is based on evidence of need within the area/ place and the interventions necessary to support future planned-for growth. For this reason, the Council concludes the policy approach is sound.	
CON082	REP444	HUDU			4	DM 02	<p>DM2 Infrastructure funding and planning obligations</p> <p>This policy references social and community infrastructure which is welcomed as it provides consistency with London and other strategic policy and captures the full scope of infrastructure supporting local residents and the wider community. If this phrase is used in the policy then providing examples including health infrastructure (primary, community, mental health and acute) within the explanation would be welcomed, or alternatively health infrastructure could be listed as a specific line in the policy.</p> <p>The Infrastructure Delivery Plan</p> <p>Reference is made throughout the plan to the IDP including for example in Policy CI 1 Clause B where reference to development demonstrating that they meet additional demands particularly where "there is an identified need for additional provision, as set out in the Infrastructure Delivery Plan". If additional weight is to be given to those areas within the IDP then the Council must ensure that this is kept up to date. The current IDP, dated September 2022, relies on evidence gathered sometime prior to this. We are therefore keen to work with the Council to update the health section of the IDP in the coming weeks to ensure it is as up to date as possible before submission to the Secretary of State.</p>	<p>The Council notes the comments and welcomes the broad support offered in relation to the new Local Plan Policy DM2 Infrastructure funding and planning obligations. The Council notes the suggested addition and could consider a modification to refer to health infrastructure through the main modification process.</p> <p>The Council also notes the comments made in relation to the Infrastructure Delivery Plan. Whilst this is important, it is not a matter of soundness for the new Local Plan. Nevertheless, the Council is in the process of formalising arrangements with its internal and external partners to ensure that there is a formalised mechanism for annually reviewing the Infrastructure Delivery Plan. This will provide a regularised process for partners to update the Infrastructure Delivery Plan.</p>	<p>Subject to it being considered necessary to ensure soundness, the Council will consider a modification to the new Local Plan Policy DM2 Infrastructure Funding and Planning Obligations –</p> <p><i>"E. The following is a list of areas where planning obligations may be sought, recognising that other types of obligations may be necessary depending on the nature of a proposal and individual site circumstances: ...</i></p> <p><i>f. Community and social infrastructure (including health infrastructure)"</i></p>
CON082	REP445	HUDU			3	LEA SA 03	<p>Site Allocation – Leegate Centre</p> <p>This allocation includes provision of a health facility; however, it is important that if this is to be included within the allocation that further detail is included to reflect that the requirement for</p>	The Council notes and welcomes the comments made in relation to the new Local Plan Policy LEA SA 03 Leegate Shopping Centre.	Subject to it being demonstrably necessary for soundness, or desirable for decision-taking consider the introduction of the following addition to Paragraph

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							<p>health would incorporate ground floor accommodation with access for emergency vehicles, blue badge and other parking for frail patients provided on an affordable and sustainable basis.</p> <p>We look forward to continuing our to work closely with the Council.</p>	<p>The Council notes the further input from the respondent suggesting further policy detail setting out the nature of future potential on-site health provision. The Council considers that the additional text is not necessary to ensure soundness. However, the Council could consider introduce some additional text to meet this request through the main modifications process.</p>	<p>16.28 as part of the main modifications process –</p> <p><i>“Provision of community infrastructure to meet demand arising from the development, including a new health facility in partnership with the CCG, NHS and other health bodies. New provision should include ground floor accommodation with access for emergency vehicles, blue badge, and other parking for frail patients.”</i></p>
CON083	REP446	Natural England			0	General	<p>Planning Consultation: Statement of Representation – Lewisham Local Plan</p> <p>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 1st March 2023.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation.</p> <p>For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk</p>	<p>The Council notes and welcomes the broad support offered to the new Local Plan by Natural England.</p> <p>Where it is shown to be necessary the Council will work with its statutory partners, including Natural England, to agree and submit Statements of Common Ground.</p>	<p>No further actions required in relation to the new Local Plan.</p> <p>If necessary, prepare, agree, and submit a Statement of Common Ground between Natural England and the Council.</p>
CON084	REP447	The Coal Authority			0	General	<p>Thank you for your notification of 01 March 2023 regarding the Lewisham Local Plan - Regulation 19 Consultation.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>As Lewisham Council lies outside the defined coalfield, the Planning team at the Coal Authority has no specific comments to make.</p>	<p>The Council welcomes the Coal Authority’s response and confirmation that they have no specific comments to make in relation to the new Local Plan.</p>	<p>No further actions required in relation to the new Local Plan.</p>

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CON085	REP448	London Borough of Bromley			0	General	<p>Local Plan Regulation 19 Consultation</p> <p>Thank you for the opportunity to comment on the Lewisham Local Plan Regulation 19 consultation. As set out in our comments on the Regulation 18 draft Lewisham Local Plan, we consider that this is a comprehensive policy document which has been underpinned by careful consideration and evidence, and we support the broad objectives of the plan. We note that there have been several amendments to the document which address (in full or in part) comments made on this previous draft.</p> <p>We have provided specific comments below, which relate back to comments made on the Regulation 18 draft document.</p>	The Council welcomes the general comments made by the London Borough of Bromley. The Council notes that the conclusion that the new Local Plan is a comprehensive document that is underpinned by careful consideration and evidence. The Council welcomes the broad support for the new Local Plan expressed by the London Borough of Bromley.	No further actions required in relation to the new Local Plan.
CON085	REP449	London Borough of Bromley			2	HO 01	<p>HO1 Meeting Lewisham’s Housing Need</p> <p>At Regulation 18 stage, we noted some concern that policy HO1 aimed to maximise housing delivery against the Local Housing Need figure. LBB objected to this approach as it is contrary to the London Plan, and we set out that Bromley would not be in a position to accommodate any of Lewisham’s housing need.</p> <p>Policy HO1 has been amended and now correctly refers to the London Plan targets. We support these amendments.</p>	The Council notes the comments made in the representation and welcomes the London Borough of Bromley’s support for new Local Plan Policy HO 01.	No further actions required in relation to the new Local Plan.
CON085	REP450	London Borough of Bromley			2	HO 05	<p>HO5 Accommodation for older people</p> <p>At Regulation 18 stage, we noted that policy H5 (previously HO6) included clauses that were onerous including the need for specialist older person accommodation to be supported by community infrastructure (clause c) and to avoid an over concentration of care home accommodation (clause h). The Regulation 19 policy has addressed these concerns.</p>	The Council notes the comments made in the representation and welcomes the London Borough of Bromley’s support for new Local Plan Policy HO 05.	No further actions required in relation to the new Local Plan.
CON085	REP451	London Borough of Bromley			2	QD 04	<p>Policy QD4 Building Heights and Figure 5.1</p> <p>We commented at Regulation 18 stage that Figure 5.1 of the draft Plan was confusing and there was no key accompanying it to explain what the different shades of green meant. We also set out that the policy should address impacts from proposed tall buildings on adjoining boroughs. There was also concern that some of the green shading in Figure 5.1 was crossing over into Bromley to the south of Lower Sydenham Station. The Regulation 19 identifies three locations close to the Bromley boundary where tall buildings are considered to be suitable in principle (Grove Park, Sydenham and Lower Sydenham). Figure 5.1 has been amended and includes a key to explain the different shades of green (indicating areas considered suitable for tall buildings) which is supported. There is still a small area of green shading at Lower Sydenham Station which straddles Lewisham and Bromley, as shown in the red outline on the image below. We would support a further change to remove this remaining green shading.</p>	<p>The Council notes the comments made in the representation and welcomes the London Borough of Bromley’s support for new Local Plan Policy QD 04.</p> <p>The Council notes the identified error to Figure 5.1, which appears to show the tall building suitability designation extending beyond the Borough boundary into Bromley.</p> <p>The comments made in relation to supporting text Paragraph 5.34 are also noted.</p>	<p>Amend Figure 5.1. Amend the extent of the tall building suitability designation in accordance with the submitted comments.</p> <p>Consider amendments to supporting text Paragraph 5.34 in response to the submitted comments. The modified text could read –</p> <p>“Impacts include those in the building’s immediate vicinity, surrounding area and elsewhere in London, particularly in relation to places in neighbouring Boroughs”.</p>

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							 <p>Paragraph 5.34 makes reference to the impact of proposed tall buildings on the building's immediate vicinity, surrounding area and elsewhere in London but this could be strengthened by making explicit reference to adjoining boroughs.</p>		
CON085	REP452	London Borough of Bromley			2	TR 02	<p>Policy TR2 Bakerloo line extension</p> <p>At Regulation 18 stage, we commented that policy TR2 could be strengthened by including an explicit reference in the supporting text noting that the policy has no relevance where the buffer crosses the Borough boundary. The Regulation 19 draft, Paragraph 12.12 of the supporting text has been expanded to include:</p> <p><i>"Where the 400 metres zone extends into neighbouring Boroughs the relevant Local Planning Authority should be consulted on relevant policy requirements."</i></p> <p>This amendment is welcomed and addresses our previous comment.</p>	The Council notes the comments made in the representation and welcomes the London Borough of Bromley's support for new Local Plan Policy TR 02.	No further actions required in relation to the new Local Plan.
CON085	REP453	London Borough of Bromley			2	CI 01	<p>Policy CI1 Safeguarding and securing community infrastructure</p> <p>At Regulation 18 stage, we set out that Policy CI1 stated that the Council will work collaboratively with stakeholders to identify current and projected future requirements for community infrastructure, and to secure the necessary provision of this infrastructure. This was supported but we considered that it might be useful to cross- reference specific large-scale development areas in particular, as these are likely to result in the need for increased provision, for example school provision.</p> <p>The Regulation 19 policy CI1 does not appear to cross reference to specific large scale development areas but has been amended to make reference to proposals within site allocation policies securing identified need through the masterplan process. The policy also states that in other areas where need is identified in the IDP, applicants should set out how this will be addressed. This amendment is welcomed.</p>	The Council notes the comments made in the representation and welcomes the London Borough of Bromley's support for new Local Plan Policy CI 01.	No further actions required in relation to the new Local Plan.

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CON085	REP454	London Borough of Bromley			2	SD 04	Policy SD4 Energy infrastructure Policy SD4 refers to heat networks and requires major developments to connect and possibly extend existing or planned future heat networks on or in proximity to their site. At Regulation 18 stage, we suggested additional wording which refers to potential connection to networks in adjacent Boroughs. The Regulation 19 draft does not include any additional references, but on reflection we consider that Paragraph 11.17 does address the point raised previously.	The Council notes the comments made in the representation and welcomes the London Borough of Bromley's support for new Local Plan Policy SD 04.	No further actions required in relation to the new Local Plan.
CON085	REP455	London Borough of Bromley			3	LSA SA 06	<p>Site allocations Lewisham South Area – Allocation 6 (Worsley Bridge Road Locally Significant Industrial Site) sets out the potential for co-location of compatible commercial and residential uses.</p> <p>We do not have any in principle issues with this allocation, but we would welcome reference to the Lower Sydenham LSIS designation on the opposite side of the railway tracks within Bromley, particularly relating to the need for new residential or other sensitive uses to adhere to the agent-of-change principle and ensure that they do not impact on the ongoing functioning of this area. There is also designated MOL in close proximity to this site along Worsley Bridge Road, which could be a relevant consideration for any development, particularly in terms of building heights.</p> <p>With regard to the other proposed site allocations, we have no specific comments but would welcome sites near the Borough boundary making explicit reference to this and the need to consider impacts on Bromley.</p> <p>We look forward to engaging with you further in relation to cross-boundary strategic matters in the future, including the preparation of a statement of common ground where necessary.</p>	<p>The Council notes the comments in relation to new Local Plan Policy LSA SA 06 and the broad support expressed by the London Borough of Bromley for the site allocation.</p> <p>The Council notes the specific comments made in relation to the Lower Sydenham LSIS located across the Borough boundary in Bromley.</p> <p>The Council also notes the specific comments made in relation to the Metropolitan Open Land located along Worsley Bridge Road.</p>	<p>Consider modifications to supporting text Paragraph 17.38 to include references to the need for partnership working with the London Borough of Bromley in relation to possible impacts upon the neighbouring Lower Sydenham LSIS, and the Metropolitan Open Land located along Worsley Bridge Road.</p> <p>Where appropriate make minor modifications to other relevant Lewisham South Area site allocations supporting text to include reference to partnership working with the London Borough of Bromley.</p>
CON086	REP456	Shrimplin Planning & Developme nt, OBO Howard Lewisham Ltd			2	EC 04	<p>Shrimplin Planning & Development, on behalf of Howard Lewisham Ltd. (part of Howard Group), are making objections to Policy EC4: low cost and affordable workspace. Not targeted</p> <p>Emerging Local Plan Policy EC4 applied to all development proposals incorporating workspace.</p> <p>This is not consistent with London Plan Policy E3: Affordable Workspace which is makes clear that the policy should be targeted to very specific circumstances.</p> <p>London Plan Policy E3 Part A is very specific about what types of business the policy is aimed at, namely those with a "...specific social, cultural or economic development</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 04 Low-cost and affordable workspace.</p> <p>The specific suggestion that the new Local Plan "rides roughshod" over the London Plan is noted and discounted. It is highlighted the Mayor/ the GLA have not identified this specific matter as an issue of general conformity in any way.</p> <p>The London Plan does form part of the development plan for Lewisham and as such is already a material consideration for</p>	No further actions required in relation to the new Local Plan.

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							<p>purpose...” such as for “specific sectors” that have social value (criterion 1); “specific sectors” that have cultural value (criterion 2); disadvantaged groups (criterion 3); uses that support educational outcomes (criterion 4); and start-up and early stage businesses or regeneration (criterion 5).</p> <p>Part B also sets out the “defined circumstances” where the policy could apply, including in particular specific locations and, within those locations, specific types of uses: “2) in areas identified in a local Development Plan Document where cost pressures could lead to the loss of affordable or low-cost workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones) 3) in locations identified in a local Development Plan Document where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.</p> <p>London Plan Policy E3 also works alongside a suite of policies including Policy E2 Providing suitable business space, Policy E4 Land for industry, logistics and services to support London’s economic function, Policy E5 Strategic Industrial Locations (SIL). Each of these focus on the needs of specific types of development.</p> <p>However, emerging Local Plan Policy EC4 runs roughshod over these carefully calibrated considerations, applying it to all sectors and all locations.</p> <p>There is no explanation in the Policy or supporting text of what the “specific social, cultural or economic development purpose” that is trying to be achieved.</p> <p>The supporting text to emerging Local Plan Policy EC4 accepts that low-cost floorspace has a role to play supporting specific types of use. However, the Policy does reflect this: “It accommodates traditional business sectors and, in Lewisham, has a key local role in supporting the cultural, creative and digital industries.” (paragraph 8.23)</p> <p>The supporting text also accepts that low-cost floorspace occurs in specific locations. Again, the Policy does reflect this: “This type of space is often located at the back of town centre sites, under railway arches and in smaller or constrained industrial sites... Low-cost workspace has typically been scattered across town centres and areas such as New Cross and Deptford. Clusters are also present along the Overground</p>	<p>decision-takers. It is unnecessary for the new Local Plan to slavishly repeat the content of the London Plan to secure general conformity and soundness.</p> <p>The technical evidence supporting the new Local Plan demonstrates that the demand/ need for affordable workspace provision will continue throughout the plan period. For clarity, Paragraph 8.22 states –</p> <p><i>“Lewisham’s Employment Land Study (2019) and Local Economic Assessment (2019) identify rising commercial sales and rental rates and the lack of low-cost and affordable workspace as an important issue in the Borough. The cost and availability of workspace can create a barrier to entry in the local economy and wider community, posing challenges for businesses and groups seeking to locate to, start-up or expand in Lewisham. This is particularly for micro, small and independent businesses as well as social enterprises, charities and voluntary organisations.. The Local Plan therefore seeks to ensure that existing low-cost and affordable workspace is retained and that new provision is created as commercial development comes forward.”</i></p> <p>The above position is supported through the Regulation 19 consultation – with some respondents making the specific case for new affordable provision and safeguarding of existing floorspace – particularly, where it supports business start-ups and the creative industry. For these reasons, the Council considers the policy sound.</p>	

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							<p>line corridor, for example, around Forest Hill and Brockley stations.” (paragraph 8.23).</p> <p>Emerging Local Plan Policy EC4 is based on a number of evidence base documents including the Lewisham Local Economic Assessment (December 2018), the Lewisham Creative & Digital Industries Strategy (November 2017) and the Lewisham Employment Land Study (March 2019). These reports do not identify a pressing need for affordable workspace. Where some need is identified it is for office type uses, not industrial or warehouse uses.</p>		
CON086	REP457	Shrimplin Planning & Developme nt, OBO Howard Lewisham Ltd				EC 04	<p>SILs should be excluded from Policy EC4 so as not to restrict their potential to fulfill these functions and drive economic growth. However, as currently worded the Policy does not allow for this.</p> <p>The emerging Policy should be much more targeted about what type of uses it applies to and where it applies.</p> <p>Part A of the policy adopts a blanket approach of all sites having to provide units of different types, sizes, rents, users. However, this gives no consideration to what is achievable or appropriate for a specific site. Some sites, particularly the Strategic Industrial Locations, are established location for large format industrial and warehouse buildings and is where larger scale buildings are directed. This Part precludes redevelopment for large scale units.</p> <p>Units that are old, constrained and/or poor quality provides poor quality accommodation which, as a result, commands a low rent. The Policy effectively protects this floorspace, preventing redevelopment to modern, effective, higher quality floorspace of the type that can support the economy and generate jobs.</p> <p>The Policy says that low-cost workspace should be let at “reasonable local market rates” but does not define what this is.</p> <p>The protection of low-cost floorspace is not consistent with the London Plan. London Plan Policy E3 is aimed at protecting and delivering affordable workspace. It only mentions “low-cost” workspace in Policy E3 Part B(2) which says that “consideration” should be given to providing affordable workspace to replace low-cost floorspace. This is in areas that are specifically defined a local Development Plan Document. The supporting text explains that this is “...to support sectors that have cultural or social value such as artists, designer-</p>	<p>The Council notes the further comments made in relation to the new Local Plan Policy EC 04 Low-cost and affordable workspace – specifically in respect of requirement that all development proposals incorporating workspace should ensure that provision is made for suitable types and sizes of units, at an appropriate range of rents.</p> <p>Strategic Industrial Locations The Council acknowledges that some of the Strategic Industrial Locations found in Lewisham are indeed large sites dominated by equally large single buildings, such as strategic warehouses. However, there is an equal if not greater proportion of Strategic Industrial Locations that are populated by multiple industrial uses. Typically, these are characterised by the multiple final-mile distribution points, or smaller/ start-up type businesses; the latter for example finding homes in railway arches.</p> <p>The suggestion that the provision of affordable workspace prevents the redevelopment of existing large-scale units/ sites is disputed. It is not supported by any evidence from the respondent – it is an anecdotal statement. In contrast, the Council can draw upon its own experiences and evidence as the local planning authority to demonstrate the effectiveness of this policy approach. Other evidence, including viability testing, has not raised this matter as a barrier to growth.</p>	No further actions required in relation to the new Local Plan.

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							<p>makers, charities, voluntary and community organisations and social enterprises for which low-cost space can be important.” (paragraph 6.3.4, existing emphasis)</p> <p>We recognise that proposals that development proposals that incorporate an element of affordable workspace at rents maintained below the market rate for social, cultural or economic uses “will be considered favourably”. However, that should not preclude developments that do not, or cannot, incorporate affordable workspace from being considered on their merits and determined in accordance with the development plan.</p> <p>The requirement for affordable workspace should be calculated on the net increase in floorspace. Otherwise it penalises redevelopment of existing sites.</p> <p>Emerging Local Plan Policy EC4 simply says that new affordable workspace must be secured for “...a specified period agreed by the Council”. This does not give landowners, developers and occupiers certainty. A fixed period should be allowed with the flexibility to amend this so that it can be adjusted as part of the overall mix of provision.</p> <p>Emerging Local Plan Policy EC4 says merely that “consideration” will be given to affordable workspace that has been secured on a temporary basis as a meanwhile use. This is contrary to the London Plan which specifically, and very sensibly, rules out inclusion of meantime uses.</p> <p>London Plan Policy E3: Affordable Workspace is explicit that meantime uses are excluded. This recognises that meantime uses can occupy a site whilst land redevelopment proposals take shape. This might include land assembly or phased development of a larger site, and so the meantime uses could be in place for some time. Part B(1) specifically excludes: “...where it is demonstrated that the affordable workspace has been provided on a temporary basis pending redevelopment of the site”.</p> <p>Policy EC4 will add uncertainty to the development process as it will not be clear if meantime uses are considered or not. This will restrict development potential.</p> <p>Emerging Local Plan Policy EC4 should be amended as follows: “G Where there is existing affordable workspace this should be retained. Development proposals requiring planning permission that involve the loss of existing affordable</p>	<p>Furthermore, the new Local Plan (considered in its entirety) provides sufficient flexibility to allow development partners and decision-takers to apply judgement where such matters can be robustly demonstrated. For these reasons, the Council considers the policy sound.</p> <p>Older Accommodation The suggestion that older, constrained, and poor-quality employment accommodation generates low rents is noted. However, the implication that the policy perpetuates such conditions is challenged. It is for individual landowners, property investors and developers to determine cost benefit of redevelopment. The Council is seeking to put in place policy measures that encourage and facilitate a positive change in stock but ultimately decisions of such investment sit elsewhere. The new Local Plan provides sufficient flexibility to allow development partners and decision-takers to apply judgement where such matters can be robustly demonstrated.</p> <p>Favourable Consideration The statement that the policy favourably considers proposals for social, cultural, or economic use ahead of other potentially appropriate uses is challenged.</p> <p>Calculation of Off-Site Contributions The comments on this matter are noted. For clarity, the policy primarily seeks to secure on-site provision. The policy provides flexibility for the use of financial contributions where it is demonstrated to the satisfaction of the Council that on-site provision is not feasible or off-site provision will provide greater economic benefits. For that reason, the suggestion that it penalises the redevelopment of existing sites is strongly disputed. The whole-plan viability assessment demonstrates that it does not endanger development in circumstances where an off-site contribution is the only option.</p>	

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							workspace (including consented but undelivered workspace) will be refused unless the equivalent amount of affordable workspace is replaced on-site or re-provided elsewhere in Lewisham. Affordable workspace that is replaced or re-provided must be of at least the same quality as the existing provision and secured on equivalent terms, or alternative terms agreed by the Council. In applying this policy consideration will be given to affordable workspace that has been secured on a temporary basis as a meanwhile use will be excluded.”	<p>Duration of Provision The comment made about the process for agreeing the duration of new affordable workspace is noted and discounted. The Council highlights that the process will (in many cases) involve a third-party affordable workspace provider – who will lease and manage the space. It is logical that the duration of any provision is subject to negotiation. Alternatively, in circumstances where the developer is also the owner/ occupier the policy provides flexibility to identify and agree a reasonable and enforceable period of operation. The Council considers this approach sound – as the negotiation process will provide development partners with much greater certainty.</p> <p>Meantime/ Temporary Uses The Council notes the comments made in relation to meantime and temporary. The Council acknowledges that the policy does state that proposals for providing affordable workspace as a meanwhile use will be considered.</p> <p>For clarity, the London Plan Policy E 3 Affordable Workspace, states under Paragraph 6.3.6</p> <p><i>“Landowners sometimes provide affordable workspace on a voluntary and temporary basis prior to the redevelopment of a site. This provision makes good use of sites that may otherwise remain vacant. The temporary use of a site should generally be secured through a temporary planning permission and must not result in an unacceptable impact on residential amenity or prevent development sites from being brought forward for development in a timely fashion. Parameters for any temporary use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties.”</i></p>	

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								The new Local Plan seeks to manage the delivery of these temporary uses through Policy DM 5 Meanwhile uses. The Council considers that the policy clearly sets out an approach that allows temporary uses to facilitate wider growth objectives. For these reasons, the Council concludes that the policy is sound.	
CON086	REP458	Shrimplin Planning & Developme nt, OBO Howard Lewisham Ltd			2	EC 05	<p>The supporting text to emerging Local Plan Policy EC5: Strategic Industrial Locations (SIL) highlights the importance of Strategic Industrial Locations (SIL) to London's economy and to Lewisham's: "Lewisham's SILs make up a significant proportion of the Borough's industrial capacity and are key areas for business activity and local jobs. They are also well-positioned to play a more integral role in supporting the London CAZ81 which is a driver of the regional economy." (paragraph 8.31).</p> <p>The supporting text also highlights that SILs are particularly appropriate for distribution, which are often large footprint units: "This includes industrial capacity for logistics and last mile distribution, 'just-in-time servicing' and other related functions as SIL are the most appropriate locations in the borough for these types of activities." (paragraph 8.31)"</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 05 Strategic Industrial Locations (SIL).</p> <p>Scale of Distribution/ Logistics Warehousing The comment raised about the possible physical size (in terms of floorspace) of distribution and logistics warehousing is noted. The Council acknowledges that such uses, particularly those located near strategic highway networks – such as those adjoining the M1 and M25 – can cover a significant floorspace area. However, within Lewisham the Council anticipates that demand will focus upon considerably smaller sized provision – as currently demonstrated. Typically, final mile/ just in time distribution uses are modest and can be accommodated; in multiples; at Strategic Industrial Locations. For this reason, the Council maintains that the policy is sound.</p>	No further action required in relation to the new Local Plan.
CON087	REP459	Pegasus Group OBO Anerley Estate			2	EC 19	<p>Policy EC19 – Public houses The policy seeks to extend the minimum period of continuous marketing required before a former public house can change use from 24 months (as per the 2021 London Plan) to 36 months. The policy and supporting text seems to largely justify this change on the basis of providing additional policy protection for public houses to stop them being redeveloped for other uses, and whilst we do not dispute the cultural and community importance of public houses we would raise the following points:</p> <ul style="list-style-type: none"> • Firstly, this policy does not align with the recently adopted London Plan from 2021, which requires 24 months marketing, and as far as we are aware there has been no mayoral or London wide directive to suggest that this should be increased, nor any evidence that existing pubs in Lewisham are under any 	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 19 Public Houses.</p> <p>The new Local Plan Policy EC 19 is clear in setting the importance of public house provision to the Borough – both in terms of their use (as community facilities) and their contribution as heritage assets (either designated or non-designated). It is also clear in setting out the objective of retaining public houses across the Borough. The Policy clearly sets out a criteria-based approach for the consideration of proposals relating to existing public houses. It states that –</p>	No further action required in relation to the new Local Plan.

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							<p>heightened risk than elsewhere in London, to justify this potentially onerous change.</p> <ul style="list-style-type: none"> • Secondly, and more importantly, the pub and wider hospitality sector is currently under significant and unprecedented pressure from the combined effects of the cost of living crisis, spiralling energy costs, high interest rates, staffing and supply chain challenges as well as changing lifestyles (with less young people visiting pubs generally). As such many pubs are closing down at the moment as they are simply unviable, and not because landowners/ landlords are seeking to redevelop them for higher value uses. This pressure often is even more acute for some of the more historic and valued premises as these are often larger and more expensive to run. Whilst these pressures are particularly acute in the short term they show no sign of changing significantly even in the medium term (the next 3-5 years). Therefore increasing the marketing period to 3 years seems particularly counterproductive at the current time as it is highly unlikely to provide additional protection to pubs (which if they are unviable for 2 years wont suddenly become viable in year 3). Instead it will penalise landowners/ developers by forcing them to sit on vacant and unviable public houses for 50% longer, at a time when wider economic growth has slowed and landowners/ developers are under their own related pressures around high interest rates and costs. <p>Therefore we respectfully request that Policy EC19 is amended to align with the London Plan and keep the marketing period requirement to 24 months based on the current economic climate.</p> <p>If there is still a feeling that an increase in the marketing period could genuinely help protect Lewisham's pubs, then this could always be brought in via an SPD at a later date when the wider economic climate and pressures on the hospitality sector have eased.</p> <p>Finally, if the Council are to retain this policy as drafted, we would ask that it includes transitional arrangements such that it is only applicable to marketing processes started after the adoption of the plan (or at the very least marketing processes that are less than 12 months old).</p> <p>This would stop this policy from impacting marketing processes and redevelopment schemes that are already substantially progressed and where commercial/ financial decisions and commitments have already been made on the basis of the current 24 month period, as otherwise this could</p>	<p><i>"Public houses are unique and integral features of Lewisham's neighbourhoods and cultural identity, and perform important community, social and economic functions locally. There will be a presumption in favour of the retention of public houses in Lewisham. Development proposals involving the loss of a public house that has heritage, economic, social or cultural value to the community, including through change of use or redevelopment, will be refused unless there is robust and authoritative evidence to demonstrate that..."</i></p> <p>The Council considers that the marketing requirement whilst rigorous is proportionate given the policy objectives around the retention of public houses, evidence of loss of public houses over the years, and recognition they are community infrastructure in accordance with national planning policy.</p> <p>Whilst the new Local Plan should be in general conformity with the London Plan, it is neither a legal requirement nor a test of soundness, that it be consistent in every respect. There is scope and flexibility for the new Local Plan to diverge from both national and London Plan policy where justified. The Council highlights that the Greater London Authority has not raised this as either a matter of consistency or conformity. The Council suggests that contrary to the representation, the new Local Plan is entirely consistent as it seeks to protect these valued assets and uses.</p>	

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							<p>have significant negative consequences for developers at a time of significant economic uncertainty.</p> <p>I trust the above representations are clear and reserve the right to make further comments on this matter at the Examination Stage as appropriate. I would also be happy to discuss this issue further with policy officers.</p>		
CON088	REP460	Home Builders Federation			2	OL1	<p>Lewisham Local Plan: Regulation 19 consultation</p> <p>Thank you for consulting on the Lewisham Local Plan, Regulation 19 version. The following response is provided by James Stevens, Director for Cities, on behalf of the Home Builders Federation (HBF).</p> <p>The Home Builders Federation (HBF) is the representative body of the home building industry in England and Wales. The HBF's member firms account for some 80% of all new homes built in England and Wales in any one year, and include companies of all sizes, ranging from multi-national, household names through regionally based businesses to small local companies. Private sector housebuilders are also significant providers of affordable homes, building 50% of all affordable homes built in the last five years, including all homes for social rent.</p> <p>We note that some areas, such as those to the east of the borough around Crofton Park, Honor Oak Park and Telegraph Hill, Sydenham, and Ladywell stations- are not identified as Growth Nodes even though they have rail stations. The Local Plan needs to be amended to support residential delivery in these locations. They might not be suitable as full growth nodes, owing, we assume, to the shortage of brownfield land in these locations, but they could potentially support the supply of many small sites, especially through the process of incremental densification.</p> <p>The policy supports new residential development up to a point – it directs development towards the Opportunity Areas, Growth, Regeneration Nodes etc. This is helpful. However, the policy is vague on what will be supported in other areas of the borough, such as Brockley, Telegraph Hill, Crofton Park, Ladywell, Forest Hill, Sydenham Hill etc. It is apparent that all areas of the borough are well-connected by public transport but some seem to fall outside of the areas where development is supported. In keeping with Policy H2 of the London Plan, which aims to increase significantly the supply of homes on small sites – as described in para. 4.2.3 – all areas of the borough should be able to contribute to delivering against the housing targets in the London Plan.</p>	<p>The Council maintains the new Local Plan's Spatial Strategy Policy OL1 is sound. It is justified and effective in providing a framework for future growth across the whole Borough.</p> <p>The new Local Plan's Spatial Strategy is clear in setting out the planned-for pattern of growth and infrastructure investment/delivery across the whole Borough. The Strategy seeks to direct new development to Growth Nodes, Regeneration Nodes, and well-connected sites. However, this is not at the exclusion of other places across the Borough not identified as such.</p> <p>The representation assumes that all places with rail stations should (by implication) function as Growth Nodes. This is not supported by any evidence from the respondent. The Council considered this suggested approach to growth to be unsound. The Spatial Strategy's Growth Nodes, Regeneration Nodes and Growth Corridors have been identified as appropriate locations for growth for several evidenced reasons. Critically this encompasses their capacity to accommodate sustainable growth. The places cited for inclusion in the representation are typically residential suburbs, served by suburban-style railway stations. These places neither have the quantum of deliverable and developable sites to accommodate growth nor the capacity within their visual character and appearance to accommodate change. Nevertheless, the Spatial Strategy and the new Local Plan (as a whole) does not exclude the potential from these places should the opportunities arise.</p>	No further action required in relation to the new Local Plan.

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							<p>The London Plan aims to secure more housing on small sites especially through a process of incremental densification – as described in para, 4.2.4 – where development in PTALs 3-6, or within 800m of a public transport node (defined by the London Plan as a Tube, rail, DLR or tram station) or town centre boundary (defined by the London Plan as including district centres), is expected to play an important role in contributing to the small sites target. In Lewisham’s case, that small sites requirement averages out at 379 homes a year.</p> <p>The policy should be strengthened by the Council spelling-out how residential development will be supported in the locations outside of those specified. For example, the Policy OL1 could be amended by adding a new part E, coming before the current E (which becomes F, and so on) that says:</p> <p><i>In all other locations, small scale residential development (0.25 ha or less) in existing residential areas, will be encouraged, especially where the site is located within PTALs 3-6 or within 800m distance of a station or town centre boundary. Where the site is located further away from this, or in areas with lower PTAL levels, the Council will consider the merits of the proposal.</i></p> <p>HBF considers this is necessary so that the Local Plan provides policy support to enable the Mayor of London’s strategic aim for small sites to be successfully implemented.</p>	<p>The suggested additional text is noted. Whilst this addition may provide additional detail it is not considered necessary to make the new Local Plan sound.</p>	
CON088	REP461	Home Builders Federation			2	QD 01	<p>QD1 Delivering high quality design in Lewisham</p> <p><u>The policy is unsound because it is ineffective.</u></p> <p>We note Part G of the policy which states:</p> <p>Development must be appropriately supported by infrastructure. Development proposals will be expected to consider, and be linked to, the provision of future planned levels of infrastructure along with the timing of the delivery of this infrastructure. Where there is insufficient capacity of existing infrastructure to support a development proposal, applicants will be required to work with infrastructure providers to ensure sufficient capacity will exist at the appropriate time, including through the phasing of development.</p> <p>We are concerned that what might constitute infrastructure, the timing of its delivery, and the requirement for applications to link to this provision, could be a very demanding requirement.</p>	<p>The Council considers that new Local Plan Policy QD 01 is sound.</p> <p>It is unclear from the representation why the Home Builders Federation, and the organisations that it represents, would not want to secure necessary infrastructure to support their products. The representation does not explain how the provision of infrastructure through the new Local Plan is any different from existing approaches.</p> <p>The requirements set out under new Local Plan Policy QD 01 G are not unreasonable. It is entirely appropriate for the Council, its infrastructure partners and development industry partners to work together to secure the delivery of necessary infrastructure. The Council reiterates that there is nothing onerous in the</p>	<p>No further actions required in relation to the new Local Plan.</p>

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							<p>This might become such a difficult thing to plan and coordinate that no application for residential development could be allowed. The policy is very open ended.</p> <p>We understand the Council's concerns, but the Council, through its policies in the local plan, should be clear about what infrastructure is necessary to make a development acceptable. This would avoid situations where a development proposal which is compliant in all other respects with the local plan, is refused on new grounds.</p>	<p>requirement set out under Policy QD 01 and that is effective.</p>	
CON088	REP462	Home Builders Federation			2	QD 06	<p><u>The policy is unsound because it is ineffective.</u></p> <p>The policy is unnecessary. Applicants will always tend to optimise the capacity of the site, owing to the cost of land and the challenge of accommodating various planning policy requirements. The challenge for the applicant will be to optimise the density of a site when other consultees may seek a lower density development, which is not uncommon. It would be more helpful if the policy was amended to read that the <u>Council</u> will work with the applicant to optimise the density of schemes. This will signal that this is the Council's expectation to optimise the density of development as much as it is the applicants.</p> <p>We note the wording of Part C. This states that:</p> <p>Where development proposals do not accord with the indicative capacity set out in a site allocation policy, they will only be supported where it is clearly demonstrated the optimal capacity will be achieved, having regard to (A) and (B) above.</p> <p>It is unclear how the Council would respond to a proposal where the housing capacity of the site <u>exceeded</u> the 'indicative capacity' in the site allocation. Exceeding the indicative capacity may be the optimal capacity of the site. Therefore, it would be helpful if the Council amended the policy to read:</p> <p><i>Where development proposals do not accord with the indicative capacity set out in a site allocation policy, because the proposal exceeds that indicative capacity, the Council will consider merits of the proposal having regard to the importance of increasing housing supply across London.</i></p>	<p>The Council maintains that new Local Plan Policy QD 06 is sound.</p> <p>The Council notes the comments made by the Home Builders Federation. The Council appreciates the respondents optimistic outlook on this matter. As the local planning authority, the Council has considerable experience of development industry partners promoting standard products that fail to optimise the opportunities provided by development sites. The council understands that this may be a symptom, or condition of the commercial market. As such it is appropriate that the Council introduces policy interventions that encourage innovation and good design. This is supported by national planning policy.</p> <p>The Council considers that positive engagement with development industry partners is a key component of securing good quality places through growth. Such partnerships are dependent upon mutual trust and require both parties to work together.</p> <p>The Council considers that the policy approach to indicative site allocation capacities is in accordance with national planning policy. Namely that proposals coming forward through the development management with higher intensity development will considered on their merit and in consideration of supporting technical evidence.</p>	<p>No further action required in relation to the new Local Plan.</p>

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CON088	REP463	Home Builders Federation			2	QD 10	<p><u>Part G is unsound because it is unjustified.</u></p> <p>Part G will tend to militate against the supply of housing through small sites. The Council states that:</p> <p>Development proposals that will result in the loss of garden land, including private back gardens, will be strongly resisted.</p> <p>It would be more positive if the Council considered the merits of residential development proposals on garden land on its merits, rather than adopting an initial position of strong resistance. Residential development on gardens is unlikely to be common, but there may be circumstances when proposals might have merit. As defined by the London Plan, Lewisham has a target of 3,790 homes to achieve on small sites (sites of 0.25ha or less) in the first ten years of the plan (or an average of 379 a year). Increasing the supply of homes across London by increasing the opportunities for development on small sites is a strategic priority for the London Plan (see London Plan, para. 4.2.1). The small sites component represents a substantial element of the Mayor's planned supply of homes – 23% of all homes are expected to be provided on small sites of 0.25ha in size. Courtyard gardens and good balconies can still be integrated in the developments providing green space and biodiversity net gain.</p> <p>We acknowledge that achieving the small sites targets will be challenging for many boroughs. Consequently, optimising the opportunities to allow for small site development would be better than closing-down routes to this.</p> <p>Consequently, it would be better if the policy read:</p> <p>Development proposals that will result in the loss of garden land, including private back gardens, <u>will generally be resisted, but proposals will be considered on their merits.</u></p>	<p>The Council maintains that the approach to considering development proposals upon infill and backland sites, garden land and amenity areas is sound.</p> <p>The respondent's representation is unclear as to why they consider the approach is unjustified. There is comprehensive evidence that such sites, particularly those located within intensely developed metropolitan areas can make a significant contribution towards several benefits including amenity, biodiversity, and climate change mitigation. It is noted that the respondent has not presented any evidence to the contrary.</p> <p>The Council agrees that such small sites can contribute to the objective of delivering new planned-for growth on small sites. The new Local Plan supports this not only through this policy but also through the Spatial Strategy Policy OL1 Delivering an Open Lewisham and Policy HO2 Optimising the use of small housing sites.</p> <p>The Council notes the suggested amendment to the wording of Policy QD 10. However, the proposed modification is not a matter of soundness – by the respondent's own admission their suggestion makes the policy "better" as opposed to be essential to make it sound.</p> <p>In conclusion, the Council reiterates that Policy QD 10 is justified and effective. Proposals on such sites are already considered on their merits and where appropriate the policy wording is positive.</p>	No further action required in relation to the new Local Plan.
CON088	REP464	Home Builders Federation			2	HO 01	<p>HO1 Meeting Lewisham's housing needs</p> <p>HBF agrees with the Council's approach to meeting the housing target that has been set by the London Plan. The Plan aims to deliver 1,667 dwellings per annum for each of the fifteen years of the Plan. This would require 25,005 homes in total (1,667 x 15). Instead, we note that the Council is aiming to provide 27,730 net additions, thereby exceeding the ten-year target set</p>	<p>The Council considers that new Local Plan Policy HO 01 is sound.</p> <p>Plan Period Housing Target The Council notes and welcomes the respondent's comments made in relation to new Local Plan Policy HO 01 with specific reference to the approach to</p>	No further action required in relation to the new Local Plan.

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							<p>by the London Plan and the requirement for the last five-years based on rolling-forward the annual average London Plan figure.</p> <p>HBF recognises that there is no definitive approach for planning for housing requirements for local plan periods that extend beyond the timeframe of the London Plan – which is 2019/20 to 2028/29. However, the approach followed by Lewisham is one that other London boroughs have followed, including Lambeth and Barnet councils through their new local plans.</p> <p>We agree with the Council that it is appropriate to plan for a figure of 27,730 over the plan period. This will help to close the strategic scale gap between housing need in London and supply. There is a strategic housing shortfall across London of 14,000 homes a year. This is the difference between the objective (unconstrained) need for 66,000 homes a year identified by the London Plan and its supporting SHMA 2017, and the realistic capacity to provide 52,000 homes a year.</p> <p>We note also Lewisham’s SHMA published in 2019. In applying the Standard Method, this identifies a need for 2,964 based on the draft 2017 London Plan target (where the minimum housing need is capped at 40% above the base figure). See para. 5.31. This alternative local approach to assessing the housing need - indicating a higher level of need - supports the decision of the Council to role forward the London Plan annual average figure of 1,667 for the last five-years of the Plan.</p> <p><u>Five-year housing land supply and trajectory</u></p> <p>It would be helpful if the Plan could be clear about what is the annual average housing target figure. This would be essential for monitoring purposes, such as the calculation of the five-year housing land supply and the housing delivery test. If the total requirement is for 27,730 homes to be delivered over 15 years (2023/24 to 2037/38) that would imply an annual average of 1,849 dwellings.</p> <p>However, we note in para. 72 the following statement:</p> <p>Accordingly, the 5-year target from the anticipated start date of the plan in 2023/24 – is 11,060 and the 15-year target is 27,730 net housing completions. This is equivalent to 1,667 net completions p.a. plus additional completions during the first five years to cater for the current backlog (462 p.a.) and to provide a 5% buffer (83 p.a.).</p>	<p>meeting the housing target that has been set by the London Plan. The Council notes that the representation supports this approach and highlights that it has been taken by other London boroughs in their recent local plans, and that the approach will significantly boost housing delivery. The Council considers that this approach is sound and in accordance with national planning policy. The Council notes and highlights that this response contrasts with the Greater London Authority who appear to suggest that this may be a matter of soundness.</p> <p>Monitoring The Council notes the respondent’s suggestion that the new Local Plan be modified to identify an annual average housing target figure for monitoring purposes. This suggestion is unsound as the consequential annualised figure is not in itself a target – due to it being a conflation of the London Plan target and national objectively assessed need calculation.</p> <p>The new Local Plan Policy HO 01 clearly sets out the baseline housing objectives for the plan period. The Council maintains that these can and will be reported upon through the annual Authority Monitoring Report, Five Year Housing Land Supply Statement and the Housing Delivery Test.</p> <p>The respondent’s “arithmetic” is noted.</p> <p>Meeting Affordable Needs The Council considers that its plan-making role is to intervene in a failing housing market. That remains a fundamental objective of our national planning system. The Council notes that the current Government continually states that the housing market is broken. It is further noted that the Government has recently placed some of that burden and responsibility upon the industry itself.</p>	

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							<p>Following this explanation, our arithmetic arrives at a different figure:</p> <p>1,667dpa Plus backlog – 462pa divided over 15 years = 31dpa (rounded-up) Sub-total = 1,698dpa Plus 5% buffer = 85dpa (rounded-up) Grand total = 1,783.</p> <p>This is lower than the annual average figure suggested by dividing the total requirement of 27,730 by 15 (years).</p> <p>It would be helpful if the Council defined the annual average housing requirement figure in the plan, including any allowances made for backlog and buffer. We do not necessarily disagree with the Council’s approach, but it is important for monitoring purposes to be clear what the annual average housing requirement figure will be for the calculation of the five-year housing supply (although this may disappear) and the Housing Delivery Test.</p> <p><u>Part C is unsound because it is unjustified.</u></p> <p>We note the wording:</p> <p>“with priority given to genuinely affordable housing”</p> <p>We consider that it is the Council’s role, through its local plan, to stipulate the requirements for affordable housing, including the tenure of the affordable homes, and the tenure(s) that the Council considers are ‘genuinely’ affordable. So long as the applicant conforms to this, that is all that should be required. The Council cannot look upon certain applications more favourably, and prioritise these, if these provide more of type of tenure that the Council favours, but which is not defined in policy.</p> <p>We recommend that the Council states clearly its tenure requirements for affordable housing.</p> <p><u>Part E is unsound because it is contrary to national policy.</u></p> <p>The first part of Part E states:</p> <p>Development proposals must deliver an appropriate mix of housing within the site and local area. The appropriate mix should be established on a case-by-case basis having regard to</p>	<p>Evidence clearly demonstrates that the market is failing to provide genuinely affordable new homes to meet local needs across Lewisham. Consequently, a policy that prioritises development proposals that meet those acute needs is both reasonable and justified.</p> <p>Delivering an Appropriate Mix of Housing The Council notes that the representation suggests that the new Local Plan Policy HO 01 is contrary to national planning policy. The Council suggests that NPPF Paras 15 – 20 are relevant when considering this representation. Whilst the respondents suggests that the new Local Plan Policy HO 01 E is ambiguous because of the requirement to assess appropriate mix on a proposal-by-proposal basis this is not the case. There are many established site/ proposal specific factors that influence and inform individual proposals – for example site conditions and viability. These factors will influence a proposals ability to deliver an appropriate mix and it is entirely correct that decision-taking considers them. Consequently, it is unclear how this approach leaves development partners “guessing” any more than other similar Local Plan requirements that allow for the consideration of site-specific factors through negotiation. For these reasons the Council consider the wording of new Local Plan Policy HO 01 E remains sound.</p> <p>First Homes The Council notes the comment in relation to this matter. First Homes, like the similar Starter Home product before them are defined by Government as an “affordable” housing product – albeit that they are technically a form of subsidised market housing, which fails to meet the acute needs of those who cannot afford to finance a mortgage. Such products come and go. Consequently, rather than date the new Local Plan by referencing a specific product a strategic approach to</p>	

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							<p>the site's location and character, the nature and scale of development proposed...</p> <p>This is unsound. It is the function of the local plan to set out the local authority's requirements for development. To expect otherwise, and to determine what is required on a 'case-by-case' basis, would, we submit, be contrary to planning law and policy. Development should be approved in accordance with the development plan.</p> <p>Paragraph 16 of the NPPF, part d) states that local plans should:</p> <p><i>contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</i></p> <p>The applicant should not be placed in the position of trying to guess how to comply with a policy to satisfy the Council. The Council should make its requirements clear in the local plan.</p> <p><u>Part G is unsound because it is contrary to national policy.</u></p> <p>We note that the Council has not referred to the government's policy for First Homes as an element of the affordable housing mix. We suggest that the Council makes provision for this as an affordable housing product.</p> <p><u>Part F is unsound because it is unjustified and conflicts with London Plan policy.</u></p> <p>Part F (a) is unnecessarily restrictive in terms of the location of studio and one-bed flats. We are concerned that the Council may restrict the supply of studio and one-bed flats in locations outside of PTAL 3-6 areas. This could militate against the delivery of some small sites in locations outside of 800m of public transport nodes and town centre boundaries.</p> <p>While London Plan favours the supply of homes on small sites within PTAL 3-6 areas, it does not prohibit this entirely. See para. 4.2.4 of the London Plan. The incremental intensification of areas within PTAL 3-6 or 800m of a station or town centre boundary is <i>expected</i> to play an important part in increasing the supply of homes from small sites, it is not meant to stop other sites in locations outside of these criteria.</p> <p>In the interests of supporting the strategic priority of the London Plan to improve the supply of homes from small sites, this restriction should be deleted.</p>	<p>affordability has been taken. This approach does not conflict with national planning policy as First Home products can still come forward for consideration as component parts of development proposal.</p> <p>Studio and One Bed Flats The Council notes the comments made in relation to this matter. It is unclear why the respondent believes the policy unjustified as no alternative evidence is presented for consideration.</p> <p>Contrary to the respondent's suggestion the new Local Plan Policy HO 01 F provides considerable flexibility for development partners to present evidence that justifies the delivery of Studio and One Bed Flats. The Council considers that this approach provides development partners with opportunities to demonstrate changing on-the-ground conditions (through their supporting evidence) that could justify delivery. The Council considers this approach to be effective.</p> <p>Contrary to the respondent's suggestions compliance with the London Plan is neither a legal requirement nor a matter of soundness. The test is that the new Local Plan be in general conformity. As such the Council can, where it is demonstrably justified, seek to depart from London Plan policy. It is noted that the Greater London Authority has not raised this as a matter of general conformity.</p> <p>Housing Choice The Council notes the comments made in relation to this matter.</p> <p>Contrary to the respondent's suggestions compliance with the London is neither a legal requirement nor a matter of soundness. As such the Council can, where it is demonstrably justified, seek to depart from London Plan policy. It is noted that</p>	

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							<p><u>Part G (e) is unsound because it is contrary to the London Plan.</u></p> <p>The Council encourages applicants to market new homes for sale to local residents or those with a local connection.</p> <p>The Mayor considers that London is a single housing market area. Therefore, a home built in Lewisham could meet the need of someone living in Hillingdon or Bromley. To require this could militate against housing supply in London, and London as an inter-twined housing market.</p> <p>Second, the Mayor, working with the HBF, introduced several years ago a scheme whereby house builders are required to market homes exclusively to Londoners for three months before they can be advertised for sale elsewhere. These homes are advertised on the GLA's Homes for Londoners website. This is the Mayor's 'First-Dibs' scheme – a manifesto commitment. We consider that this is sufficient. Many housebuilders do choose to market to local people first, and this is something that the Council could work with housebuilders to encourage more, but it is not appropriate as a local plan policy since it would conflict with the Mayor's conception of London as a single housing market area.</p>	<p>the Greater London Authority has not raised this as a matter of general conformity.</p> <p>It is equally unclear how an approach that "encourages" development partners to market their products to the Borough residents and communities is in any way unreasonable or indeed a matter of soundness. The Council considers it surprising that the respondent believes it client organisation will shy-away from marketing their products to local markets/ customers.</p>	
CON088	REP465	Home Builders Federation			2	HO 02	<p>HO2 Optimising the use of small housing sites</p> <p><u>The policy is unsound because it is ineffective.</u></p> <p>In the main, the policy will help to support the supply of more homes on small sites, as encouraged by the NPPF and the London Plan. Also, we commend the ambition of the Council to increase the delivery of small sites above the historic level for Lewisham (para. 7.15). The effectiveness of the Local plan is supporting residential delivery via small sites could be strengthened further if the amendments we have argued for in relation to Policy OL1 Delivering an Open Lewisham (spatial strategy) are made. We consider that this change is necessary because Part C of Policy HO2 states:</p> <p>C Development proposals for housing on small sites will only be supported where they help to facilitate the delivery of the spatial strategy for the Borough and:</p> <p>a. Are appropriately located for residential use;</p> <p>If the wording of Policy OL1 steers development towards the growth nodes and regeneration areas (and similar), this could be read as directing residential development away from certain established residential areas that are outside these designated</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy HO 02 Optimising the use of small housing sites.</p> <p>Locations for Small Site Opportunities The suggestion that the policy is ineffective and prevents small sites located in "certain established residential areas" is noted and discounted. The new Local Plan Policy HO 02 wording is clear in stating –</p> <p><i>"The development of small sites will play an important role in increasing housing supply in Lewisham and supporting provision for a wide range of high quality and affordable homes."</i></p> <p>For clarity, contrary to the representation the policy does not restrict or constrain locations where small site opportunities could come forward. The Council considers that the wording this is clear in that respect. Furthermore, Figure 7.1 Small Sites Housing Opportunities clearly</p>	No further action required in relation to the new Local Plan.

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							<p>areas. Para. 7.17 of the Lewisham Local Plan states that the aim is to increase the supply of homes in ‘established residential areas’ via the process of ‘incremental intensification’ – reflecting the London Plan – but Policy OL1 could be read as excluding some areas. Reflecting the aim of the London Plan, we consider that all residential areas should be able to contribute, subject to design requirements and questions of public open space provision etc.</p> <p>Figure 7.1 is very helpful and demonstrates that nearly all areas of the borough fall within the parameters set by the London Plan (PTAL 3-6 and 800m of district centre boundaries) where incremental densification is most likely to occur. Although a few patches of the borough are, these should not be a reason to refuse to consider applications. Even these areas are well connected in terms of public transport opportunities, such as bus routes.</p> <p>Policies OL1 and HO2 should be amended to make it clear that all established residential areas should be able to make a contribution to the supply of homes through small sites.</p> <p>Part C h) could prove also a barrier to the delivery of small sites. Part C h) states:</p> <p>h. Do not prejudice the delivery of site allocations in the Local Plan.</p> <p>It would be helpful if the policy was more specific. We assume the aim of this is to prevent the piecemeal development of allocations through a series of small sites applications. It would be helpful if the Council explained its reasoning here. We are concerned that the policy might be interpreted as a reason to refuse a small site if the small site is located <u>near to</u> an allocation either because this provides some competition in the market for the sale of dwellings, or because the small site might impose visually on a plan or design for an allocation. Neither reason would be acceptable reasons in planning to refuse applications that would be suitable (e.g., policy compliant) in all other respects.</p> <p><u>Assisting in the delivery of small sites</u></p> <p>The Council is aware that national planning policy expects plan-makers to identify through the local plan and brownfield register land sufficient to accommodate 10% of the housing requirement on sites of one hectare or less in size (NPPF, para.69). The London Plan adopts a different approach,</p>	<p>shows where such opportunities could arise.</p> <p>Prejudice Delivery of Site Allocations The comments made with specific reference to Policy HO 02 C h are noted. Contrary to the respondent’s comments, it is entirely a reasonable requirement that speculative proposals (in this case sites) be managed to ensure that they do not adversely impact upon strategically import site allocations.</p> <p>The Council expresses its surprise that the Home Builders’ Federation are implying that it is acceptable that the successful delivery and place-making of their members interests be prejudiced by neighbouring speculative developments.</p> <p>The new Local Plan’s master planning and design-led approaches provide development partners with a mechanism to consider and manage such matters positively. For these reasons, the Council consider the Plan sound.</p> <p>Assisting in the delivery of small sites The Council notes the comments and observations made in relation to this matter.</p>	

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							<p>whereby through its assessment of capacity it expects 12,000 homes a year across London as a whole will be delivered on sites of a quarter of a hectare in size or less. What both national policy and the London Plan have in common, however, is an expectation that plan-makers will identify and allocate some small sites, and not to rely wholly on a windfall assumption.</p> <p>National policy requires 10% of the housing requirement to be provided on allocated sites or sites identified in the brownfield register. For the Lewisham Local Plan this would equate to 2,773 homes (10% of the overall requirement for 27,730 homes).</p> <p>The Council has made great efforts to comply with national and London Plan policy. This is a great strength. As set-out in Part Five of the Local Plan many sites of one hectare or less have been allocated (the italicised sites). Many of these will contribute to the 15-year plan period.</p> <p>In terms of allocated sites of 0.25ha in size or less – the London Plan definition – there are many of these too, although a specific sub-total is not provided. The Council relies partly on windfall mechanism to secure small site supply – providing 7,151 homes over 20-years, but not wholly so. Many allocations have also been made. This complies with Part B 3) of Policy H2 of the London Plan observes, among other things, observes that local authorities should:</p> <p>3) identify and allocate appropriate small sites for residential development</p> <p>We note the statement in Table 20.5: 3,379 or 12% of the 15 year target (27,730) will be provided on site allocations and other large consented sites of 1 hectare or less. This rises to 9,064 (33%) if small site windfalls are taken into account.</p> <p>This indicates that the Council has satisfied national policy and London Plan policy in connection with supporting housing supply through small sites.</p>		
CON088	REP466	Home Builders Federation			2	HO 03	<p>HO3 Genuinely affordable housing</p> <p><u>Part E of the policy is unsound as it conflicts with national policy.</u></p> <p>Para. 65 of the NPPF expects that major developments should provide 10% of the total homes to be available for affordable home ownership. Subsection b of Part E would preclude this. We assume that the Council is reflecting London Plan policy.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy HO 03 Genuinely Affordable Housing.</p> <p>For clarity, the need for new genuinely affordable housing provision in Lewisham is acute – being greater than the need for new market housing. The Council is</p>	No further action required in relation to the new Local Plan.

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							<p><u>Part J is unsound because it is contrary to national policy.</u></p> <p>Part J seeks affordable housing from developments of 2-9 homes. This is contrary to para. 64 of the NPPF. Also, there is no direct policy support in the London Plan for seeking planning obligations for affordable housing from minor developments (10 units or fewer) – there had been in the draft version at policy H2, but this was removed to ensure the London Plan was in conformity with national policy. However, Policy H4, footnote 50 does say that local authorities may consider seeking affordable housing from minor developments.</p> <p>HBF considers Lambeth’s intention to levy affordable housing obligations from minor developments to be unsound. This is because it is unjustified in the context of the strategic importance in London of increasing the supply of homes from small sites. The London Plan requires the delivery of homes on small sites amounting 12,000dpa a year for London – 23% of the overall housing requirement for London of 52,000dpa. Increasing small sites delivery, consequently, is a matter of strategic importance for London.</p> <p>The purpose of the change to national policy introduced by Government in November 2014 (and subsequently embedded in NPPF 2019 and subsequent editions) was to help encourage more small and medium developers to establish themselves and grow, diversifying the market, and increasing the supply of homes from small sites by removing the obstacles to securing planning permission. Evidence from the housebuilding sector is negotiating planning obligations, especially for affordable housing, causes major delays. Recent research by Lichfields (<i>Small sites: Unlocking Housing Delivery, September 2020</i>) observes that it takes an average of 71 weeks for developers of small sites to complete affordable housing negotiations and secure planning permission where the policy on tenure mix is complex. Where policy on affordable housing is less complex it still takes 56 weeks. By comparison, the statutory timetable for the determination of applications is 8 and 13 weeks.</p> <p>A recent report published by the HBF in conjunction with Travis Perkins and Close Brothers, on the situation of SME housebuilders found that:</p> <ul style="list-style-type: none"> • 93% of respondents cited delays in securing planning permission or discharging conditions as a major barrier to growth • 92% of respondents aid a lack of resources in Local Planning Authorities (LPAs) was a major barrier to growth 	<p>committed to meeting that need and accepts that the delivery of new housing (n its totality) provides an appropriate mechanism (among others) for securing new genuinely affordable housing.</p> <p>Contrary to the respondent’s claims, local planning authorities can seek a departure from national planning policy where circumstances justify such an intervention. The development industry inability to respond to this specific area of need across Lewisham provides a justification for these interventions.</p> <p>Furthermore, the approach has been tested through the plan-level viability process, with the conclusion that the policy does not endanger growth. Contrary to popular misconceptions, the Council (acting as a registered provider) is prepared to accept from small site developments either on-site provision or contributions in lieu. For these reasons, the Council concludes the policy is sound.</p> <p>The further comment made in relation to the vacant building credit is noted and discounted. For clarity, the NPPF Paragraph 64 states –</p> <p><i>“To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.”</i></p> <p>For this reason, the Council maintains that the policy remains sound.</p>	

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							<p>In London, affordable housing policy is now extremely complex, with many moving parts. Mayoral policy on affordable housing is very detailed and local plan policy is often equally detailed and contradictory. Mayoral and local policy jockey with each other for precedence. It is extremely difficult for applicants to navigate this complex planning landscape.</p> <p>For these reasons the Lewisham Local Plan should observe national policy and not seek affordable housing obligations from schemes of 10 units or fewer.</p> <p><u>Part M is contrary to national policy.</u></p> <p>Part M disapplies the Vacant Building Credit (VBC) in Lewisham. This is contrary to national policy. The Mayor of London had attempted to disapply the VBC across London as a whole through the London Plan, but this was deemed unsound.</p> <p>We see no justification for disapplying the VBC in Lewisham. Scarcity of land supply is no greater in Lewisham, as for other constrained cities like Brighton, Bristol and Birmingham which have considerable unmet housing needs, yet have not dis-applied the VBC. The purpose of the VBC is to try and incentivise the re-development of brownfield sites by making development more viable.</p> <p>In view of the following:</p> <p>a) the extent of the housing need in London – 52,000 homes a year; b) the scale of the unmet housing need across London – the difference between assessed need and capacity - 12,000dpa; and c) the undersupply of homes in London relative to need over the last five years, failing to match the London Plan requirement for 52,000 homes a year in the last three years since the London Plan was adopted</p> <p>the dis-application of the VBC is unjustified.</p>		
CON088	REP467	Home Builders Federation			2	HO 05	<p>HO5 Accommodation for older people</p> <p><u>The policy is unsound because it conflicts with the London Plan.</u></p> <p>We note paragraph 2.4 in the Local Plan which observes:</p>	<p>The comments and observation made in relation to the new Local Plan Policy HO 05 Accommodation for Older People are noted.</p> <p>The Council does not consider the issues raised to be a matter of soundness –</p>	No further action required in relation to the new Local Plan.

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							<p>Lewisham has a relatively young population. One-quarter of residents were less than 20 years old at the time of the 2011 Census. However older people are the fastest growing demographic group in London. The number and proportion of people aged 65 or more is expected to rise sharply over the next decades, including in Lewisham.</p> <p>We note this statement at para. 7.46:</p> <p>The number of people in the Borough aged 65 and over is forecast to rise by 71.5 per cent over the plan period,</p> <p>Increasing the supply of homes for older people is a strategic priority for the London Plan. For this reason, the Mayor has undertaken an assessment of the likely number of units of specialist older persons accommodation that will need to be supplied by each borough for the period 2017 to 2029. The Mayor's approach is explained in Policy H13 of the London; supported by Table 4.3. Table 4.3 establishes annual borough benchmarks for specialist older persons housing for the period 2017-2029. The figure for Lewisham is 100 units per year. These are not mandatory, but an indicator of the level of supply needed to address the need of older people. Policy H13 advises that the London boroughs should aim to increase the supply of older persons accommodation with reference to these benchmarks. Moreover, as supporting para. 4.13.4 explains, the policy is designed to support an increase in the supply of 'specialist older person housing' rather than care home accommodation (which should be planned for separately); the two should not be conflated.</p> <p>Lewisham Local Plan Policy HO5 should be amended to refer to the London Plan benchmark figure, and it should be amended to clarify that the 100 units benchmark target applies to specialist older persons housing that is not care home accommodation.</p> <p>We note para. 7.48 of the Local Plan. This refers to a locally derived assessment of need for C3 specialist older persons accommodation. This identifies a need for 98 such units of accommodation. The Plan says this is comparable to the London Plan figure. It is the HBF's view that the London Plan figure is the one that should be referenced because, as with the assessment of general needs housing, the Mayor undertakes this on behalf of all the London boroughs, treating London as a single housing market area. For consistency, and to ensure that every borough is making a proper contribution to meeting the need for this type of accommodation, the benchmark figures in Table 4.3</p>	<p>indeed, for clarity, neither does the Mayor/ Greater London Authority.</p> <p>As stated by the respondent themselves, the figures identified in the London Plan are not mandatory. Nevertheless, the London Plan is part of the development plan for Lewisham and as such is already a material consideration for the purpose of decision-taking. It is unnecessary for the new Local Plan to slavishly reproduce the London Plan in its entirety – the requirement is for general conformity. For these reasons, the Council considers the policy sound.</p>	

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							should be used. If the Council is going to use its own locally-derived figure of 93 units of C3 accommodation for older people, then it should refer to this figure in Policy HO5.		
CON088	REP468	Home Builders Federation			2	SD 10	<p>SD10 Water supply and wastewater</p> <p><u>Part B is unsound because it is unjustified.</u></p> <p>Part B commences by stating:</p> <p>Development proposals should have regard to Drainage and Wastewater Management Plans (DWMPs) and must demonstrate that the local water supply and public sewerage networks have adequate capacity both on and off-site to serve demand arising from the development</p> <p>This confuses the regulatory responsibilities. The supply of water and treatment of wastewater is the responsibility of Thames Water and the Environment Agency. It is the Environment Agency that assesses the capacity for water supply and wastewater treatment, and the resulting Water Resource Management Plan is approved by Defra. If there is a question about the adequacy of water supply and wastewater treatment, then that is a matter for the Environment Agency to declare. This is not a matter for the applicant to resolve.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy SD 10 Water Supply and Wastewater.</p> <p>The suggestion that the policy is unjustified is noted. For clarity, the new Local Plan Policy SD 10 Water Supply and Wastewater is supported by both the Environment Agency and Thames Water.</p> <p>The Council considers the highlighted requirement that proposals demonstrate that the local water supply and public sewerage networks have adequate capacity to serve demand to be entirely reasonable. The Council considers it surprising that the Home Builders' Federation appear to suggest that it is acceptable for their members to deliver housing products that are not adequately served by water supply and wastewater infrastructure networks.</p> <p>The Council considers this policy sound.</p>	No further action required in relation to the new Local Plan.
CON089	REP469	Maddox Planning			2	HO 03	<p>Please acknowledge this email as a response to the consultation on the emerging Lewisham Local Plan.</p> <p>Our comments relate to Policy HO3 – Genuinely Affordable Housing.</p> <p>We support the Council's objective of delivering affordable dwellings; however, raise objection to the inclusion of an affordable housing requirement on small sites (minor developments). Policy HO3 (j) refers to development proposals between 2 and 9 dwellings units making provision for affordable housing through off-site financial contributions; however, this is likely to result in development proposals on such sites becoming unviable.</p> <p>Furthermore, the inclusion of the abovementioned policy will be contrary to Paragraph 64 of the National Planning Policy Framework which sets out that the <i>"provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas"</i>.</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy HO 03 Genuinely Affordable Housing.</p> <p>The Council notes the comment that the new Local Plan Policy HO 03 approach towards secure housing from small sites is contrary to national planning policy (NPPF Para 64).</p> <p>However, for clarity the Council notes that NPPF Para 64 states that <i>"Provision of affordable housing should not be sought for residential developments that are not major developments..."</i>. Whilst national planning policy places an advisory "should not", it does not state that planning authorities "must not", which is a much stronger and definitive instruction. The Council notes that there is significant case</p>	No further action required in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							On the basis of the above, Policy HO3(j) should be removed from emerging Local Plan.	<p>law relating to the application of the advisory “should not”, which allows for the consideration of exceptions in circumstances where they are justified.</p> <p>The Council highlights that the need for new genuinely affordable housing across the Borough is acute. When further considered within the context of evidenced local housing land supply the Council considers it is legitimate that all sources of possible supply for new genuinely affordable provision be considered.</p> <p>Furthermore, technical evidence on development viability demonstrates that residential developments coming forward on small sites will not be rendered unviable by delivering or contributing towards meeting genuine affordable housing provision. It is also noted that the new Local Plan Policy HO 03 provides development partners with an opportunity to demonstrate the feasibility of on-site delivery. For these reasons the Council maintains that the new Local Plan is sound.</p>	
CON090	REP470	Skillcrown Homes Ltd			2	HO 03	<p>We write on behalf of Skillcrown Homes Ltd in respect of the consultation on the Submission Version of the Lewisham Local Plan.</p> <p>Our comment relates to draft Policy HO3 Part J. This seeks an affordable housing provision on schemes of between two and nine homes, with the priority being on site. We have two concerns with this policy in terms of its ‘soundness’:</p> <ol style="list-style-type: none"> 1. The proposed policy is not consistent with National Policy. Paragraph 64 of the NPPF (2021) states that the “...Provision of affordable housing should not be sought for residential developments that are not major developments...”. Major developments comprise schemes of 10 homes or more. On this basis we do not consider that the Council should be pursuing affordable housing requirements on minor developments (namely less than 10 homes). 2. Regardless of the point made above, the provision of low levels of on-site affordable housing is unrealistic. Affordable Housing Registered Providers will often not 	<p>The Council notes the comments made in relation to the new Local Plan Policy HO 03 Genuinely Affordable Housing; specifically, the suggestion that the approach towards securing housing from small sites is contrary to national planning policy (NPPF Para 64).</p> <p>However, for clarity the Council notes that NPPF Para 64 states that “Provision of affordable housing should not be sought for residential developments that are not major developments...”. Whilst national planning policy places an advisory “should not”, it does not state that planning authorities “must not”, which is a much stronger and definitive instruction. The Council notes that there is significant case law relating to the application of the advisory “should not”, which allows for the consideration of exceptions in circumstances where they are justified.</p>	No further action required in relation to the new Local Plan.

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							<p>be willing to take on small amounts of on-site affordable housing due to the increased management costs and resources associated with smaller on-site provision and a lack of economies of scale. Therefore, we consider that, based on this point, the policy is neither Justified nor Effective.</p> <p>We would be grateful if you could confirm receipt of these comments and that they will be considered by the Council as the draft Local Plan progresses towards adoption.</p>	<p>The Council highlights that the need for new genuinely affordable housing across the Borough is acute. When further considered within the context of evidenced local housing land supply the Council considers it is legitimate that all sources of possible supply for new genuinely affordable provision be considered.</p> <p>Furthermore, technical evidence on development viability demonstrates that residential developments coming forward on small sites will not be rendered unviable by delivering or contributing towards meeting genuine affordable housing provision. It is also noted that the new Local Plan Policy HO 03 provides development partners with an opportunity to demonstrate the feasibility of on-site delivery.</p> <p>The Council notes the suggestion that the approach is “unrealistic” as registered providers may be unwilling to take-on single or small amounts of provision for operational reasons. The Council acknowledges that such circumstances may exist – however, the scale of demand for new provision in Lewisham is o great that registered providers (particularly the Council itself) are more likely to adjust their operational practices to accommodate provision. In addition, it is highlighted again that the policy provides development partners the opportunity to demonstrate the feasibility of on-site provision and negotiate a proportionate in-lieu contribution. The Council considers this to be effective.</p> <p>For these reasons the Council maintains that the new Local Plan is sound.</p>	
CON091	REP471	McCarthy Stone			2	HO 01	<p>RESPONSE ON BEHALF OF MCCARTHY STONE TO THE LEWISHAM LOCAL PLAN PROPOSED SUBMISSION DRAFT REGULATION 19 CONSULTATION</p>	<p>The Council notes and welcomes the support offered by McCarthy Stone in relation to the new Local Plan Policy HO 01 Meeting Lewisham’s housing needs.</p>	<p>No further actions required in relation to the new Local Plan.</p>

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
							<p>Thank you for the opportunity to comment on the Lewisham Local Plan proposed submission draft Regulation 19 consultation. McCarthy Stone is the leading provider of specialist housing for older people including retirement housing and extra care housing.</p> <p>Please find below our comments on the consultation which specifically addresses policies HO1, HO5, HO3, SD3, QD2 and C13.</p> <p>HO1 Meeting Lewisham's housing needs We support point G b. of policy HO1 that supports development proposals that meet the needs of specific groups including families with children, older people, people with disabilities, students and vulnerable people.</p>		
CON091	REP472	McCarthy Stone			2	HO 05	<p>HO5 Accommodation for older people Thank you for the opportunity to comment on the Lewisham Local Plan proposed submission document regulation 19 consultation. McCarthy Stone is the leading provider of specialist housing for older people in the UK.</p> <p>Policy HO5 sets out a detailed policy aiming to meet the large older persons housing need that exists in the borough. Whilst we support the sentiment of the policy, we have the following comments and recommended amendments to make.</p> <p>Policy HO5 point A Policy HO5 point A states: 'The housing needs of older people will be met mainly through conventional residential accommodation in the C3 Use Class that is designed in a way that allows for easy adaptation to the different needs of users over their lifetime. This includes new build development and the appropriate retrofitting of housing units. Specialist older person's accommodation and care home accommodation should supplement conventional housing to meet the needs of Lewisham's older resident population'.</p> <p>This view is confirmed in para 7.47 that states: 'Local needs for older persons accommodation should be met principally through conventional housing'.</p> <p>We note that para 7.48 of the Proposed Submission document states: 'The total additional need for specialist older person dwellings across Lewisham is projected to be 2,422 by 2040. This is broken down to 1,969 units of Class C3 units (such as sheltered or extra care housing) and 453 units of Class C2 units (such as residential care). This translates to an annual need for 98 C3 dwellings plus 23 units of C2 dwellings each year, which is comparable to the London Plan benchmark for Lewisham of</p>	<p>The Council notes the comments made in respect of the new Local Plan Policy HO 05 Accommodation for older people. The stated broad level of support for the policy is noted.</p> <p>The Council notes that the respondent claims to be very concerned about the new Local Plan's for meeting the housing needs of the Borough's aging population. Specifically, the Council highlights the respondents concern that these needs will primarily be met through the long-term adaptability of conventional residential accommodation – rather than the provision and proliferation of the wide variety of specialised older person housing products. The Council is aware of and notes the type of product provided by the respondent.</p> <p>The Council considers that this approach is sound as it not only secures long-term flexibility within the Borough's housing stock, that will allow for inevitable changes in demographics, but also provides choice in the market. Providing residents with the opportunity to stay in their homes, across their lifetime, secures other benefits – inclusive to their individual health and well-being and the Borough's wider socio-economic fabric.</p>	No further actions required in relation to the new Local Plan.

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							<p>100 specialist older person dwellings 2017 to 2029'. This evidence is referenced as being from the Lewisham SHMA (2022), Arc4.</p> <p>The Council is promoting, through point A of policy HO5, to meet the housing needs of older people predominantly through conventional housing that is designed to be adaptable. Whilst we acknowledge that PPG Paragraph 003 Reference ID: 63-003-20190626 recognises that: "the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support', given the need for specialist older persons housing identified at para 7.48, McCarthy Stone is very concerned with the Council's approach and we are firmly of the view that ensuring that residents have the ability to stay in their homes for longer is not, by itself, an appropriate manner of meeting the housing needs of older people.</p> <p>Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year. A more supportive local planning policy framework beyond conventional housing will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable housing can assist in meeting the needs of older people it does not remove the need for specific older persons' housing. Housing particularly built to M4(3) standard may serve to institutionalise an older persons scheme reducing independence contrary to the ethos of older persons. We therefore recommend that point A is amended as follows:</p> <p>A The housing needs of older people will be met mainly through <u>a combination</u> of conventional residential accommodation in the C3 Use Class that is designed in a way that allows for easy adaptation to the different needs of users over their lifetime. This includes new build development and the appropriate retrofitting of housing units. <u>and Specialist older person's accommodation and care home accommodation should</u></p>	<p>The Council acknowledges that there will be a need for highly specialised older person accommodation that genuinely provide the higher levels of care referenced in the respondent's comments. The Council considers that the new Local Plan is sufficiently flexible enough to consider such proposals where they are demonstrably necessary.</p>	

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							<p>supplement conventional housing to meet the needs of Lewisham's older resident population</p> <p>Policy HO5 point B Point B of the policy requires proposals delivering specialist older persons accommodation to meet a number of requirements in order to be supported. Policy HO5 point B a. requires proposals to respond positively to objectives in the Lewisham Housing Strategy. Government's policy, as set out in the revised NPPF, is to boost significantly, the supply of housing. Paragraph 60 reads: "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."</p> <p>The revised NPPF looks at delivering a sufficient supply of homes, Paragraph 62 identifies within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people. In June 2019, the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001 Reference ID: 63-001-20190626 states:</p> <p>"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking" (emphasis added) Paragraph 003 Reference ID: 63-003-20190626 recognises that: "the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support." Thus, a range of provision needs to be planned for. Paragraph 006</p>		

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							<p>Reference ID: 63-006-20190626 sets out; “planmaking authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.”</p> <p>The Lewisham Housing Strategy 2020-2026 under priority 2 and priority 4 identifies that specialist housing to meet the needs of older people is required. Para 7.48 as detailed above identifies that 98 specialist houses to meet the needs of older people should be delivered per annum. This is a substantial amount of older person’s housing need and for the plan to be in accordance with The Lewisham Housing Strategy and PPG we feel that proposals for specialist housing to meet the needs of older people should not have to identify how they are responding to the objectives in the Lewisham Housing Strategy. Point a should therefore be deleted.</p> <p>Recommendation: In order to make the plan consistent with national policy and justified we recommend that point A is amended as follows:</p> <p>A The housing needs of older people will be met mainly through a combination of conventional residential accommodation in the C3 Use Class that is designed in a way that allows for easy adaptation to the different needs of users over their lifetime. This includes new build development and the appropriate retrofitting of housing units. and Specialist older person’s accommodation and care home accommodation should supplement conventional housing to meet the needs of Lewisham’s older resident population</p> <p>And that point B a. is deleted. Development proposals for specialist older persons accommodation will only be supported where they: a. Respond positively to the objectives in Lewisham’s Housing Strategy;</p>		
CON091	REP473	McCarthy Stone			2	HO 03	<p>HO3 Genuinely affordable housing HO3 Genuinely affordable housing – overall Thank you for the opportunity to comment on Lewisham Local Plan proposed submission document regulation 19 consultation. McCarthy Stone is the leading provider of specialist housing for older people in the UK.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy HO 03 Genuinely affordable housing. Specifically in relation Parts H and M.</p> <p>The Council highlights that the need for genuinely affordable new homes in Lewisham is acute. It is the highest area of</p>	No further actions required in relation to the new Local Plan.

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							<p>Affordable Housing requirements in the Lewisham Local Plan Proposed Submission Document are linked to the corresponding policies in the London Plan – namely Policy H4: Delivering affordable housing. This sets a strategic target of 50% of all new homes in London to be ‘genuinely affordable’ with a 35% affordable housing requirement for residential developments that fulfil the requirements of the threshold approach detailed in Policy H5: Threshold approach to applications.</p> <p>Policy HO3 Genuinely Affordable Housing seeks a minimum of 35% affordable housing from all developments of 10 or more dwellings, across the borough, in line with the threshold approach. The wording of Policy HO3 1 and its supporting text makes it clear that a non-policy compliant level of affordable housing will only be allowed in exceptional circumstances stating that:</p> <p>‘7.30 Development proposals that do not provide the minimum required amount of genuinely affordable housing will be strongly resisted. Where applicants consider there are exceptional circumstances affecting the viability of a scheme and delivery of policy objectives, this must be justified through the submission of a detailed Viability Assessment.’</p> <p>It is clear from the wording of the policy and its justification that the Local Authority is aware of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF. However, as such we would like to remind the Council of the emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that “The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan” (Paragraph: 002 Reference ID: 10-002-20190509).</p> <p>In addition, the viability of specialist older persons’ housing is more finely balanced than ‘general needs’ housing and we are strongly of the view that these housing typologies should be robustly assessed. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG on viability which states that: “A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period. If this approach is not</p>	<p>need, outweighing the need for new market housing. As an area of housing need (in Lewisham) it significantly out-numbers the need for specific forms of specialised accommodation.</p> <p>It is a fact that the need for genuinely affordable new homes is felt across all the Borough’s resident age groups. It is highlighted that residents at the statistical extremities (the young and the elderly) will experience affordability most markedly. This is because of their ability (or otherwise) to access necessary finance – in respect of salaries or mortgages. Consequently, the Council finds the respondent’s position, to their customer base, unusual but perhaps not surprising.</p> <p>The Council maintains that the new Local Plan and this specific policy is justified, positively prepared and reasonable. The policy approach is supported by a robust and proportionate evidence base. It is the case that development industry partners can, through the decision-taking process, advance demonstrable market signals that allow for a departure from policy. Review mechanisms, or claw-back arrangements, are an established and proven approach.</p> <p>For clarity, the Council is not seeking to make policy through supplementary documents. Those documents, should they necessary will seek to provide partners with supplementary guidance on how processes will work.</p> <p>In respect of the comments made in relation to the vacant building credit. The Council notes that this mechanism has been subject to abuse – with unscrupulous developers using it to gain an unjustified financial advantage. This has had an adverse impact of compounding the need for genuinely affordable homes.</p>	

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							<p>adhered to, the delivery of much needed specialised housing for older people is likely to be significantly delayed with protracted discussion about other policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need.</p> <p>The affordable housing targets detailed in the above policy are informed by the London Borough of Lewisham: Local Plan Viability Assessment, BNP Paribas, 2022 and the London Plan Viability Study (2017) and its corresponding addendum (2018) undertaken by Three Dragons and Turner & Townsend. The 2022 Study confirms at para 2.43 that: 'For specialist housing for older people (C3 use class), we have tested the impact of London Plan policy H15 B (1) which applies the affordable housing policy approach for general needs housing to this sector'. However, despite this commitment of testing of the older person's typology, it does not appear to have been taken forward through the assessment for example in a similar way that student housing has been. The only other area where older person's housing is discussed is within Table 4.11.1, which looks at BCIS build costs and within para 6.46 which re-confirms the commitment at para 2.43. Therefore, although para 2.43 appears to be making a commitment to testing the older persons typology this does not appear to have occurred other than in the form of a care home, which is a different typology from specialist accommodation for older persons.</p> <p>It may be that older person's housing has been placed into the category: 'Flats – fewer than 6 storeys' as within in the' BCIS build costs' table 4.11.1., the build costs used are the same for flats (fewer than 6 storeys) and older person's housing. However, analysis of BCIS shows that the build costs of 'flats' and 'supported housing' which includes specialist housing for older people is different. Older person's housing schemes typically consist of purpose built or adapted flats or bungalows with care available if required. Residents are able to live independently with 24-hour access to support services and staff and meals are also available. There are often extensive communal areas that may include shared lounges, laundries, staff office or accommodation, buggy storage and in the case of extra care housing, kitchens, dining rooms, function rooms and other services. Older person's typology therefore typically has a considerably larger proportion of non-saleable communal areas than conventional flats with retirement living having a 70-75% saleable area vs gross area and extra care having a 60-65% saleable area vs gross area compared to a non-retirement block, which would typically have a 85% -90% saleable area gross. Proposals for specialist older person's</p>		

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							<p>housing therefore must be appraised assuming considerable communal areas which attract cost, but which return no value and with considerable up-front non saleable cost exposure to developers of this typology. This is just one example of where costs differ from mainstream flats.</p> <p>It is disappointing that no viability appraisals have appeared to have been undertaken for the specialist older persons' housing typologies – namely Sheltered Housing and Extra Care accommodation. This is considered to be contrary to both best practice and the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. "A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.</p> <p>As no viability appraisal has been undertaken for the specialist older persons housing typologies, this would mean that the viability evidence underpinning the 35% affordable housing requirement is solely that carried out during the Examination of the London Plan.</p> <p>The respondents, as part of the Retirement Housing Consortium and as members of the Retirement Housing Group (RHG), have consistently voiced their concerns about the Mayor of London's threshold approach and the viability evidence underpinning this. These concerns were presented during the London Plan EiP, however despite the Examiners acknowledging our concerns the London Plan Examination in Public: Panel Report (October 2019) concluded that:</p> <p>222. 'The threshold requirements for affordable housing have been challenged, on the basis of the higher build costs compared with mainstream housing. This is reflected in the findings of the LPVS, which indicates that viability for sheltered and extra care housing is more difficult in lower value areas. Further the case studies tested for this type of housing in the LPVS do not reflect industry practice. For these reasons, we are not convinced that viability would not hamper delivery. However, in light of the significant need for affordable homes and given that the "viability tested route" is available to assess the impact of viability on affordable housing requirements, it is worth waiting to assess the impact of this new policy approach. However, close monitoring should take place to ensure that the impacts are properly assessed and fed into any review</p>		

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							<p>This 'wait and see' approach does not accord with the increased emphasis for the viability of planning obligations to be tested, robustly, at the Plan making stage. The London Plan was assessed with regard to the policies in the 2012 version of the NPPF, and other relevant policy under the transitional arrangements detailed in NPPF (2019) paragraph 214 and footnote 69. It was not assessed against the revisions to the NPPF and PPG made in 2018, 2019 or 2021.</p> <p>The London Plan's approach, particularly in respect of development viability and affordable housing contributions, is not considered to be consistent with that of the NPPF (2021). While we will not reiterate the point made to the EIP to the London Plan, we remain strongly of the view that the viability assessments for older persons' housing typologies in the London Plan Viability Study were not fit for purpose and substantially overstated the viability of these forms of development.</p> <p>Notwithstanding the respondents concerns with The London Plan Viability Study, we note that the London Plan Viability Study concluded that the viability of older persons' housing was considered to be more finely balanced in Lewisham than some other boroughs with areas falling in Value Band C and D and stated the following at para 14.2.11.</p> <p>Other residential development types 14.2.11 This group of uses includes specialist provision for the elderly and others needing sheltered or extra care facilities and for care homes. It also includes student accommodation and another relatively new form of provision – Shared Living.</p> <p>Generally, all these types of uses are viable and able to provide affordable housing (when required to do so). However, there are considerable differences in viability between the uses. The policy requirements for student accommodation and Shared Living can be met across the value areas. Sheltered housing is able to provide 50% affordable housing in Value Band C, but not in D or E. Extra care, as was tested for this study, was viable with 35% affordable housing in C but not in D or E. (Emphasis own)</p> <p>The need for specialist older persons' housing across Greater London is detailed in Table 4.3 of the London Plan which requires the borough 100 units of specialist older persons' accommodation per annum. The Lewisham Strategic Housing Market Assessment, March 2022, Arc 4, goes on to further assess this need (sheltered and extra care) and identifies at par</p>		

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							<p>6.16 that there is ‘an annual need for 98 C3 dwellings which is part of the overall annual housing need for Lewisham plus 23 units for C2 dwellings each year’.</p> <p>Lewisham’s Annual Monitoring Reports (AMR) (the most recent dated December 2022) does not currently monitor the delivery of specialist older persons’ housing in the borough. The Knight Frank Senior Housing Update 2021 is however a useful reference in this respect and highlights the London Plan target for an additional 4,115 units of specialist older persons’ housing per year across the capital up to 2029. Since the start of the London Plan timeline in 2017 however, only 3,000 seniors housing units have been delivered – less than the requirement for one year. There are a further 1,600 further units either under construction or with planning granted across Greater London, which will do little to address the shortfall.</p> <p>the borough and across Greater London, we consider that it is imperative that the viability of the older person’s housing typology is carefully and robustly assessed against planning obligations and policy requirements of the draft plan to ensure protracted discussions over viability do not further delay the delivery of specialist housing for older people.</p> <p>The PPG makes it clear that ‘Different requirements may be set for different types or location of site or types of development’ (Paragraph: 001 Reference ID: 10-001-20190509). We are strongly of the view that it would be more appropriate to set a lower, potentially nil, affordable housing target for sheltered and extra care accommodation in the borough depending on the outcome of a robust assessment of the viability of this typology.</p> <p>We are of the view that as The London Plan was assessed against the NPPF (2012) and the Lewisham Local Plan Review will be determined against the NPPF (2021) and updated PPG, with its increased emphasis on robust viability assessments at the plan making stage, it is the borough’s responsibility to ensure its planning obligations regime is sufficiently robust and justified in order for the plan to be consistent with national policy and found sound.</p> <p><u>The Local Plan is therefore considered to be unsound on the grounds the affordable housing targets are not justified, positively prepared or effective.</u></p> <p>Recommendation:</p>		

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							<p>The respondents as part of a Retirement Housing Consortium have consistently voiced their concerns about the affordable housing threshold approach and the viability evidence underpinning the London Plan. As the Lewisham Local Plan Review will be determined against the NPPF (2021) and PPG, with its increased emphasis on robust viability assessments at the plan making stage, it is the borough's responsibility to ensure its planning obligations regime is sufficiently robust and justified.</p> <p>The Council must provide additional evidence in the form of a viability assessment of the specialist housing for older people typology that should inform an amended policy HO3. This may, depending on the outcome of the viability work, set a lower, potentially nil, affordable housing target for sheltered and extra care accommodation in the borough. This work should be subject to an additional consultation process of which we would strongly urge that we are expressly consulted on. Without this evidence the proposed Plan is contrary to NPPF para 58 and PPG Paragraph: 002 Reference ID: 10-002-20190509) and Paragraph: 004 (Reference ID: 10-004-20190509) and policy HO3 cannot be justified.</p> <p>All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available. The PPG makes it clear that Local Plan process is a collaborative process stating that 'It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers (Paragraph: 002 Reference ID: 10-002-20190509).</p> <p>HO3 Genuinely affordable housing – point H It is noted that point H of the policy states: 'To maximise affordable housing delivery and address economic uncertainties that may arise over the lifetime of a development proposal the use of 'review mechanisms' will be required, where appropriate, and implemented in line with the Mayor's Affordable Housing and Viability SPG'. Paragraph: 009 Reference ID: 10-009-20190509 of the government guidance on Viability states the following: 'Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure</p>		

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							<p>policy compliance and optimal public benefits through economic cycles. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies.</p> <p>With respect to planning obligations or s106, Para 57 of NPPF states 'Planning obligations must only be sought where they meet all of the following tests 26 :</p> <p>(a) necessary to make the development acceptable in planning terms;</p> <p>(b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development' Para 004 Reference ID: 23b-004-20190901 of the PPG on Planning Obligations identifies where policies on seeking planning obligations should be set out and states:</p> <p>'Policies for planning obligations should be set out in plans and examined in public. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land'.</p> <p>And</p> <p>'It is not appropriate for plan-makers to set out new formulaic approaches to planning obligations in supplementary planning documents or supporting evidence base documents, as these would not be subject to examination.'</p> <p>In order to introduce such a review mechanism, there must be a clear and specific policy basis for any review mechanism being imposed in line with PPG Viability para 009 Reference ID: 10-009-20190509. A significant number of recent Planning Appeals and case law have reinforced this point. A review mechanism that sits within a planning obligation needs to be considered and assessed through the Local Plan process not via an SPD. Such a requirement within a SPD is contrary to paragraph: 004 Reference ID: 23b-004-20190901 of the PPG on Planning Obligations.</p> <p>There must therefore be a reasonable justification for imposing such a review mechanism and this cannot be achieved through a SPD as such a document is not examined in public. <u>The requirement for a review mechanism at point H is not supported by any justification, evidence, or process where specific inputs to be included within any review mechanism, could be considered in public examination.</u> For example, certain exemptions should be introduced such as to smaller sites, that are built in one phase. The Planning Inspectorate have repeatedly noted that review mechanism for smaller</p>		

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							<p>sites, and single-phase developments are unnecessary so this must also be a consideration.</p> <p>Furthermore, it is noted that the London Plan Affordable Housing and Viability SPG, that the Council is using to introduced a review mechanism is dated 2017. The examination into the London Plan was held in the Winter and Spring of 2019. The PPG paragraphs identified above were amended in September 2019 which were after both the SPG and the examination into the London Plan. Therefore, in order to be consistent with national policy and to introduce a review mechanism, there must be a clear and specific policy basis and justification for any such mechanism to be brought in. A significant number of recent Planning Appeals and case law have reinforced this point. A review mechanism and any detail that will form part of it also needs to be considered fully and assessed through the Local Plan process. This should include the consideration of variables such as trigger points, costs, land values, how surplus is split and other definitions. The Plan should also include an exemption from the review mechanism for smaller single phased developments. The Planning Inspectorate have repeatedly noted the review mechanisms are unnecessary for smaller sites, whilst for a large multiphased development that maybe delivered over a long period it would make sense to determine if viability has changed with market movements over time.</p> <p>Recommendation: Point H is deleted from the plan as it is not consistent with national policy or justified or further work is undertaken by the council which is fully consulted upon that identifies the detail of any review mechanism and that can be assessed through the examination in public in order to be consistent with national policy.</p> <p>HO3 Genuinely affordable housing – Point M – Vacant Building Credit – attempts to take away Vacant Building Credit within Lewisham Considering the examinations in public of other London Borough plans, such as Barnet, it is likely that this element of the policy has been introduced to the Local Plan to reflect the Draft London Plan as wording used is very similar (Policy H9 – Vacant Building Credit). However, the London Plan Examination in Public: Panel Report October 2019 recommended (para 236) that this policy be deleted as it was inconsistent with national policy on Vacant Building Credit and that departure from national policy was not justified with sufficient evidence. It does not appear that Lewisham Borough Council have any local evidence to justify departure from</p>		

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							<p>national policy on Vacant Building Credit and therefore Point M should be deleted.</p> <p>Point M should therefore be deleted as it is inconsistent with NPPF para 64 on vacant building credit and a departure from national policy guidance on planning obligations Paragraph: 026 to 028 Reference ID: 23b-026-20190315. No evidence appears to have been published to depart from government policy.</p> <p>Recommendation: Delete policy HO3 point M as it is inconsistent with national policy and not justified.</p> <p>Vacant Building Credit M The application of the Vacant Building Credit (VBC) is not appropriate in Lewisham. The use of VBC will only be considered in limited circumstances, where applicants suitably demonstrate there are exceptional reasons why it is appropriate and the following criteria are met:</p> <p>a. The building is not in use at the time the application is submitted;</p> <p>b. The building is not covered by an extant or recently expired permission;</p> <p>c. The site is not protected for an alternative land use; and</p> <p>d. The building has not been made vacant for the sole purpose of redevelopment, as demonstrated by evidence showing that the building has been vacant for a minimum continuous period of five years and has been actively marketed for at least two years therein, at realistic local area prices.</p>		
CON091	REP474	McCarthy Stone			2	SD 03	<p>SD3 Minimising greenhouse gas emissions</p> <p>Point B of policy SC3 requires major development to be net zero carbon and point B requires developers to 'Calculate and minimise emissions from any part of the development that are not covered by Building Regulations (e.g. unregulated emissions)'. Point C requires proposals that cannot achieve net zero to make a financial contribution or deliver off-site measures to meet any shortfall.</p> <p>Point D encourages the assessment of embodied carbon and maximise opportunities to reduce the emissions.</p> <p>The Council's commitment to meeting its target of net zero carbon emissions and the consideration of embodied carbon from the adoption of the plan is commendable. It appears that the council is going to achieve this through having mandatory standards from adoption of the plan that may go beyond government targets. It is our view that any requirement should be 'stepped' in line with Government targets and the proposed</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy SD 03 Minimising greenhouse gas emissions.</p> <p>For clarity, the new Local Plan Policy SD 03 has been prepared and produced with the London Plan. The Greater London Authority has not challenged the new Local Plan's approach to this matter.</p> <p>For further clarity, the London Plan Paragraph 9.2.1 is clear in stating at that</p> <p><i>"The Mayor is committed to London becoming a zero-carbon city. This will require reduction of all greenhouse gases, of which carbon dioxide is the most prominent.153 London's homes and workplaces are responsible for producing</i></p>	No further actions required in relation to the new Local Plan.

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							<p>changes to the building regulations. This is more desirable as there is considerable momentum from Government in preparing enhanced sustainability standards as it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years. Aligning the Council's requirement for net zero development with those of Government would therefore be pragmatic and more achievable.</p> <p>In addition, the introduction of an embodied carbon policy must not be so inflexible that it deems sites unviable and any future policy needs to ensure this to make sure it is consistent with NPPF/PPG and can be justified by the Council. New development will often be far more sustainable in many circumstances including building fabric by the use of modern methods of construction, but also extending beyond that, such as sustainability through optimisation of use of a site. The council also need to verify that embodied carbon figures are available to developers from suppliers through an 'Environmental Product Declaration' before policies are introduced as in our experience this is not yet readily available from the majority of suppliers.</p> <p>In the Lewisham Local Plan Viability Assessment 2022), BNP Paribas (LPVA) allows for an uplift of between 2.01% to 6.0% of build costs for residential to cover the cost of zero carbon policies with the latter more representative in their experience of bringing development forward.</p> <p>Development typologies where the viability is more finely balanced, such as specialist older persons' housing, will therefore struggle disproportionately to provide the enhanced sustainability standards and affordable housing.</p> <p>Recommendation: <input type="checkbox"/> That the policy is stepped in line with emerging government targets or <input type="checkbox"/> The policy is deleted as Net Zero Carbon development is to be dealt with via the Building Regulations.</p>	<p><i>approximately 78 per cent of its greenhouse gas emissions. If London is to achieve its objective of becoming a zero-carbon city by 2050, new development needs to meet the requirements of this policy."</i></p> <p>For the above reasons, the Council maintains that the policy remains sound.</p>	
CON091	REP475	McCarthy Stone			2	QD 02	<p>QD2 Inclusive and safe design Point D of policy QD2 requires that 'At least 10 per cent of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings'; and for 'all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.</p> <p>The Council should initially recognise that the proposed changes in building regulations will require all homes to be</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 02 Inclusive and safe design.</p> <p>For clarity, the new Local Plan Policy QD 02 has been prepared and produced in conformity with the London Plan – this is set out under the new Local Plan Policy QD 02 supporting text paragraphs 5.13 and</p>	No further actions required in relation to the new Local Plan.

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							<p>built to part M4(2) of the Building Regulations. This will remove the need to reference this in the local plan and should be removed.</p> <p>Whilst we acknowledge that PPG Paragraph 003 Reference ID: 63-003-20190626 recognises that “the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support’, the council should note that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the housing needs of older people.</p> <p>Adaptable houses do not provide the on-site support, care and companionship of specialist older persons’ housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons’ housing and it should be acknowledged that although adaptable housing can assist it does not remove the need for specific older person’s housing. Housing particularly built to M4(3) standard may serve to institutionalise an older persons scheme reducing independence contrary to the ethos of older persons and particularly extra care housing and this should be recognised within the plan.</p> <p>Recommendation: Delete point D of policy QD2 as follows: D To help ensure that housing is designed to meet the varied requirements of Lewisham’s resident population development proposals incorporating new residential units must ensure that: a. At least 10 per cent of dwellings meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’; and b. All other dwellings meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.</p>	<p>5.14. The requirement that “<i>development proposals must contribute to the strategic target for provision of wheelchair user dwellings and ensuring accessible and adaptable dwellings, in accordance with Building Regulations M4(3) and M4(2) respectively, or equivalent standards which may supersede these</i>” – is in accordance with the London Plan.</p> <p>The Council acknowledges that the Building Regulations may, at some future currently unspecified point in time, change to make Part M 4(2) a statutory requirement for all new homes (rather than an optional requirement as it currently remains). However, this has not happened. Consequently, it would be premature and unsound to remove this requirement.</p> <p>It is noted that the capacity for a new home to be designed to be adapted to provide a long-term home-option for residents does not by itself secure all the measures that may be necessary for such provision. Nevertheless, the suggestion that housing designed to meet the access requirements of Part M 4 (3) serves to institutionalise older people and reduces their independence is offensive and unsound.</p> <p>The Council recognises that there is need to provide extra care accommodation but the suggestion/ implication that such provision negates the need for providing accessible accommodation for older people who do not require extra-care is disturbing.</p>	
CON091	REP476	McCarthy Stone			2	CI 03	<p>CI3 Sports, recreation and play</p> <p>Policy CI3 requires development proposals to provide access to a wide range of opportunities for sports, recreation and play.</p> <p>The council should note that open space needs of older people</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy CI 03 Sports, recreation and play.</p>	<p>No further actions required in relation to the new Local Plan.</p>

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							<p>are much less than for mainstream housing. For older people the quality of open space either on site or easily accessible for passive recreation is much more important than formal open space. The Local Plan should provide an exemption for older people's housing schemes to having to provide sports, recreation and play space but consider the quality and function of the amenity space instead so that the amenity space provided is relevant to the occupation.</p> <p>Recommendation:</p> <p><u>Add a new point I 'Older person's housing schemes are exempt from the above requirement so long as high quality amenity space suitable for older people is provided on site'</u></p>	<p>For clarity, the Council considers that the requirement that – <i>“Development proposals should help to ensure that people of all ages and abilities have access to a wide range of opportunities for sports, recreation and play.”</i> Is a key tenet of the new Local Plan policy. The provision of new open space, sports and recreation provision to meet the needs of future residents and communities is an essential part of place-making. It contributes to a wide range place-shaping and social objectives, including high quality design/ places, visual amenity, health and well-being, accessibility, and climate change resilience.</p> <p>Although the Council acknowledges that specific open space needs may vary between different residents and communities, the suggestion that an entire demographic be exempted from benefiting from on-site provision is entirely unsound.</p> <p>The Council highlights that housing accommodation for specific groups may change over-time. Alternatively, the needs of those demographic groups may themselves change overtime. This is particularly the case with housing for older people – with people living and remaining healthy and active for longer. For these reasons, the Council maintains that the policy remains sound.</p>	
CON092	REP477	Watkins Jones Group			2	HO 3	<p>Consultation on the Proposed Submission Lewisham Local Plan – Representations by the Watkin Jones Group</p> <p>Please see below the comments of the Watkin Jones Group PLC (WJG) in relation to proposed submission version of the Lewisham Local Plan.</p> <p>About Watkin Jones Group - With a focus on delivering for our customers since 1791, WJG is the UK's leading developer and manager of residential for rent homes. By spearheading this emerging sector, WJG is creating the future of living for a diverse and growing group of people who want flexibility, convenience, and a strong sense of community alongside the best location and value. Its purpose-built build to rent (BTR,</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy HO 03 Genuinely affordable housing.</p> <p>The Council is committed to meeting the Borough's housing needs through its plan-making and decision-taking responsibilities, and as a housing developer and provider. For clarity, the overwhelming housing need, across Lewisham, continues to be for genuinely affordable homes and then followed by market housing for sale. The Government's overarching objective</p>	No further actions required in relation to the new Local Plan.

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							<p>multifamily), co-living and student homes are designed and built sustainably, and welcome people from all backgrounds to enjoy a great way of life, generating a positive impact for wider communities. Beyond residential for rent, its successful and well established house building division has an increasing focus on the delivery of affordable and BTR single family homes.</p> <p>With increasing pressure on many areas to speedily deliver new housing, WJG has an excellent track record of creating homes fast without compromising on quality. Over 95% of its projects are on site within six months of the grant of planning permission and its in-house construction capacity means that it can rapidly boost housing supply. Over the last 25 years WJG has delivered over 54,000 homes and currently has a £2bn pipeline. In London, WJG has delivered over 5,500 homes since 2010 and has circa 2,000 homes progressing through the planning system. In Lewisham, WJG is delivering 365 BTR and affordable homes at Ravensbourne Place.</p> <p>Today, WJG successfully works across every part of the UK focussing on centrally located, previously developed sites. WJG's end-to-end delivery model means that it acquires, designs, and builds places, and typically remain within communities as on-site building managers.</p> <p>Fresh is our multi award-winning operatorarm, who are currently managing approximately 23,000 rental homes at 72 locations across the UK and Ireland.</p> <p>Fresh achieves 95% customer satisfaction, and cares for our residents with a range of wellbeing and community building activities.</p> <p>Scope of Representations These representations focus on the land use policies in the consultation document relevant to the residential tenures that WJG delivers. As such, this representation focuses primarily on the following policies:</p> <ul style="list-style-type: none"> ☑ Build to Rent (BTR) – Policies HO1 and HO3 ☑ Purpose Built Student Accommodation (PBSA) – Policy HO7 ☑ Co-Living – Policy HO8 <p>These are addressed in turn, along with our proposed recommendations to ensure that the Plan meets the tests of soundness set out in Paragraph 35 of the National Planning Policy Framework (NPPF) – namely, positively prepared, justified, effective and consistent with national policy.</p>	<p>continues to be the creation of opportunities for increased homeownership.</p> <p>For clarity, NPPG states that <i>“Build to rent is a distinct asset class within the private rented sector, and has been defined in the National Planning Policy Framework glossary, in order to simplify its treatment within the planning system... If a need is identified, authorities should include a plan policy setting out their approach to promoting and accommodating build to rent. This should recognise the circumstances and locations where build to rent developments will be encouraged – for example as part of large sites and/or a town-centre regeneration area.”</i> (Paragraph: 001 Reference ID: 60-001-20180913)</p> <p>The Lewisham Strategic Housing Market Assessment (SHMA) 2021/22 Update considers existing provision and possible demand for build to rent products under the parent heading of Private Rented Sector (Paragraph 4.34 onwards). The SHMA considers the possible benefits of build to rent products, provides an assessment of rent values across the Borough, the potential sources of investment, and future demand. The SHMA also notes that build to rent can contribute to trapping households into the private rented sector.</p> <p>The Council maintains that the new Local Plan Policy HO 03 remains sound – being justified, effective, positive prepared and consistent with national planning policy objectives. The policy is in general conformity with the London Plan.</p>	

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							<p>Build to Rent</p> <p>WJG is supportive of the recognition of BTR within draft Policy HO1 and the cross-reference to Policy H11 of the London Plan as the approach in which BTR schemes will be assessed.</p> <p>WJG comments on draft Policy HO3 which states that within BTR schemes, 70% of the affordable homes should be provided at London Affordable Rent (LAR) and 30% should be provided at London Living Rent (LLR).</p> <p>It is recognised the rental levels for LAR are lower than LLR. WJG also acknowledges and highlights the London Plan's fast-track viability approach where 35% of homes are to be provided at the local authority's defined affordable rents, or 50% on public sector or industrial land.</p> <p>WJG has reviewed BNP Paribas's Local Plan Viability Assessment (May 2022) which supports the emerging Local Plan. BNP Paribas has tested the viability of BTR schemes within the borough providing 35% affordable housing in the form of LLR. BNP Paribas draws several conclusions:</p> <ul style="list-style-type: none"> ☐ The viability of BTR schemes is challenging and are generally less viable than their build for sale equivalent (values are 5 to 15% lower than build for sale). ☐ The viability of BTR schemes is also affected by the health of the economy generally. ☐ "There are many circumstances where 35% affordable housing is viable, but many schemes provide lower levels of affordable housing. The results indicate that some build to rent schemes will need to opt to use the viability route in the Mayor's SPG and will not be able to utilise the 35% threshold route". <p>Despite BNP Paribas demonstrating that many BTR schemes will not be viable with 35% affordable rooms at LLR, the suggested approach within the emerging Local Plan is for 35% affordable housing to be provided as a mix of LLR and LAR, the latter attracting significantly lower rents. The approach promoted by the Council within the draft Local Plan is not supported and justified by the evidence presented within the Viability Assessment.</p> <p>WJG also adds that the Council does not appear to have objectively assessed the need for BTR homes within the borough, the demographics of people that would live within these homes, or the rental levels that would be suitable for the occupiers of the affordable homes within these developments.</p>		

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							<p>By undertaking such an assessment, the approach would be consistent with the latest iterations of both the NPPF and National Planning Practice Guidance (NPPG). Paragraph 62 of the NPPF states:</p> <p>“Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”</p> <p>The NPPG adds:</p> <p>“As part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent. Specific demographic data is available on open data communities which can be used to inform this process. The assessment will enable an evidence-based planning judgement to be made about the need for build to rent homes in the area, and how it can meet the housing needs of different demographic and social groups”.</p> <p>The approach currently advocated by the draft Local Plan will therefore result in many applications for BTR in Lewisham being required to follow the viability route. Given that many BTR developments are forward sold to institutional investors/ funds, BTR developers seek to avoid the viability route. This is because the viability route results in a late-stage viability review being undertaken once the scheme has been funded and is operational.</p> <p>BTR developers and institutional investors require certainty of return at the point when a development is funded.</p> <p>A viability led approach to most BTR schemes will result in a decrease in the number of BTR schemes being delivered in the borough, as with a mixture of reduced viability in general (evidenced by BNP Paribas’s Viability Assessment) and the uncertainties associated with a late-stage viability review, BTR developers will consider that there is too much financial risk. Given that BTR expediently delivers a sizeable number of homes, this will mean that a valuable source of housing within the borough will not be delivered.</p>		

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							<p>WJG therefore requests that the Council, assisted by BNP Paribas, undertakes a further viability appraisal. This appraisal should assess, for a variety of schemes and applying a 35% affordable requirement to those schemes, the affordable rental rate (or mix of rates) that would result in those schemes being viable whilst avoiding the viability review route.</p> <p>The Council and BNP Paribas could also assess the viability of providing 20% of BTR homes within a development at affordable private rent. 20% is the benchmark level of affordable private rent units suggested by the NPPG. By providing a lower proportion of affordable units, the viability appraisal should demonstrate that lower cost affordable products (e.g. LAR), or a mix of affordable rental levels, could be provided.</p> <p>Once tested, these alternative approaches should be reflected within Policy HO3. By undertaking this approach and avoiding the need for most BTR schemes to follow the viability route, it will increase the delivery of this important form of housing in the borough.</p>		
CON092	REP478	Watkins Jones Group			2	HO 7	<p>Purpose Built Student Accommodation</p> <p>WJG supports most of draft Policy HO7. WJG notes, however, that this draft policy omits a key element of Policy H15 of the London Plan, this being that “the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider”.</p> <p>The London Plan approach for the “majority” of student bedrooms was carefully considered by the Mayor’s Academic Forum. The Forum is chaired by the GLA, influences future student accommodation policy, and is composed of representatives from London universities and London boroughs, amongst others. The approach advocated by the London Plan reflects an approach agreed with universities and who may, for example, be resistant to entering into nomination agreements on all student bedrooms within a development.</p> <p>WJG requests that draft Policy HO7 is updated to clarify that, in conformity with the London Plan, most rooms should be subject to a nomination agreement.</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy HO 07 Purpose built student accommodation.</p> <p>The Council notes the specific comments made in relation to consistency with the London Plan. The Council highlights that whilst the new Local Plan should be in general conformity with the London Plan it does not need to replicate it word for word. It is noted that the Greater London Authority have not raised this as a matter of conformity.</p> <p>For clarity, the London Plan forms part of the wider development plan for Lewisham and is a material consideration for decision-taking. Consequently, it is unnecessary for the new Local Plan repeat all of the detail contained within the London Plan.</p>	No further actions required in relation to the new Local Plan.
CON092	REP479	Watkins Jones Group			2	HO 8	<p>Co-Living</p> <p>WJG is supportive of the draft Plan including a co-living policy (Policy HO8) and that this is largely reflective of the approach detailed within Policy H16 of the London Plan (2021).</p>	The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy HO 08 Housing with	No further actions required in relation to the new Local Plan.

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							<p>WJG draws attention to para. 4.1.9 of the London Plan which states, “all other net non-self contained communal accommodation should count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/ units being counted as a single home”. With a significant need for housing in the borough, and with co-living being a valuable source of housing, this matter should be clarified.</p> <p>Conclusion WJG welcomes the opportunity to comment on the draft Local Plan. WJG summarises its comments below:</p> <ul style="list-style-type: none"> • Policy HO1 ‘Meeting Lewisham’s Housing Needs’ – WJG is supportive of the recognition of BTR as a type of housing which will assist in meeting Lewisham’s housing needs. WJG supports the crossreference to Policy H11 of the London Plan. • Policy HO3 ‘Genuinely Affordable Housing’ – WJG considers that the approach suggested for the delivery of affordable housing from BTR developments is not evidenced and will result in BTR schemes not being delivered in the borough, despite BTR being a valuable form of housing. WJG has suggested an approach to resolve this. • Policy HO7 ‘Purpose Built Student Accommodation’ – WJG supports this policy but notes that it does not fully align with the requirements of Policy H15 of the London Plan in respect of the requirement for a nominations agreement on most of the student rooms. WJG requests that this omission is clarified within Policy HO7. • Policy HO8 ‘Housing with Shared Facilities’ – WJG supports the elements of this policy which refer to purpose built shared living or co-living. Co-living will increasingly form a valuable addition of housing within the borough over the lifetime of the plan. Aligning with the London Plan, this policy should clarify that 1.8 co-living units equates to the delivery of one conventional home. 	<p>shared facilities (Houses in Multiple Occupation).</p> <p>For clarity, the Council notes that the new Local Plan acknowledges the London Plan’s position that HMOs play as a strategically important part of the Capital’s housing supply. Providing residential accommodation that helps to meet distinct needs and reduces pressure on other elements of the housing stock. Furthermore, the new Local Plan continues by outlining how HMOs have contributed to making available a wider range of housing options across Lewisham and have a role in helping to meet local housing needs.</p> <p>The Council notes the specific comments made in relation to how new HMO provision is monitored and accounted for in respect of housing delivery. Whilst this additional information may be of interest it is unnecessary to ensure the soundness of the new Local Plan.</p>	
CON093	REP480	CPRE			2	GR 02	<p>Lewisham Local Plan – Regulation 19 Consultation. CPRE London is a membership-based charity with 2,500 members across London, concerned with the preservation and enhancement of London’s vital green spaces, as well as the improvement of London’s environment for the health and wellbeing of all Londoners.</p>	<p>The Council notes and welcomes the comments made in relation to the new Local Plan Policy GR 02 Open Space. In particular, the support for the quantitative increase in Metropolitan Open Land is welcomed.</p>	<p>No further actions required in relation to the new Local Plan.</p>

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							<p>Policy GR2 Open space – lack of clarity in green space deficiency and how it will be tackled: policy must be revised to emphasise provision of green space <i>per person</i> so there is genuinely ‘no net loss’</p> <p>1. <i>Green space per person</i>. This policy seeks to protect the total amount of green space, however with increasingly high-density development, there is a likely risk of net loss of green space <i>per person</i>. This policy should be revised to reflect provision (and deficiency) in terms of the amount and type of green space available per person and appropriate policies introduced to tackle the growing issue.</p> <p>2. <i>Streetparks / Garden Streets</i>. To support the borough’s growing population the council should set out specific, clear proposals to create small parks from grey space including converting whole streets or sections of streets to create ‘streetparks’ (like Alfred Place in Camden).</p> <p>3. <i>Grass sport pitches</i>. Lewisham has fewer sports pitches than most boroughs and no major sports pitch hubs and major densification of Lewisham town centre means, <i>per person</i>, provision will have been substantially eroded. This deficiency should be clear in the Plan and policies should be put in place to address it. In common with other local authorities, the council should adopt the Six Acre Standard.</p> <p>4. <i>Site Allocations</i> Some Site Allocations incorporate proposals to build on green space: these should be deleted or revised to state that all amenity green space will be retained due to the acute shortage in the borough. Please see our specific comments on the Site Allocations below.</p> <p>5. We support the increase in Metropolitan Open Land (MOL from 10% to 12%. We support all new MOL designations (as per ‘Proposed changes to the adopted Policies Map’) and new SINC designations.</p>	<p>The Council considers that the new Local Plan Policy GR 02 Open Space is sound. It is based on an up-to-date evidence base, is positively prepared, in accordance with national policy and provides an effective mechanism for securing investment in new provision to support new developments.</p> <p>The respondent’s proposed green space per person is noted. This takes a historic methodology towards securing new additional open space. Whilst such approach may have benefits, they are not always appropriate, practical nor deliverable within all contexts. The approach taken by the new Local Plan provides sufficient flexibility to facilitate the delivery of entirely new open space where it is practicable, and investment in existing provision, to increase its capacity, where it is not.</p> <p>The new Local Plan clearly identifies, under Figure 10.2 the Borough’s existing open space network, and under Figures 10.4 - 10.6, the areas with evidenced deficiency. This provides a sound baseline from which the Council negotiate and secure investment and where possible and practical new provision. This approach is considered sound.</p> <p>The respondent’s proposal for the introduction of street parks, parklets or garden streets is noted and welcomed. The Council recognises that opportunities for such investments could arise during the Plan period. The Council acknowledges that other London Boroughs (such as Hackney) are adopting such innovative approaches to secure provision. Whilst the new Local Plan is not explicit about such opportunities it does not prevent them coming forward through the development management process. Indeed, the Council suggests that the master planning processes advocated by the new Local Plan provides an ideal platform for such</p>	

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								<p>innovation to emerge. Alternatively, the Council could, like Hackney, consider supplementary guidance on this matter following the adoption of the new Local Plan.</p> <p>The Council also notes that the new Local Plan Policy TR 03 Healthy streets as part of healthy neighbourhoods provides a suitable and appropriate mechanism for securing such provision where the opportunities arise.</p>	
CON093	REP481	CPRE			2	GR 02	<p>Proposed MOL de-designations</p> <p>6. We agree that the three MOL parcels around Lewisham Gateway should be de-designated, however, the remaining parcel of land to the south of Glass Mill Leisure Centre should be retained as MOL as this is now the only green space in this highly built-up area.</p> <p>7. Reduce the four-lane carriageway rather than removing green space at Jubilees.</p> <p>We do not support de-designation of the section of MOL at northern tip of Jubilees Ground, St Dunstan's to accommodate road crossings. Space can and should be created for safe pedestrian crossing points / cycle lanes by reducing the size of the existing four lane carriageway.</p> <p>Use the Local Plan process to give local parks Local Green Space protection</p> <p>8. The Local Plan should designate all key public parks and open spaces in Lewisham, which are not currently protected by MOL status, as Local Green Space to ensure they are protected into the future. We cannot see any proposals for designation smaller green sites as Local Green Space and believe this should be an important inclusion in the final version of the plan.</p> <p>New public parks for Lewisham</p> <p>9. Two sites should be designated as local parks and given protected MOL or Local Green Belt status.</p> <ul style="list-style-type: none"> • Gorne Wood: The Fourth Reserve Foundation the closest site of designated Ancient Woodland to the City of London and should become a park. • The Railway Children Park: This series of green spaces in Grove Park with importance for nature conservation, with heritage and nature value, and its importance as a local park 	<p>The Council notes the comments made in relation to the new Local Plan Policy GR 02; specifically in relation land designated as Metropolitan Open Land.</p> <p>Improvement and Re-alignment of the South Circular Road</p> <p>The Council notes the respondent's comments and opposition to the proposals for re-aligning the South Circular Road, and the associated loss of Metropolitan Open Land. The re-alignment of the South Circular will secure necessary improvements to the Borough's transport networks – including necessary investment in sustainable transport networks – walking, cycling, bus, and rail. These improvements are sound.</p> <p>The consequential impact on the Metropolitan Open Land is justified and constitutes very special circumstance. The proposed road re-alignment will only seek to seek the minimum amount of land necessary for the transport improvements. The boundary of the Metropolitan Open Land will be redrawn accordingly. It is anticipated that the actual land-take, from the Metropolitan Open land will be modest.</p> <p>Local Green Space</p> <p>The Council notes the comments made by the respondent suggesting comprehensive designation of new Local Green Spaces – to provide these spaces as the same level of</p>	No further actions required in relation to the new Local Plan.

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								<p>protection as Metropolitan Open Land (and indeed Green Belt). The Council considers this approach unsound as there is no justification for this action.</p> <p>The comments made in relation to Gorne Wood and the Railway Children Park are noted. Both are already identified as Natural and/ or Semi Natural Green Space (see Figure 10.2) protected as part of the Borough's open space network. For clarity Gorne Wood is already identified as Metropolitan Open Land.</p> <p>Although it may appear desirable to provide public access to locations such as Gorne Wood, it may not be an ideal outcome for the site in terms of its arboriculture and biodiversity value. Indeed, it is a fact that successfully managing public access to sites with biodiversity interest is a successful component of maintaining and enhancing their value. No justification has been provided to demonstrate why changing the Wood's status to a park would be beneficial.</p>	
CON093	REP482	CPRE			2	HO	<p>Housing estates, infill development and reconfiguring car-parking parking provision on estates</p> <p>10. The Local Plan should include a policy for housing estate green spaces, stating that 'infill' schemes will ensure residents do not lose green space <i>per person</i>; building on estate green spaces will be resisted; if green space is lost it will be replaced and preferably enlarged; and that 'grey space' (parking / roads) on estates will be rationalised into specific locations allowing more to be converted to green space. We are very concerned about the council's plans to remove green space on Dacres Road estate which is vital for residents' physical and mental health and is an important haven for wildlife. We also understand 30% of green space on the Valentines Court estate will be lost to development and Mais House estate will lose 19 mature trees and a much loved communal green.</p>	<p>The Council notes the comments made in relation to the new Local Plan – seeking a new policy approach that proactively reconfigures existing car-parking provision on estates.</p> <p>The Council recognises that opportunities for such investments could arise during the Plan period. The Council acknowledges that other London Boroughs (such as Hackney) are adopting such innovative approaches to secure new provision. Whilst the new Local Plan is not explicit about such opportunities it does not prevent them coming forward through the development management process. Indeed, the Council suggests that the master planning processes advocated by the new Local Plan provides an ideal platform for such innovation to emerge. Alternatively, the Council could, like</p>	No further actions required in relation to the new Local Plan.

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								<p>Hackney, consider supplementary guidance on this matter following the adoption of the new Local Plan.</p> <p>The Council also notes that the new Local Plan Policy TR 03 Healthy streets as part of healthy neighbourhoods provides a suitable and appropriate mechanism for securing such provision where the opportunities arise.</p>	
CON093	REP483	CPRE			2	TR 03	<p>Kerbside space 11. A policy should be included on reallocation of kerbside space: We estimate that, in land use terms, a significant amount of land in Lewisham is kerbside space, most of which is likely to be ‘rented’ cheaply for private car parking.</p> <ul style="list-style-type: none"> • The Local Plan should propose re-allocation of land-use for at least 25% of kerbside space in Lewisham – referencing environmental and social goals and establishing an appropriate target for reinstating kerbside as a public space, to be used for everything from bus and cycle lanes, safe cycle storage, shared mobility parking, delivery hubs, rain gardens, tree planting on build-outs, EV charging points on build-outs, parklets, pocket parks, play on the way features/play trails, and whole streetparks (e.g. Lambeth Kerbside Strategy). • Additionally, there should be a policy for main roads to be a maximum of one lane in either direction for general traffic (including main roads) with other space repurposed for sustainable uses. 	<p>The Council notes the comments made in relation to the new Local Plan Policy TR 03 Healthy streets as part of healthy neighbourhoods.</p> <p>The Council notes the suggestion that kerbside space should be re-allocated for either public realm or open space provision; and that a specific percentage target be set by the new Local Plan. The Council considers this to be unsound as there is no evidence to support this approach.</p> <p>Nevertheless, the new Local Plan recognises that opportunities for such investments could arise during the Plan period. The Council acknowledges that other London Boroughs (such as Hackney) are adopting such innovative approaches to secure new provision. Whilst the new Local Plan is not explicit about such opportunities it does not prevent them coming forward through the development management process. Indeed, the Council suggests that the master planning processes advocated by the new Local Plan provides an ideal platform for such innovation to emerge. Alternatively, the Council could, like Hackney, consider supplementary guidance on this matter following the adoption of the new Local Plan.</p>	No further actions required in relation to the new Local Plan.
CON093	REP484	CPRE			2	QD 04	<p>Tall buildings 12. Housing should be limited in height and ‘humanscale’ – eight storeys maximum – to halt a worrying move to super high density without adequate access to open and green space.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 04 Tall Buildings – specifically the suggestion that future growth should be at human-</p>	No further actions required in relation to the new Local Plan.

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								<p>scale and limited a maximum height of eight-storeys.</p> <p>The Council highlights that the new Local Plan's approach to Tall Buildings is sound. It is supported by a comprehensive evidence base, is in accordance with national policy and the London Plan and is effective in delivering good quality place-shaping. The new Local Plan's approach to high intensity development proposals, including those for tall new buildings, promotes good place-shaping and master planning. The Council considers that this provides opportunities to secure new additional open space within the new places. Where this is not possible, the Council will secure appropriate and proportionate contributions towards new or enhanced (capacity) provision.</p>	
CON093	REP485	CPRE			3	LCA SA 10	Site Allocation 10 – House on the Hill at Slaithwaite Road: Mature Trees and green space should be retained.	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10 House on the Hill, Slaithwaite Road.</p> <p>The Council notes the specific comments made in relation to mature trees and green space within the site allocation. The new Local Plan, through the site allocation and its planning policies provides a sound framework for decision-taking. Proposals for the redevelopment of the site allocation will be considered on their merits and will be guided by the new Local Plan. For clarity, the new Local Plan Policy LCA SA 10 seeks the retention of quality trees across the site.</p>	No further actions required in relation to the new Local Plan.
CON093	REP486	CPRE			3	LCA SA 12	Site Allocation 12 – Ladywell Play Tower: Green space and mature trees around the site should be retained.	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 12 Ladywell Play Tower.</p> <p>Council notes the specific comments made in relation to mature trees and green space within the site allocation. The new Local Plan, through its planning policies provides a sound framework for decision-taking. Proposals for the redevelopment of the site allocation will be considered on their merits and will be guided by the new Local</p>	No further actions required in relation to the new Local Plan.

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								Plan. For clarity, the new Local Plan Policy LCA SA 12 seeks a comprehensive scheme for the site that enhances the setting of heritage asset and provides connectivity to the Village and the High Street and the amenity of the adjacent Waterway – which provides an opportunity for green space retention/ enhancement.	
CON093	REP487	CPRE			3	LCA SA 20	Site Allocation 20 – South Circular: We do not support the de-designation of MOL (see earlier).	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 20; specifically in relation land designated as Metropolitan Open Land.</p> <p>The Council notes the respondent’s comments and opposition to the proposals for re-aligning the South Circular Road, and the associated loss of Metropolitan Open Land. The re-alignment of the South Circular will secure necessary improvements to the Borough’s transport networks – including necessary investment in sustainable transport networks – walking, cycling, bus, and rail. These improvements are sound.</p> <p>The consequential impact on the Metropolitan Open Land is justified and constitutes very special circumstance. The proposed road re-alignment will only seek to seek the minimum amount of land necessary for the transport improvements. The boundary of the Metropolitan Open Land will be redrawn accordingly. It is anticipated that the actual land-take, from the Metropolitan Open land will be modest.</p>	No further actions required in relation to the new Local Plan.
CON093	REP488	CPRE			3	LNA SA 09	<ul style="list-style-type: none"> Site Allocation 9 – Surrey Canal Triangle: Green Space and mature trees alongside the railway line should be retained as these provide important habitat for wildlife. 	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 09 Surrey Canal Triangle.</p> <p>The Council notes the specific comments made in relation to mature trees and green space within the site allocation. The new Local Plan, through its planning policies provides a sound framework for decision-taking. Proposals for the redevelopment of the site allocation will be considered on their merits and will be guided by the new</p>	No further actions required in relation to the new Local Plan.

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								Local Plan. For clarity, the new Local Plan Policy LNA SA 09 already seeks to secure public realm and environmental enhancements, including new public open space across the site. It is also noted that the new Local Plan identifies the railway line as a Green Corridor, which could benefit from enhancement, under new Local Plan Policy GR 02/ Figure 10.2 Green Spaces.	
CON093	REP489	CPRE			3	LNA SA 15	<ul style="list-style-type: none"> Site Allocation 15 – Albany Theatre: There is a large amount of green space on site and mature trees. This should not be built on. 	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 15 Albany Theatre.</p> <p>The Council notes the specific comments made in relation to mature trees and green space within the site allocation. The new Local Plan, through its planning policies provides a sound framework for decision-taking. Proposals for the redevelopment of the site allocation will be considered on their merits and will be guided by the new Local Plan. For clarity, the site allocation seeks to secure comprehensive mixed-use redevelopment that includes the retention of the Theatre and enhancement of other heritage assets, and public realm enhancements, including public open space.</p>	No further actions required in relation to the new Local Plan.
CON093	REP490	CPRE			3	LNA SA 16	<ul style="list-style-type: none"> Site Allocation 16 – Land North of Reginald Road and South of Frankham Street: open green space and mature trees on site should be retained. 	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 16 Land north of Reginald Road and south of Frankham Street (former Tidemill School).</p> <p>The Council notes the specific comments made in relation to mature trees and green space within the site allocation. The new Local Plan, through its planning policies provides a sound framework for decision-taking. Proposals for the redevelopment of the site allocation will be considered on their merits and will be guided by the new Local Plan. For clarity, the site allocation seeks the comprehensive redevelopment of the site – securing good place-making that integrates within the wider townscape. This includes the delivery of</p>	No further actions required in relation to the new Local Plan.

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								new and improved public realm and public open space in accordance with a site-wide public realm strategy, including a new landscaped square, framed by new and converted buildings.	
CON093	REP491	CPRE			3	LEA SA 01	<ul style="list-style-type: none"> Site Allocation 1 – Heathside and Lethbridge Estate: trees and green space to the east of the site should not be built on. 	<p>The Council notes the comments made in relation to the new Local Plan Policy LEA SA 01 Heathside and Lethbridge Estate.</p> <p>The Council notes the specific comments made in relation to mature trees and green space within the site allocation. The new Local Plan, through its planning policies provides a sound framework for decision-taking. Proposals for the redevelopment of the site allocation will be considered on their merits and will be guided by the new Local Plan. For clarity, the site allocation seeks the comprehensive redevelopment of the site – securing good place-making that integrates within the wider townscape. This includes the regeneration of the estate that will secure a new high quality residential area including affordable housing, community facilities and public realm enhancements; including open space.</p>	No further actions required in relation to the new Local Plan.
CON093	REP492	CPRE			3	LEA SA 07	<ul style="list-style-type: none"> Site Allocation 7 – Mayfields Hostel, Burnth Ash Hill: The green space and trees should be retained. 	<p>The Council notes the comments made in relation to the new Local Plan Policy LEA SA 07 Mayfields Hostel, Burnt Ash Hill.</p> <p>The Council notes the specific comments made in relation to mature trees and green space within the site allocation. The new Local Plan, through the site allocation and its planning policies provides a sound framework for decision-taking. Proposals for the redevelopment of the site allocation will be considered on their merits and will be guided by the new Local Plan. For clarity, the new Local Plan Policy LEA SA 07 seeks the retention of existing mature trees and trees of value. It also specifically requires that landscaping should contribute positively to the setting of the area, including the existing mature</p>	No further actions required in relation to the new Local Plan.

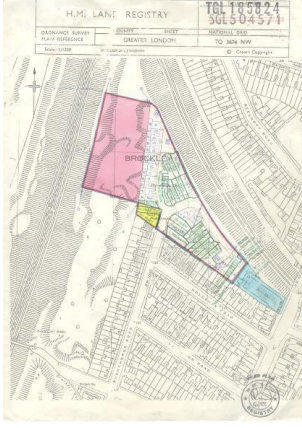
Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
								tree planting to the north, east and west boundaries.	
CON093	REP493	CPRE			3	LSA SA 01	<ul style="list-style-type: none"> Site Allocation 1 – Former Bell Green Gas Holders and Livesey Memorial Hall: This strategic green open space on this site should be retained and the gasworks (or a significant part of it) could be set aside for a large green open space / habitat – connected with neighbouring sites. Ideally the whole site could potentially be transformed into a new public park 	<p>The Council notes the comments made in relation to the new Local Plan Policy LSA SA 01 Former Bell Green Gas Holders and Livesey Memorial Hall.</p> <p>The Council notes the specific comments made in relation to mature trees and green space within the site allocation. The new Local Plan, through its planning policies provides a sound framework for decision-taking. Proposals for the redevelopment of the site allocation will be considered on their merits and will be guided by the new Local Plan. For clarity, the site allocation seeks the comprehensive redevelopment of the site – securing good place-making that integrates within the wider townscape. It also specifically requires the delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy that takes account of, and provides links to, the nearby SINC to the north of the site, and is of beneficial use for residents.</p>	No further actions required in relation to the new Local Plan.
CON093	REP494	CPRE				LSA SA 13	<ul style="list-style-type: none"> Site Allocation 13 – Excalibur Estate: Trees and green space on site should be retained and ideally increased. 	<p>The Council notes the comments made in relation to the new Local Plan Policy LSA SA 13 Excalibur Estate.</p> <p>The Council notes the specific comments made in relation to mature trees and green space within the site allocation. The new Local Plan, through its planning policies provides a sound framework for decision-taking. Proposals for the redevelopment of the site allocation will be considered on their merits and will be guided by the new Local Plan. For clarity, the allocation seeks the comprehensive redevelopment of the site – securing good place-making that integrates within the wider townscape. It also specifically requires that development proposals must protect and seek to enhance green infrastructure, including an adjacent cemetery, designated as SINC land and public open space.</p>	No further actions required in relation to the new Local Plan.

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CON093	REP495	CPRE			3	LWA SA 08	<ul style="list-style-type: none"> Site Allocation 8 – Featherstone Lodge, Eliot Bank: Mature trees on site should be retained. 	<p>The Council notes the comments made in relation to the new Local Plan Policy LWA SA 08 Featherstone Lodge, Eliot Bank.</p> <p>The Council notes the specific comments made in relation to mature trees and green space within the site allocation. The new Local Plan, through its planning policies provides a sound framework for decision-taking. Proposals for the redevelopment of the site allocation will be considered on their merits and will be guided by the new Local Plan. For clarity, the allocation seeks the comprehensive redevelopment of the site – securing good place-making that integrates within the wider townscape. It also specifically requires that development proposals include a tree survey to identify healthy, mature trees to be retained within the garden. It also states that development should be respectful of the natural landscaping and mature landscape setting and create a public realm space to evoke the feeling of a village green.</p>	No further actions required in relation to the new Local Plan.
CON093	REP496	CPRE			3	LWA SA 09	<ul style="list-style-type: none"> Site Allocation 9 – Willow Way Locally Significant Industrial Site: Mature trees on site should be retained. 	<p>The Council notes the comments made in relation to the new Local Plan Policy LWA SA 09 Willow Way Locally Significant Industrial Site.</p> <p>The Council notes the specific comments made in relation to mature trees and green space within the site allocation. The new Local Plan, through its planning policies provides a sound framework for decision-taking. Proposals for the redevelopment of the site allocation will be considered on their merits and will be guided by the new Local Plan. For clarity, the allocation seeks the comprehensive redevelopment of the site – securing good place-making that integrates within the wider townscape. It also specifically requires the delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy. It is envisaged that mature trees that merit retention could be</p>	No further actions required in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
								incorporated into the redevelopment through the public-realm strategy.	
CON094	REP497	British Horse Society			0	General	<p>RE: Lewisham Local Plan Regulation 19 consultation</p> <p>I am responding to this consultation on behalf of The British Horse Society, the UK's largest equestrian charity, with over 119,000 members, representing the country's 3 million horse riders.</p> <p>Key information</p> <ul style="list-style-type: none"> Research undertaken by the University of Brighton and Plumpton College on behalf of The British Horse Society found that <ul style="list-style-type: none"> More than two thirds (68%) of respondents participated in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimates that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity. A range of evidence indicates the vast majority (90% plus) of horse riders are female and more than a third (37%) of the female riders of respondents were above 45 years of age. <p>Horse riding is especially well placed to play a valuable role in initiatives to encourage increased physical activity amongst women of all ages.</p> <ul style="list-style-type: none"> Amongst the horse riders who took part in the survey, 39% had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary. Horse riders with a long-standing illness or disability who took part in the survey are able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability. No-one is better qualified to demonstrate this than our new ambassador, six-time Paralympic Gold Medallist and World Champion, Natasha Baker OBE https://www.youtube.com/watch?v=pLi-89WWlkc 	The Council notes the British Horse Society's introductory comments.	No further action required in relation to the new Local Plan.
CON094	REP498	British Horse Society			3	LEA	<p>Planning Policy, etc.</p> <p>National Planning Policy Framework</p> <ul style="list-style-type: none"> Paragraph 98 states that, "<i>Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities...</i>" Providing for equestrians helps to fulfil this requirement.* Paragraph 100 says, "<i>Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.</i>" Ensuring that equestrians are not 	<p>The Council notes the comments made in relation to Lewisham East Area Place Principles.</p> <p>The Council notes the comments made in relation to maintaining and enhancing strategic green links and sustainable travel networks through this part of the Borough. The Council is broadly supportive of such measures and encourages partnership to identify and deliver provision where it meets a need and is deliverable. The</p>	No further actions required in relation to the new Local Plan.

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							<p>excluded within these enhancements and improved links only improves the value for money of such undertakings.</p> <p>*Within the Lewisham borough, Blackheath is a key area of open space to which horse riders have a legal right to air and exercise under s.193 of the 1925 Law & Property Act. Under this legislation, equestrians have the “lawful right or privilege” referred to in Byelaw 6(1) of the Byelaws for Blackheath (Lewisham section). This right must be protected and made clear.</p> <p>Further, it would take no additional cost to make off road multi use routes inclusive of equestrian access. It would be unlikely to have more than occasional use but would make them truly inclusive of all vulnerable road users.</p> <p>The British Horse Society would be very willing to work with the Council and would be developers in protecting access and improving safety for equestrians.</p>	<p>Council encourages partners to submit such proposals in parallel through the associated Infrastructure Delivery Plan process. Furthermore, there may be additional opportunities for communities in the Blackheath Area to pursue such investment in improvements through the Neighbourhood Planning and CIL processes.</p> <p>In the absence of fully formed schemes, the Council encourages discussion through the above referenced processes.</p>	
CON095	REP499	Fourth Reserve Foundation			2	GR 02	<p>We are really pleased with several updates made to the Local Plan that together highlight the importance of the Buckthorne Cutting in Crofton Park. We feel these updates will help protect the site in any planning considerations. The key changes below are particularly welcomed:</p> <ul style="list-style-type: none"> Buckthorne Nature Reserve has been added to green spaces list The LIGS designation has been included The M122 MSINC corridor has been recommended for Metropolitan Open Land designation. <p>We wonder if the following can also be included in the Local Plan.</p> <p>1. A reference in particular to Gorne Wood. This forms part of the Buckthorne Cutting and has been designated as Ancient Woodland by Natural England.</p> <p>2. In the last year we became aware that a small section of the Buckthorne Cutting Nature Reserve that we have been caring for is not owned by Network Rail as we had thought but by a Holding Company. However in the Land Registry Deeds an agreement seems to have been made in 1988 between Lewisham Council, the railway and the holding company that this small section that includes an orchard and a reed bed, must remain a nature reserve protected in perpetuity for 80 years.</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan and how it addresses and seeks to protect the Borough’s green infrastructure networks.</p> <p>Gorne Wood/ Buckthorne Cutting The Council notes the comments made in relation to this location. The Wood is already identified in the new Local Plan under Policy GR 02 Open Space as natural and/ or semi-natural open space. As stated within the comment, the Wood forms part of the wider extent of Buckthorne Cutting. Although the Council understands and values the respondent’s eagerness to protect and enhance this component of the Borough’s wider infrastructure it is not entirely clear what value, in soundness terms and plan-making terms, will be gained making specific reference to the Wood. As already noted by the respondent is already identified and designated as Ancient Woodland. As such, the Council will seek to protect the Wood through the application of the new Local Plan’s green infrastructure and biodiversity planning policies – including Policies GR 03 Biodiversity and Access to Nature and GR 05 Urban Greening and Trees. For clarity, the Wood and its surroundings are already identified as being within a wider area of</p>	No further actions required in relation to the new Local Plan.

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							<p>'That the Board will preserve all that the land being part of the Buckthorne Road 1 and being more particularly described in the Second Schedule Part II hereto and referred to as "the open space land" for open space purposes and will not use or suffer or permit to be used the open space 1 and for any purpose other than for open space purposes. That the use of the open space land for open space purposes is a "permitted use" within the terms of the Town and Country Planning Act 1971 and no building engineering mining or other operations or change of use (or any other "development") as defined in Section 22 of the Town and Country Planning Act 1971) shall be carried out on the open space land. It is agreed between the Board and the Council that use of the open space land as and for a nature reserve is and shall be constructed as use for open space purposes for the purposes of clauses 2.3 and 2.4 of this Agreement. NOTE: "The open space land" referred to above has been tinted pink on the filed plan.'</p> <p>We wonder if it would be possible at this late stage to name this section of land specifically in the Local Plan so that it's value is clearly identified in planning. It seems to have been viewed by some residents as space in which to extend private gardens and it is priority habitat (reed bed) with veteran trees.</p> <p>I am attaching the planning document and a legal letter from the council asserting it's status as nature reserve - the letter was given to us to use where residents encroach on the land or question the site's nature reserve importance.</p> <p>We'd really appreciate if these two additions can be added to the Local Plan as particularly important sites to protect - it will help in the future particularly as they are privately owned and so particularly in need of protection.</p> <p>*Submission includes copy of HM Land Registry and title plan*</p> <p>Legal Letter from Council: Dear Sir/Madam, Land lying to the north of Buckthorne Road, Crofton Park, Deptford The Council benefits from and may enforce a restrictive covenant over land lying to the north of Buckthorne Road and more particularly shown coloured pink on the plan attached to this letter (the "Open Space Land"). The restrictive covenant requires that, for a period of 80 years from 14 August 1987, the Open Space Land shall not be used for any purpose other than as a nature reserve/open space.</p>	<p>Metropolitan Importance and as Metropolitan Open Land.</p> <p>The Council remains committed to working with its partners to ensure that the Borough's Green Infrastructure networks continue to provide habitat and biodiversity opportunities, contribute towards mitigating the adverse impacts of climate change, and make a positive contribution towards good place-shaping. Where appropriate and practical the Borough Council will seek to direct investment secured through developer contributions and other funding sources to this end. This will possibly include the use of funds secured through Biodiversity Net Gain.</p>	

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CON096	REP500	Urban Developme nt Reform Organisatio n			0	General	<p>I am writing with regard to the Lewisham Local Plan which is under public consultation.</p> <p>We note that the Regulation 18 consultation was conducted during a pandemic and at a time of limited communication. It was also conducted during an election period and this needs to be acknowledged by the Council.</p> <p>The Regulation 19 consultation has occurred concurrently with a consultation proposing changes to the Statement of Community Involvement. Not only this, but Lewisham Council has also made constitutional changes to its planning arrangements whilst this consultation was underway.</p> <p>This has added a further layer of complexity and confusion. Taking all of this in account, more formal consultation is required to achieve a common understanding of all the plans and changes proposed resulting in a flawed consultation. Therefore, the plans are unsound.</p>	<p>The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents.</p> <p>The suggestion that the formal consultations, at the Regulation 18 and Regulation 19 stages, were in some way impeded by restrictions related to the COVID 19 restrictions and recent elections is not supported by any evidence.</p> <p>The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement. Evidence is provided through the Regulation 19 Statement of Representations Procedure and the subsequent Regulation 19 Consultation Statement.</p>	No further actions required in relation to the new Local Plan.
CON097	REP501		Alan	Turpin	3	LCA SA 10	<p>As a resident of Clarendon Rise I wish to object to the demolition of the respite care facility at 47 Slaithwaite Road. Your plan says it is a respite care unit when in fact it has been closed for many years and these proposals look like they are part of the long term plan to run down disabled services to the bare legal minimum. This area has seen the establishment of a Priory clinic in place of an old people's home, the establishment of the Citizens Advice Bureau in a large part of the Leemore Centre, the closure of the Community Hall facility along with the curse of being in the middle of a low traffic zone, which has brought an increase in nuisance parking, and your proposal is to stuff fifty-two more dwellings into the area without any mention of an increase in amenities for local residents. I have no doubt that you will ignore my objections. Alan Turpin.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>For clarity, the new Local Plan Policy LCA SA 10 states that “The site comprises several buildings and a courtyard which were occupied by a residential institution...” The established use class of the site, as noted within the site allocation policy, is for an overnight stay respite centre. That is a fact.</p> <p>The new Local Plan seeks to identify and secure the delivery of new homes to meet</p>	No further actions required in relation to the new Local Plan.

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								<p>the housing needs of the Borough's existing and future residents. The Council considers this now redundant site as an appropriate and sustainable location to meet some of that need.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes. The policy states, under Paragraph 14.67 2) that: <i>Development should be designed in response to the site topography, particularly in terms of building heights and site levels.</i></p>	
CON098	REP502		Tanya	Woolf	3	LCA SA 10	<p>Somewhere in your local plan published for the A21 but not shown clearly in your latest documents for the Local Plan just published, you are proposing the removal of the car park at Slaithwaite Road / Clipper Way. Please be aware of the terrible problems of parking in the area particularly on Sundays when the new church has services "The Tab" where the area is jammed up with inconsiderately and often illegally parked vehicles that church visitors attend in between the hours of approximately 10.30am and 1.45pm. Please see all my earlier emails below.</p> <p><i>While I have responded online to your survey as a resident in one of the streets affected, I have only just become aware of the terrible idea buried in the multiple lengthy documents that you issued that you/Lewisham Council plan to get rid of the Clipper Way/Slaithwaite Road car park and build a 6 storey building on it.</i></p> <p><i>Please register my strongest protest at his irresponsible plan. It is one of the few car parks in easy reach of the shopping centre, new church near the fire station, new hotel and all the new high rise developments under construction. It is a fantasy that getting rid of parking facilities will mean people stop using cars. Our experience as local residents is that people constantly park dangerously/illegally in local streets as soon as parking restrictions go off. This is particularly the case on a Sunday between about 11am-1pm during the main church service. Cars/vehicles block dropped curb access, blocking residents parked on their drives, park on street corners impeding access and safe views to road turns and there are regularly shouting</i></p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>Although the Council acknowledges that residents and communities may find the changes that accompany new development challenging, planned-for growth does bring significant benefits. Most notably, new development brings necessary investment in the infrastructure networks that will benefit not only new but also existing residents and communities. New development also serves a vehicle for regeneration. The new Local Plan's place shaping policies providing a platform for securing good quality design.</p> <p>The Council acknowledges the expressed concerns relating to parking provision for privately owned motor vehicles. The new</p>	No further actions required in relation to the new Local Plan.

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							<p><i>matches between drivers of vehicles attempting to pass one another. This is happening when the car park is in use and is full. Think how much worse this will be when the parking spaces from the car park are no longer available. Where will church goers and hotel residents park? I repeat: it is a fantasy to believe people will “stop using their cars” and it is unreasonable and unjust to expect the local residents to pay the price by having their streets become danger zones where people park irresponsibly and illegally.</i></p> <p><i>Please reconsider this ill-thought out and unrealistically idealistic idea.</i></p> <p><i>Many thanks for this.</i></p> <p><i>I note that you have not responded to my specific concerns about the removal of car parking facilities. The residents already suffer from people attending the church and local facilities parking cars that makes Slaithwaite Road difficult for traffic to pass safely or at all, with many residents suffering damaged vehicles in the process. This happens frequently on Sundays between around 10.30am and 1.45pm while the church has services on. It will be so much worse if there is no car park at all. My concern is that residents are already paying the price for the council’s magical thinking that if you get rid of car parks, visitors will stop driving. Our experience as residents is that this is not the case, and we are the ones suffering.</i></p> <p><i>I repeat that it is a fantasy to think that getting rid of parking facilities will stop out of borough visitors driving their cars into the borough. All that happens is residents are seriously inconvenienced and worse.</i></p> <p>What the new plans would do is reduce legal parking even further plus bring in potentially 100 or more new residents, not to mention even more than that if your plans for 36 new residential units at the House on the Hill go ahead. It is also a fantasy to believe that none of these new residents will have/require vehicles.</p> <p>Please come and view the area any Sunday from 11am-1pm and see for yourself the chaos and worse suffered by residents with the influx of terrible parking that obstructs passing traffic and damages residents’ properties; and imagine how much worse this will be if you get rid of the car park and replace it with yet more residents many of whom WILL have vehicles, no matter what your idealistic beliefs are.</p>	<p>Local Plan is actively seeking to encourage sustainable growth of our Borough’s places. That growth is being supported with investment into strategic and local sustainable travel networks, which will provide residents and communities with viable transport alternatives. The Council considers that during the lifespan of the new Local Plan, residents will be make the choice of either using sustainable travel modes or continuing with car ownership. Evidence demonstrates that societal changes in travel mode do have a profound on place. For these reasons contrary to the stated comments, the Council considers it entirely reasonable that during the plan period demand for private car parking provision will reduce. Advances in vehicle ownership models and technology (particularly AI) could further influence this trend.</p> <p>The comments made in relation to unlawfully parking is noted. The Council will work with partners to manage and enforce operational matters, such as unlawful parking, as part of its regulatory responsibilities and functions.</p>	

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							<p>You might try enforcing the travel plans you imposed on the new church where you believed that people would not drive to church. However, they do and in large numbers.</p> <p>I am writing again to raise formally my objections to your plan for the House on the Hill at Slaithwaite Road.</p> <p>The site is currently an open area with good nature and greenery of some age in a community facility. You are planning to turn this into multi story residential units with no consideration on the impact on the local community that uses the facilities or on residents whose lives this plan will negatively affect. You previously planned to put 36 residential units on the site but now, despite multiple objections from local residents, you have increased the plan to 52 units. You naively once more designate it “vehicle light”. Your idealistic aspirations to reduce vehicle usage are not matched by reality. You said the same thing about the church on Lewisham High street, “the Tab”; yet every Sunday morning residents in the local streets such as Morley Road, Slaithwaite Road and Lingards avenue suffer from inconsiderately and sometimes illegally parked vehicles, accidents and shouting matches as other traffic attempts to pass the chocker block streets almost blocked by parked traffic. The situation will be much, much worse with the additional vehicles associated with 52 new residential units. And whatever you idealistically believe, residents in the new units WILL have vehicles. You cannot wish these away: you need to make realistic provision for parking. The area is already blighted by no parking for the church, the nursery in Morley Road and the new hotel on the high street. With your ludicrous plan to build on the car park at Slaithwaite Road/Clipper Way and the new residential units, the whole area will be constant chaos.</p> <p>I object to this development in the strongest terms.</p>		
CON099	REP503		Russell	Woolley	3	LCA SA 10	<p>I understand that there is a consultation over a proposed development at 47 Slaithwaite Road, SE13 6DL, with the plan to build a six-storey development of 52 residential units. I live on Slaithwaite Road (2 Slaithwaite Road, SE13 6DJ), and I object to any plan to build a six-storey building on this road. Put simply, six storeys is far too high.</p> <p>Slaithwaite Road is a residential side-road with many period Victorian houses. Adding a six-storey block of flats to this road would significantly disrupt the character of the road - it would look ridiculous so close to the Victorian houses. It would also set an alarming precedent, where apparently any large block of</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these</p>	No further actions required in relation to the new Local Plan.

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							<p>flats can be built on any side road, regardless of the effect on the character of the road.</p> <p>Moreover, adding 52 units to a road with already very limited parking is going to cause serious issues. There are already fights breaking out on Sundays when the parked cars from the churchgoers block up all the nearby streets, so adding more to that is only going to make things worse.</p> <p>To be clear, I see no reason why a modest development should not be made at 47 Slaithwaite Road, but it should certainly be no higher than the nearby houses. Six storeys is indefensible.</p> <p>Please confirm that my objections to the proposed development have been noted.</p>	<p>places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan’s spatial strategy, site allocations and planning policies.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The Council acknowledges the expressed concerns relating to parking provision for privately owned motor vehicles. The new Local Plan is actively seeking to encourage sustainable growth of our Borough’s places. That growth is being supported with investment into strategic and local sustainable travel networks, which will provide residents and communities with viable transport alternatives. The Council considers that during the lifespan of the new Local Plan, residents will be make the choice of either using sustainable travel modes or continuing with car ownership. Evidence demonstrates that societal changes in travel mode do have a profound on place. For these reasons contrary to the stated comments, the Council considers it entirely reasonable that during the plan period demand for private car parking provision will reduce. Advances in vehicle ownership models and technology (particularly AI) could further influence this trend.</p> <p>The comments made in relation to unlawfully parking is noted. The Council will work with partners to manage and enforce operational matters, such as</p>	

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								unlawful parking, as part of its regulatory responsibilities and functions.	
CON100	REP504		Mladen	Milosevic	3	LCA SA 10	<p>I am writing to express my strong objection to the proposed housing development of 52 units at 47 Slaithwaite Road, SE13 6DL.</p> <p>My objections are based on several grounds, including the potential impact on the environment, erosion, traffic pollution and the quality of life of local residents.</p> <p>One of my major concerns is the potential environmental impact of the proposed development. The development will require the removal of large trees and green spaces, which will have a negative impact on the local ecosystem and biodiversity. Furthermore, the removal of large trees could also lead to increased ground movement in the area. Trees play a crucial role in stabilizing the soil, and their removal could lead to soil erosion and instability. This could result in ground movement, which would have severe implications for the structural integrity of nearby buildings and roads.</p> <p>In addition to these concerns, the proposed development may also have a negative impact on the local sewage and water system. We are already experiencing poor water pressure at our property. The proposed development will significantly strain the existing sewage and water system.</p> <p>Also, the proposed development will increase traffic pollution. The additional cars on the road will result in increased emissions, which could have a negative effect on the health of residents, particularly those with respiratory conditions.</p> <p>Because of these concerns, I would like to ask you to reconsider the proposed development at 47 Slaithwaite Road, SE13 6DL and NOT to go ahead with such a large project of 52 units.</p> <p>The negative impact on the environment, public health and quality of life for local residents far outweigh any potential development benefits. Thank you for considering my objections.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan’s spatial strategy, site allocations and planning policies.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes. For clarity, the new Local Plan Policy LCA SA 10 sets out a development requirement that trees of quality located within the site, particularly along its boundary, must be retained.</p> <p>The comments made in relation to utilities infrastructure capacity, specifically water, are noted. The Council continues to work closely with all of its infrastructure partners, in this case Thame Water, to ensure that networks have the necessary capacity to accommodate the planned-for growth.</p>	No further actions required in relation to the new Local Plan.
CON101	REP505		Elisabeth	Grellet		LCA SA 10	As a local resident on Limes Grove, I strongly object to the planning of developing 52 units. Lewisham doesn't need anymore high buildings.	The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.	No further actions are required in relation to the new Local Plan.

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							House on the Hill should remain a community building and keep its existing gardens and size. It is a quiet area, close to the centre and should be kept this way.	<p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan’s spatial strategy, site allocations and planning policies.</p> <p>Although the Council acknowledges that residents and communities may find the changes that accompany new development challenging, planned-for growth does bring significant benefits. Most notably, new development brings necessary investment in the infrastructure networks that will benefit not only new but also existing residents and communities. New development also serves a vehicle for regeneration. The new Local Plan’s place shaping policies providing a platform for securing good quality design.</p>	
CON102	REP506		Richard	Hallam		LCA SA 10	<p>I wrote to object to an earlier proposal on this site over a year ago and feel even more strongly about this one, especially as it proposes even more housing units. As far as I can see from the plans, every square inch will be covered with bricks, asphalt, or concrete. At present, there is only one large single story unit on the site in leafy surroundings, a welcome relief for local residents.</p> <p>In closing off roads, Lewisham’s recent policy has been to make the environment more pleasant to live in. This development will have the opposite effect. Since moving here in 2000, almost every spare patch of land in Central Lewisham has been built on, much of it with high rise apartments. The proposed development is another example, leading to an unacceptable population density in this residential area. It will degrade the local environment and I strongly object.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is</p>	No further actions are required in relation to the new Local Plan.

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								<p>reflected by the new Local Plan's spatial strategy, site allocations and planning policies.</p> <p>Although the Council acknowledges that residents and communities may find the changes that accompany new development challenging, planned-for growth does bring significant benefits. Most notably, new development brings necessary investment in the infrastructure networks that will benefit not only new but also existing residents and communities. New development also serves a vehicle for regeneration. The new Local Plan's place shaping policies providing a platform for securing good quality design.</p>	
CON103	REP507		Manpreet	Rai		LCA SA 10	I am concerned about the development proposed for House on the Hill, Slaithwaite Road. Please can you confirm how high the development will be?	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes. The policy states, under Paragraph 14.67 2) that: <i>Development should be designed in response to the site topography, particularly in terms of building heights and site levels.</i></p> <p>The new Local Plan Policy LCA SA 10 does not seek to provide a detailed or prescriptive requirement for the scale and height of any future development on this site. Such examination and assessment are correctly delegated to the decision-taking process at planning application stage, which will be informed by the new Local Plan. Residents and communities will have a full opportunity to engage in that process.</p>	No further actions are required in relation to the new Local Plan.
CON104	REP508		Andrew	Moran		LCA SA 10	I am emailing to register my objection to the proposed development of the House on the Hill site at 47 Slaithwaite Road, SE13 6DL on the following grounds:	The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.	No further actions are required in relation to the new Local Plan.

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							<ul style="list-style-type: none"> the loss of the current building which is designated for community use. the previous already excessive proposal of 36 residential units has now been increased to 52. An increase in the local population would further add to existing pressure on parking spaces, traffic, vehicle movements, pollution and noise on and around Slaithwaite Road. A development of potentially 6 storey's high would result in the ambience and character of the area being lost in the name of profits for developers charging extortionate rents for properties not targeted at those most vulnerable in the current housing crisis. An increase in the local population will also place further pressure on already stretched GP, dental & hospital services. the disruption caused to residents during demolition and construction of the proposed structure in the form of dirt, dust, noise and heavy vehicles. 	<p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan's spatial strategy, site allocations and planning policies.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The Council acknowledges the expressed concerns relating to parking provision for privately owned motor vehicles. The new Local Plan is actively seeking to encourage sustainable growth of our Borough's places. That growth is being supported with investment into strategic and local sustainable travel networks, which will provide residents and communities with viable transport alternatives. The Council considers that during the lifespan of the new Local Plan, residents will be make the choice of either using sustainable travel modes or continuing with car ownership. Evidence demonstrates that societal changes in travel mode do have a profound on place. For these reasons contrary to the stated comments, the Council considers it entirely reasonable that during the plan period demand for private car parking provision will reduce. Advances in</p>	

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								<p>vehicle ownership models and technology (particularly AI) could further influence this trend.</p> <p>The comments made in relation to utilities infrastructure capacity, are noted. The Council continues to work closely with all its infrastructure partners to ensure that networks have the necessary capacity to accommodate the planned-for growth.</p> <p>Following determination, the Council will work with the construction industry to ensure that implementation is carried out in accordance with the legal agreements that accompany the permission. This will include compliance matters relating to actual construction and any related activities – including delivery of materials and transporting of spoil.</p>	
CON105	REP509		Sue	Baker-Bates		LCA SA 10	<p>If my information is correct with reference to the proposed development at 47 Slaithwaite Road, SE13 6DL. (Lewisham local plan p.486), I would like to make the following comments.</p> <ol style="list-style-type: none"> 1. In view of the architectural nature of the area, any construction greater than 2 or 3 stories will result in a building higher than those around and negatively change the appearance of the neighbourhood. 2. What arrangements are to be made or provision made for the vulnerable people catered for by the existing property? Note that the demand for such provision will inevitably increase in the near future. Why lose a current provision that is so badly needed. 3. I understand the terms “car free” and “car light” are used in reference to the proposed block of flats. This surely means lack of parking spaces for the residents and thus some 40 or so additional cars parked in the local streets. This will greatly exacerbate the present difficult parking situation. <p>I submit these comments for your consideration for including in the next stage of the planning process. I personally, would like to see a low rise development that would include social provisions as now, affordable renting for our service providers, private housing and some car parking facilities.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan’s spatial strategy, site allocations and planning policies.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character</p>	No further actions are required in relation to the new Local Plan.

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								<p>and appearance, and the potential capacity for new homes.</p> <p>The Council acknowledges the expressed concerns relating to parking provision for privately owned motor vehicles. The new Local Plan is actively seeking to encourage sustainable growth of our Borough's places. That growth is being supported with investment into strategic and local sustainable travel networks, which will provide residents and communities with viable transport alternatives. The Council considers that during the lifespan of the new Local Plan, residents will be make the choice of either using sustainable travel modes or continuing with car ownership. Evidence demonstrates that societal changes in travel mode do have a profound on place. For these reasons contrary to the stated comments, the Council considers it entirely reasonable that during the plan period demand for private car parking provision will reduce. Advances in vehicle ownership models and technology (particularly AI) could further influence this trend.</p> <p>Although the Council acknowledges that residents and communities may find the changes that accompany new development challenging, planned-for growth does bring significant benefits. Most notably, new development brings necessary investment in the infrastructure networks that will benefit not only new but also existing residents and communities. New development also serves a vehicle for regeneration. The new Local Plan's place shaping policies providing a platform for securing good quality design.</p>	
CON106	REP510		Paula Gail	Mitchell Jones		LCA SA 10	<p>We are pleased to have another opportunity to comment on the Local Plan for Lewisham, specifically on the proposed site allocation and possible development of the House On The Hill site - 47 Slaithwaite Road.</p> <p>Please note - it would be courteous to spell the name of the actual road correctly on your document. Considering the</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The Council takes careful note and welcomes the comment made in relation to the use of the correct spelling of the site</p>	No further actions are required in relation to the new Local Plan.

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							<p>potential impact this proposed development will have on the current residents, that you can't even use the correct road spelling, gives the impression of disregard and a disinterested council going though the motions.</p> <p>Although we would support more affordable/social housing, most new developments in Lewisham currently do not eventually result in delivering this for a variety of reasons. The plan now suggests that the site may be used for 52 mixed residential units. What does that mean? Are these all affordable/social? It is very worrying that the Council response to the last resident consultation, is an increase to the number of units originally proposed, from 36 to 52! It conveys the feeling that residents concerns of the negative impact this development will have on our environment are being totally ignored.</p> <p>There is already high density housing in this area, with many apparent unregistered HMO'S, and numerous problems relating to very high air pollution, high levels of traffic and fly-tipping. The objections we have to this space being developed for housing are similar to our last response and include:</p> <ol style="list-style-type: none"> 1) Increased Air Pollution. The area suffers from a very high level of toxic air pollution. This improved significantly when local residents campaigned for the gated closure where Clarendon Rise meets Bonfield Road. However, further efforts are required to improve this further, as a combination of inadequate signage and lack of enforcement means traffic still heavily uses the road, in an attempt to access the Lee High Road or find parking space. Introducing new housing to this area will add to this serious air pollution issue. In addition there is a relatively new Travel Lodge and Church at the bottom of the road, both of which have no apparent parking facilities. This has recently introduced even more non residential traffic into this area, and exacerbated the traffic pollution issues. What parking facilities will be provided for the additional units proposed for the House on the Hill development? This area has a large diverse community. When nine-year-old Ella Kissi-Debrah, from this area of Lewisham, became the first person to have air pollution listed as a cause of death, it sent the stark message that people living in poorer urban areas and minority groups are especially at risk of the dangers of increased carbon emissions. If even more cars and construction work are introduced to 	<p>allocation's place name. The Council will endeavour to ensure that the correct spellings are used for all the places identified in the new Local Plan.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan's spatial strategy, site allocations and planning policies.</p> <p>The Council shares the respondent's concern for ensuring that new development secures an appropriate and proportionate level of new genuinely affordable housing provision. The new Local Plan seeks to achieve this objective through its spatial strategy for growth, its site allocations and planning policies – specifically in terms of the latter, new Local Plan Policy HO 3 Genuinely Affordable Housing. The Council considers this approach sound.</p> <p>The Council notes the comments raised in relation to housing in multiple occupation. The Council acknowledges the concern that residents and communities express in relation to this matter. In response, the new Local Plan Policy HO 8 Housing with shared facilities (Houses in Multiple Occupation) seeks to manage proposals for new additional provision. The Council continues to address this matter through its decision-taking and licensing functions.</p>	

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							<p>this area, this will clearly have a negative impact on air pollution levels. How will the Council monitor and act on any increase in the air pollution levels, or enforce any increased traffic reduction initiatives? Additionally better, clearer, signage is required, particularly on the right hand turning from Lingards Road onto Slaithwaite Road to reduce current levels of non residential traffic which impacts on the air quality of the area. Recent attempts to introduce LTN's in this area were very disappointing. Too often the local public support for the measures are overshadowed by a small group of more vocal opponents, who are not local residents. It is noticeable in Lewisham that the location of the more child and family friendly parks with better amenities, and LTN's are disproportionately benefitting the wealthier postcodes. Traffic and the consequent pollution have been shifted onto displacement routes with less affluent communities. The inherent unfairness of this is highly divisive. Any possible development of the House on the Hill site should consider that this area is very central, ringed by major highly polluted roads carrying displaced traffic. The area has been sorely neglected in terms of air quality and environmental improvements in recent years. Rather than build on this area can the site be used to plant additional trees, to help improve air quality, as part of the Mayor of London's tree planting scheme? This would help make the area a more liveable and healthy neighbourhood.</p> <p>2) 2) Need for more Green Space in Central Lewisham. The House on the Hill has a lot of old and established trees and potentially is a rare green space in this central Lewisham area. Can it not be redeveloped as a community garden, park or allotments e.g. for AFRIL? The Mayor of London is committed to preserving and increasing our tree canopy. This site seems ideal to develop into a vibrant green space for local residents, in this highly polluted urban area. Green infrastructure is just as important to Lewisham as its grey infrastructure. Enabling multiple green spaces promotes healthier living, providing spaces for physical activity and improves mental health. Green spaces filter pollutants to improve air and water quality, they facilitate clean, comfortable and more attractive streets and encourage walking and cycling. All very much needed in this area. Every time a new development is proposed in central Lewisham it is accompanied by uplifting architectural pictures of</p>	<p>The concerns expressed in relation to air quality are noted. The new Local Plan is actively seeking to encourage sustainable growth of our Borough's places. That growth is being supported with investment into strategic and local sustainable travel networks, which will provide residents and communities with viable transport alternatives. The Council considers that during the lifespan of the new Local Plan, residents will be make the choice of either using sustainable travel modes or continuing with car ownership. Evidence demonstrates that societal changes in travel mode do have a profound on place. For these reasons contrary to the stated comments, the Council considers it entirely reasonable that during the plan period demand for private car parking provision will reduce. Advances in vehicle ownership models and technology (particularly AI) could further influence this trend.</p> <p>The Council acknowledges the need to ensure that Green Infrastructure networks are fully integrated into the place-making that will deliver planned-for growth. The new Local Plan seeks to address this through its spatial strategy, site allocations and planning policies. The policies set out under Chapter 10 of the new Local Plan – Green Infrastructure seek to strengthen and secure local and strategic networks across and beyond the Borough. For clarity, the new Local Plan Policy LCA SA 10 already states that trees of quality located within the site, particularly along its boundary, must be retained.</p> <p>Furthermore, the Council notes that the new Local Plan Policy TR 03 Healthy streets as part of healthy neighbourhoods, provides a suitable policy hook to secure public realm improvements across residential areas that in the medium to longer term could contribute towards wider green infrastructure networks – for example, through tree planting or more</p>	

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							<p>additional green spaces for the residents. These have very rarely materialised. The Gateway development is a prime example of this. Social demand for urban green space is getting stronger, post pandemic, and any opportunity to retain/expand these sites needs to be grasped. We note that the ‘trees of quality on this site’ are referenced in the proposal, and it states that those particularly on the boundary ‘MUST be retained’! Why not use this rare green area in central Lewisham to meet the A21 corridor aims of maximising ... ‘urban greening measures’. If even more cars and construction work are introduced to this area, this will clearly have a negative impact on air pollution levels. How will the Council monitor and act on any increase in the air pollution levels, or enforce any increased traffic reduction initiatives? Additionally better, clearer, signage is required, particularly on the right hand turning from Lingards Road onto Slaithwaite Road to reduce current levels of non residential traffic which impacts on the air quality of the area. Recent attempts to introduce LTN’s in this area were very disappointing. Too often the local public support for the measures are overshadowed by a small group of more vocal opponents, who are not local residents. It is noticeable in Lewisham that the location of the more child and family friendly parks with better amenities, and LTN’s are disproportionately benefitting the wealthier postcodes. Traffic and the consequent pollution have been shifted onto displacement routes with less affluent communities. The inherent unfairness of this is highly divisive. Any possible development of the House on the Hill site should consider that this area is very central, ringed by major highly polluted roads carrying displaced traffic. The area has been sorely neglected in terms of air quality and environmental improvements in recent years. Rather than build on this area can the site be used to plant additional trees, to help improve air quality, as part of the Mayor of London’s tree planting scheme? This would help make the area a more liveable and healthy neighbourhood.</p> <p>3) 3) Additional Services Required. Already there is an inadequate provision of GP, Dentists, School services etc in central Lewisham. If there is a further increase in residents, are these services set to expand? What actions/interventions are being/will be made to address this? Thames Water seem to be constantly attending sewer or pipe/water pressure difficulties in</p>	<p>innovative measures such as street parklets.</p> <p>The comments made in relation to utilities infrastructure capacity, are noted. The Council continues to work closely with all its infrastructure partners to ensure that networks have the necessary capacity to accommodate the planned-for growth.</p> <p>Following determination, the Council will work with the construction industry to ensure that implementation is carried out in accordance with the legal agreements that accompany the permission. This will include compliance matters relating to actual construction and any related activities – including delivery of materials and transporting of spoil.</p> <p>Although the Council acknowledges that residents and communities may find the changes that accompany new development challenging, planned-for growth does bring significant benefits. Most notably, new development brings necessary investment in the infrastructure networks that will benefit not only new but also existing residents and communities. New development also serves a vehicle for regeneration. The new Local Plan’s place shaping policies providing a platform for securing good quality design.</p>	

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							<p>this area. Inevitably adding this building will exacerbate the current situation.</p> <p>4) 4) Building work introducing more noise and pollution. Construction activities are a large contributor to air pollution. The House on the Hill site is surrounded by housing on all sides, and the residents will be subjected to even more pollution than normal! The level of dust and noise generated during land clearance and demolition alone, will have a massive impact on local residents. As we are currently already experiencing high levels of air pollution in this area from vehicle emissions, additional pollution caused by building work and plant machinery would undoubtedly have health consequences for all of us living in this area.</p> <p>5) 5) Notification of proposed work: Lastly, the way this proposal was advertised is AGAIN very concerning. One A4 notice attached to a lamppost is not the most effective way of communicating proposed works to the wider community. Most local people would not see this. Most residents are currently unaware of this proposal and its implications. If the assumption is that communication takes place online, the Council are excluding a lot of local residents from the conversation, and a greater effort to be more inclusive should be made. Even though we received a copy of the local plan online, it is a very dense document, and identifying any proposals buried on page 453 a significant task. Additionally, much of the language used is procedural and opaque, and very unclear. In summary, we are incredibly disappointed to see that the proposal is to build on the footprint of the House On The Hill rather than the development and inclusion of a much needed green space accessible to all. During the pandemic local residents came to really appreciate local green spaces, and in central Lewisham they are desperately needed to improve our poor air quality. Investing in urban public green spaces brings many health and social benefits. As residents we are already concerned about toxic air, and wonder what is being done about reducing it in this particular area? We would like clarification how this proposed building will be designed to respond positively to the character of the area, and what the height restriction will be, as no current local building exceeds 3 stories. Based on the unsympathetic and indifferent architecture seen in the Gateway development, I hope local residents will be able to contribute to any design proposal.</p>		

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							We hope to be given the opportunity to work with the Council, to shape and attempt to make a positive impact on our environment. Regrettably, at the moment the excessive levels of pollution in this area are already very worrying, and any further building and lack of initiatives to reduce traffic emissions, leave us feeling very anxious about the potentially lethal health impacts on residents. This proposal does not appear to have the best interests of our community in mind.		
CON107	REP511		Kieran	Turner		LCA SA 10	<p>I am a resident of Lewisham (Morley Road), and saw with dismay that there are plans to build on Slaithwaite Road.</p> <p>It looks like despite local objections the proposed development has INCREASED in size to 52 units.</p> <p>There is already SO MUCH construction that I cannot see the need to build on every single spare plot of land and space in the borough.</p> <p>With the HUGE number of flats being built, is the Council investing more into local services? Are there going to be more trains running?</p> <p>We also are lucky enough to live in a LTN – will this change with another (potential) 52 cars needing to park nearby?</p> <p>If the building is extended to 6 storeys as is rumoured, this would have a huge impact on the local area – as all the houses nearby are a maximum of 3 stories.</p> <p>And of course, as it is at the top of a hill, it would seem even taller.</p> <p>At some point, this rampant housebuilding in Lewisham has to end. It is already blocking out the sun on many parts of the walk to Lewisham station, and there does seem to be an obsession with building on every single square foot of land.</p> <p>Please re-consider this proposal.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan’s spatial strategy, site allocations and planning policies.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The new Local Plan is actively seeking to encourage sustainable growth of our Borough’s places. That growth is being supported with investment into strategic and local sustainable travel networks, which will provide residents and communities with viable transport alternatives. The Council considers that during the lifespan of the new Local Plan,</p>	No further actions are required in relation to the new Local Plan.

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CON108	REP512		Richard	Stableford		LCA SA 10	<p>I wish to register my objection to the proposed development of The House on the Hill, Slaithwaite Rd. SE13.</p> <p>I object that 52 residential units are proposed on this site. This is a significant increase from the 36 units that were initially proposed and will have a detrimental effect on the local area including local wildlife.</p> <p>I cannot see how 52 units can be built , without having 6 storey towers. This will block out daylight for local residents .</p> <p>The site is also a wildlife haven for birds and animals (including woodpeckers ducks and foxes) , with good variety of trees and fauna for wildlife to thrive in. Any development will be a threat to this.</p> <p>I also object because the development will mean I will lose my privacy, as I live directly opposite the site. It will have a negative impact on the local character.</p> <p>Please consider my objections at the planning meeting / consultations .</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan’s spatial strategy, site allocations and planning policies.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The Council acknowledges the need to ensure that Green Infrastructure networks are fully integrated into the place-making that will deliver planned-for growth. The new Local Plan seeks to address this through its spatial strategy, site allocations</p>	No further actions are required in relation to the new Local Plan.

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CON109	REP513		Ljubica	Milosevic		LCA SA 10	<p>I am writing to express my strong objection to the proposed housing development of 52 units at 47 Slaithwaite Road, SE13 6DL.</p> <p>My objections are based on several grounds, including the potential impact on the environment, erosion, traffic pollution and the quality of life of local residents.</p> <p>Please ask yourself if building a high scraper on the top of the hill is reasonable.</p> <p>(Existing residential houses will be in direct danger of land erosion.)</p> <p>Thank you for considering my objections.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The Council notes the comment that redevelopment will harm the amenity enjoyed by neighbouring residents. This is an important consideration – however, it is beyond the scope of plan-making. Nevertheless, it is a matter that will be explored through the Council’s decision-taking responsibilities.</p>	No further actions are required in relation to the new Local Plan.
CON110	REP514		Carl	Hendricks e		LCA SA 10	<p>I am writing to you to object in the strongest possible terms to the planning permission granted for the proposed development at number 47 Slaithwaite Road, (House on the hill) Lewisham SE13 6DL, London.</p> <p>The recent increase in the number of residential units from 36 to 52 is unacceptable and will have a severe impact on the community in the area. The increased car traffic on already congested roads will create a hazardous environment for</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10. For clarity, there is no live planning permission in relation to the site; the consultation purely relates to a local plan site allocation.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that</p>	No further actions are required in relation to the new Local Plan.

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							<p>pedestrians and drivers alike. The addition of a new hotel, church, and nursery has already made this problem worse, and it is vital that further strain on the infrastructure is not introduced.</p> <p>Furthermore, the loss of a community building is a significant concern, and the development will place immense pressure on GP and dental services in the area, as well as local hospitals. The character of the area will be irrevocably changed, and the proposed development will cause a significant amount of disruption, including the dirt, dust, and noise that goes along with a large construction site.</p> <p>I implore you to reconsider the granting of planning permission for this development. The detrimental impact on the community, the environment, and the local infrastructure cannot be overlooked, and it is essential that these concerns are addressed before any further action is taken.</p> <p>Thank you for your attention to this matter.</p>	<p>intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan’s spatial strategy, site allocations and planning policies.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The comments made in relation to infrastructure capacity, are noted. The Council continues to work closely with all its infrastructure partners to ensure that networks have the necessary capacity to accommodate the planned-for growth.</p> <p>Following determination, the Council will work with the construction industry to ensure that implementation is carried out in accordance with the legal agreements that accompany the permission. This will include compliance matters relating to actual construction and any related activities – including delivery of materials and transporting of spoil.</p>	
CON111	REP515		Dalia	Smaizyte		LCA SA 10	<p>I am writing to you to object in the strongest possible terms to the planning permission granted for the proposed development at number 47 Slaithwaite Road, (House on the hill) Lewisham SE13 6DL, London.</p> <p>The recent increase in the number of residential units from 36 to 52 is unacceptable and will have a severe impact on the community in the area. The increased car traffic on already</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across</p>	No further actions are required in relation to the new Local Plan.

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							<p>congested roads will create a hazardous environment for pedestrians and drivers alike. The addition of a new hotel, church, and nursery has already made this problem worse, and it is vital that further strain on the infrastructure is not introduced.</p> <p>Furthermore, the loss of a community building is a significant concern, and the development will place immense pressure on GP and dental services in the area, as well as local hospitals. The character of the area will be irrevocably changed, and the proposed development will cause a significant amount of disruption, including the dirt, dust, and noise that goes along with mass construction sites.</p> <p>I implore you to reconsider the granting of planning permission for this development. The detrimental impact on the community, the environment, and the local infrastructure cannot be overlooked, and it is essential that these concerns are addressed before any further action is taken.</p>	<p>Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan’s spatial strategy, site allocations and planning policies.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The comments made in relation to infrastructure capacity, are noted. The Council continues to work closely with all its infrastructure partners to ensure that networks have the necessary capacity to accommodate the planned-for growth.</p> <p>Following determination, the Council will work with the construction industry to ensure that implementation is carried out in accordance with the legal agreements that accompany the permission. This will include compliance matters relating to actual construction and any related activities – including delivery of materials and transporting of spoil.</p>	
CON112	REP516		Dean	Pignon		LCA SA 10	<p>I am writing to you to object in the strongest possible terms to the planning permission granted for the proposed development at number 47 Slaithwaite Road, (House on the hill) Lewisham SE13 6DL, London.</p> <p>The recent increase in the number of residential units from 36 to 52 is unacceptable and will have a severe impact on the community in the area. The increased car traffic on already congested roads will create a hazardous environment for pedestrians and drivers alike. The addition of a new hotel,</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable</p>	No further actions are required in relation to the new Local Plan.

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							<p>church, and nursery has already made this problem worse, and it is vital that further strain on the infrastructure is not introduced.</p> <p>Furthermore, the loss of a community building is a significant concern, and the development will place immense pressure on GP and dental services in the area, as well as local hospitals. The character of the area will be irrevocably changed, and the proposed development will cause a significant amount of disruption, including the dirt, dust, and noise that goes along with mass construction sites.</p> <p>I implore you to reconsider the granting of planning permission for this development. The detrimental impact on the community, the environment, and the local infrastructure cannot be overlooked, and it is essential that these concerns are addressed before any further action is taken.</p> <p>Thank you for your attention to this matter.</p>	<p>transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan’s spatial strategy, site allocations and planning policies.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The comments made in relation to infrastructure capacity, are noted. The Council continues to work closely with all its infrastructure partners to ensure that networks have the necessary capacity to accommodate the planned-for growth.</p> <p>Following determination, the Council will work with the construction industry to ensure that implementation is carried out in accordance with the legal agreements that accompany the permission. This will include compliance matters relating to actual construction and any related activities – including delivery of materials and transporting of spoil.</p>	
CON113	REP517		Wayne	Duley		LCA SA 10	<p>I am responding to the proposal to develop this site from the current single storey community building into a multi-storey block providing 52 residential units.</p> <p>I am a Slaithwaite Road resident (for 30 years) and strongly object to this proposal. I have a number of concerns:</p> <ul style="list-style-type: none"> Completely inappropriate type of development for the area in terms of height and design. How does this meet Key Spatial Objective no. 5 to <i>“Reinforce and enhance the character of established residential areas, local centres and parades. At the same time, deliver</i> 	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these</p>	No further actions are required in relation to the new Local Plan.

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							<p><i>new homes and area improvements through their sensitive intensification”? You only account for “....deliver new homes.....” and ignore the principal intention of the objective.</i></p> <ul style="list-style-type: none"> • Completely inappropriate change of use from a community asset providing a much needed service, to a money-spinner for the developers. Obviously there is need to increase the housing stock, but 52 residential units (housing 181 people) is way too many for the site, whatever ‘formula’ you are using. • It should remain as a centre to be used in some way for the benefit of the community. • Loss of privacy for existing residents who will have high level windows (and maybe even <i>balconies</i>) looking down into their houses and gardens. • Disastrous impact on traffic movements and local residential parking. We are already swamped with incoming vehicles from the Travelodge Hotel and the new church on Lewisham High Street. Having filled the car park they take every space in the residents’ parking bays and even on the yellow lines and across people’s driveways. There is a need to make all of the parking bays in Slaithwaite Road, Morley Road, Lingards Road and Clarendon Rise resident permits only, 24 hrs x 7 days, restricting non-resident parking to the car park. If they can’t park, <i>maybe</i> they’ll use public transport. • If any building does go ahead on this site then it needs to be restricted to a car-free development not just car-light (while recognising the right of disabled drivers to use the bays). • It takes days to get a GP appointment, you are lucky to find a NHS dentist, the hospital is already stretched to breaking point and you want to shoehorn in another possibly another 181 people. Where are the additional resources to support them. • It may not seem to be a big issue but the water pressure up the hill is already low. We’ll be lucky if we can fill kettle with 52 new showers being used. Where is the plan to improve that. • The consultation process seems designed to exclude the existing local community. The response is always that it is conducted in line with policy x, y or z but what it doesn’t do is actively engage the people that it will most affect. The information is there if you know about it and can find it. I complained about the first round of consultation in 2021 so was lucky enough to get e letter and some emails from the planners. My neighbours and the rest of the people I have spoken to 	<p>places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan’s spatial strategy, site allocations and planning policies.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The comments made in relation to infrastructure capacity, are noted. The Council continues to work closely with all its infrastructure partners to ensure that networks have the necessary capacity to accommodate the planned-for growth.</p> <p>The Council notes the comment that redevelopment will harm the amenity enjoyed by neighbouring residents. This is an important consideration – however, it is beyond the scope of plan-making. Nevertheless, it is a matter that will be explored through the Council’s decision-taking responsibilities.</p> <p>The new Local Plan is actively seeking to encourage sustainable growth of our Borough’s places. That growth is being supported with investment into strategic and local sustainable travel networks, which will provide residents and communities with viable transport alternatives. The Council considers that during the lifespan of the new Local Plan, residents will be make the choice of either using sustainable travel modes or continuing with car ownership. Evidence demonstrates that societal changes in travel mode do have a profound on place.</p>	

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							<p>never spotted the A4 notice stuck to a lamppost (before the weather took it) and were completely unaware of it. The purpose of your policies should be to reach the people to seek and take account of their views but whichever policy you are in line with, it doesn't work! When an actual planning application is made there must be a well publicised consultation process that genuinely listens.</p> <ul style="list-style-type: none"> In the first round of consultation on this development a petition of almost sixty signatures, as well as a number of direct comments (all objecting to the proposals) were submitted. Those views are still valid, at least, the people who submitted them believe that their views should still be recognised and their comments brought forward. They therefore may not submit new comments, believing that they have already done so. The only change from the first round in 2021 is to increase the number of units from 36 to 52. Is it possible that these successive rounds of 'consultation' are designed to reduce the number of objections being reported? <p>Please register my objection to the development.</p>	<p>For these reasons contrary to the stated comments, the Council considers it entirely reasonable that during the plan period demand for private car parking provision will reduce. Advances in vehicle ownership models and technology (particularly AI) could further influence this trend.</p> <p>The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents.</p> <p>The suggestion that the formal consultations, at the Regulation 18 and Regulation 19 stages, were in some way designed to exclude participation is not supported by any evidence.</p> <p>The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement. Evidence is provided through the Regulation 19 Statement of Representations Procedure and the subsequent Regulation 19 Consultation Statement.</p> <p>For clarity, the purpose of the new Local Plan is to guide and inform the decision-taking that will deliver planned-for growth and its necessary supporting infrastructure. That process actively seeks to involve residents and communities. To achieve this the Council has taken reasonable measures to engage with residents and communities. Engagement remains an evolving two-way process. The Council takes careful of constructive comments that can help improve these processes.</p>	
CON114	REP518		Filomena	Dellamura		LCA SA 10	<p>I am responding to the proposal to develop this site from the current single storey community building into a multi-storey block providing 52 residential units.</p> <p>I am a Slaithwaite Road resident (for 30 years) and strongly object to this proposal. I have a number of concerns:</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the</p>	No further actions are required in relation to the new Local Plan.

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CON114	REP519		Filomen a	Dellamura		LCA SA 10	<p>I object to the proposal to bulldoze the existing community service building and replace it with a large residential development! The single storey building currently on the site previously provided a day centre and respite care centre for children. My view is that it should be refurbished and put to some similar use.</p> <p>It is unclear who will benefit from this development (other than the developers). The proposed 52 units are intended to house over 180 people. That will virtually double the current population of Slaithwaite Road with no proposed increase in infrastructure to support it. It is already difficult to get an appointment at the local GP surgery and the hospital services are under extreme pressure.</p> <p>To get 52 units (mixture of 1, 2 and 3 bedroom units) they must be at pretty minimal space standards and that's not healthy. A 3 bedroom property to house 5 people? How does that work for a family?</p> <p>This will potentially put another 50+ vehicles on to our local roads and in our resident's parking bays. We already get enough incoming vehicles from the Travelodge Hotel and on Sundays our streets are completely jammed full with parked cars from worshippers attending the new nearby church. My view is that all of the parking bays in the surrounding roads should be designated as 24 hour residents only and crucially the development itself must be car-free.</p> <p>I am a life-long Lewisham resident and have lived in Slaithwaite Road since the 1980s. A huge 5-6 storey building on what is currently an open site with grass and mature trees and shrubs will completely spoil the character of the area. No new building should rise above the height of the existing buildings (like that awful lump of a hotel) and shouldn't look into or over current resident's homes and gardens.</p> <p>Luckily my husband became aware of this consultation and if he had not told me I (along with my neighbours) would not even have known about this potential blight on our lives.</p> <p>I strongly object to the proposed development of the House on the Hill site at 47, Slaithwaite Road.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan's spatial strategy, site allocations and planning policies.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The new Local Plan is actively seeking to encourage sustainable growth of our Borough's places. That growth is being supported with investment into strategic and local sustainable travel networks, which will provide residents and communities with viable transport alternatives. The Council considers that during the lifespan of the new Local Plan, residents will be make the choice of either using sustainable travel modes or continuing with car ownership. Evidence demonstrates that societal changes in travel mode do have a profound on place. For these reasons contrary to the stated comments, the Council considers it entirely reasonable that during the plan period demand for private car parking provision</p>	No further actions are required in relation to the new Local Plan.

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								<p>will reduce. Advances in vehicle ownership models and technology (particularly AI) could further influence this trend.</p> <p>The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents.</p> <p>The suggestion that the formal consultations, at the Regulation 18 and Regulation 19 stages, were in some way designed to exclude participation is not supported by any evidence.</p> <p>The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement. Evidence is provided through the Regulation 19 Statement of Representations Procedure and the subsequent Regulation 19 Consultation Statement.</p>	
CON115	REP520						Representation has been removed at the request of the consultee		

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CON116	REP521		Gus	Newman		LCA SA 10	<p>I am writing to formally object to your plan for the House on the Hill at Slaithwaite Road.</p> <p>The site is currently an open area with a good deal of greenery and trees with a single-story building occupying some of the site. the adjacent buildings are two stories and include many Victorian buildings. the plan to turn this into multi story residential units will not fit into the local environment and will have an impact on the local environment will negatively effect the lives of residents in the local community.</p> <p>the previous plan was to put 36 residential units on the site but now, despite multiple objections from local residents, this has increased to 52 units.</p> <p>the plan has been designated as “vehicle light”, though your previous efforts to reduce vehicle usage have not been effective and have had a negative impact on congestion and pollution, e.g. the Tab church on Lewisham High street and the local LTN. The situation will be considerably worse with the additional vehicles associated with 52 new residential units. The area is already blighted by the lack of parking for the</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan’s spatial strategy, site allocations and planning policies.</p>	No further actions are required in relation to the new Local Plan.

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							<p>church, the nursery in Morley Road and the new hotel on the high street. Also, the proposed development would have a negative effect on the already overstretched dental, GP and Hospital services</p> <p>in addition, it is hard to believe that fitting 52 residential units on a site this size would provide decent family accommodation, something the borough actually needs.</p>	<p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The new Local Plan is actively seeking to encourage sustainable growth of our Borough's places. That growth is being supported with investment into strategic and local sustainable travel networks, which will provide residents and communities with viable transport alternatives. The Council considers that during the lifespan of the new Local Plan, residents will be make the choice of either using sustainable travel modes or continuing with car ownership. Evidence demonstrates that societal changes in travel mode do have a profound on place. For these reasons contrary to the stated comments, the Council considers it entirely reasonable that during the plan period demand for private car parking provision will reduce. Advances in vehicle ownership models and technology (particularly AI) could further influence this trend.</p>	
CON117	REP522		Natasha	Held		LCA SA 10	<p>I live at 57 Limes Grove, Lewisham SE13 6DD, which is diagonally opposite part of an area I understand has been flagged up for potential redevelopment into 52 residential units in the Lewisham Local Plan (House on the Hill, Slaithwaite Road, pp. 486-487).</p> <p>It has been extremely distressing to witness the state of managed decline of a well designed and built existing single storey structure on this site which formerly provided assisted housing for vulnerable people.</p> <p>If Lewisham Council is in desperate need to build new social accommodation; then I can appreciate how this plot of land appears underused. However, there is understandable concern from local residents regarding the impact that it is going to have on them with regard to reduced light, increased traffic, loss of beautiful blossom trees and the possibility of a new building that is a visual blight rather than an asset to the area.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan's spatial</p>	No further actions are required in relation to the new Local Plan.

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							<p>I would like to have reassurance that:</p> <ol style="list-style-type: none"> 1. Going forward, local residents will be consulted directly with on the scope and tender process of the design. 2. The scope for the building will not just be dictated by cost, but also factors of best use, appearance, materials, longevity and the environment. 3. The new building will: <ol style="list-style-type: none"> 3.1. continue to be for community use/benefit - ideally for either assisted or social housing? 3.2. not rise higher than the existing buildings around it. 3.3. be designed to high standard and with sensitivity to its surroundings and the occupants. I.e. If there is not enough space to fit 52 apartments healthily into a three storey building then the number should be reduced. 3.4. continue to be landscaped and inset away from the street. All good social housing blocks in the past have benefited from this. It gives all residents increased privacy and an elegance to the building, as opposed to current developer tendency to build right up to the pavement. 3.5. keep a good proportion of the existing trees (it is not the same to replace a mature tree with a young sapling which does not have the same capacity for absorbing carbon dioxide and especially if those saplings are not going to be properly maintained). 	<p>strategy, site allocations and planning policies.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The Council shares the respondent's concern for ensuring that new development secures an appropriate and proportionate level of new genuinely affordable housing provision. The new Local Plan seeks to achieve this objective through its spatial strategy for growth, its site allocations and planning policies – specifically in terms of the latter, new Local Plan Policy HO 3 Genuinely Affordable Housing. The Council considers this approach sound.</p> <p>The Council acknowledges the need to ensure that Green Infrastructure networks are fully integrated into the place-making that will deliver planned-for growth. The new Local Plan seeks to address this through its spatial strategy, site allocations and planning policies. The policies set out under Chapter 10 of the new Local Plan – Green Infrastructure seek to strengthen and secure local and strategic networks across and beyond the Borough. For clarity, the new Local Plan Policy LCA SA 10 already states that trees of quality located within the site, particularly along its boundary, must be retained.</p> <p>Although the Council acknowledges that residents and communities may find the changes that accompany new development challenging, planned-for growth does bring significant benefits. Most notably, new development brings necessary investment in the infrastructure</p>	

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								networks that will benefit not only new but also existing residents and communities. New development also serves a vehicle for regeneration. The new Local Plan's place shaping policies providing a platform for securing good quality design.	
CON118	REP523		Daniel	Gibbs		LCA SA 10	<p>I am writing to you to object to the development being proposed on the House on the Hill site, Slaithwaite Road.</p> <p>Reason being that sunlight to our property (both garden and into a bedroom) would be blocked by the height of the building. This would be particularly detrimental to us as our property receives minimal direct sunlight other than via these routes. The proposed construction would block 80%+ of the sunlight we receive.</p> <p>It would also impact the privacy of said bedroom and garden, which would be overlooked.</p> <p>This is in addition to the strain that would be put on local services.</p> <p>Our address is 3 St Mark's House, 32 - 34 Clarendon Rise, SE13 5EY.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The Council notes the comment that redevelopment will harm the amenity enjoyed by neighbouring residents. This is an important consideration – however, it is beyond the scope of plan-making. Nevertheless, it is a matter that will be explored through the Council's decision-taking responsibilities.</p>	No further actions are required in relation to the new Local Plan.
CON119	REP524		Niki	Sharp		LCA SA 10	<p>We would like to strongly oppose the proposed residential development at 47 Slaithwaite road (the House of the Hill).</p> <p>The council previously consulted on a 36 unit development on this site (which we also opposed) and is now conducting a further consultation for 52 residential units to be built in the next five years. We are extremely disappointed to see that, not only was our earlier submission clearly dismissed but that Lewisham Council has decided to substantially increase the number of units from 36 to 52 (over a 40% increase) and is intent on building these units imminently.</p> <p>Fundamentally, this development will result in great loss to the immediate and wider local area. At present, we understand that the site is used for community benefit and is listed in your plans as an overnight stay respite centre. Services such as this are vital for Lewisham and, given the lack of existing provision for a number of community services, should be supported and augmented rather than removed. For example, as a new mother, I noted the lack of a Children's Centre in central Lewisham for accessing services such as breastfeeding support.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan's spatial strategy, site allocations and planning policies.</p>	No further actions are required in relation to the new Local Plan.

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							<p>Instead, I had to travel to attend drop in centres in Catford, Ladywell or Deptford - something which was often difficult to do.</p> <p>Moverover, the existing services such as GP, dental, transport, parking, schooling, utilities, supermarkets, etc in Lewisham are already incredibly stretched. For example, I have struggled to find a local dentist since moving to Slaithwaite road over two years ago. One surgery I spoke to explained that they have been unable to take new NHS patients for at least the past four years due to oversubscription. As a further example, we have had difficulties with water pressure in our house in the past year. A technician from Thames Water assessed our property and advised that in part, this resulted from new developments diverting some of the existing pressure. Introducing additional properties can only enhance these issues. As a final example, parking pressures clearly exist in this area as the lower part of Slaithwaite road is often incredibly busy at peak times e.g. Church or nursery pick-ups. Each of these examples demonstrate that introducing residents for 52 (or even 36) new units would only exacerbate an already difficult situation.</p> <p>Further, it should not be forgotten that these services are already stretched at a time when a series of new developments near Lewisham station are nearing completion and several other sites in central Lewisham are being examined or consulted on for development. Once fully occupied, these flats will place even more pressure on the local area. Similarly, they will greatly affect the character and functionality of the neighbourhood by introducing comparatively high rise buildings and a significant increase in population to a previously calm and quiet residential area with no existing buildings over three storeys and where the previous site was only one storey high.</p> <p>Finally, introducing a residential development, particularly one of this size and height, will result in a loss of privacy, increased noise and/or potentially creates a nuisance for existing residents such as ourselves. This is not only while the units are being built (which will be incredibly disruptive to our day-to-day lives) but also once the units are in place and occupied. As well as the stark increase in population to the local community, given our position across the road from the site, this new residential structure could introduce flats that will look into the bedrooms on that side of our house. We will also lose our existing view of some of the greenery at House on the Hill and the city beyond. Again, this is exacerbated by the Council amending its proposal to build 52 units which we</p>	<p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The comments made in relation to infrastructure capacity, are noted. The Council continues to work closely with all its infrastructure partners to ensure that networks have the necessary capacity to accommodate the planned-for growth.</p> <p>The Council notes the comment that redevelopment will harm the amenity enjoyed by neighbouring residents. This is an important consideration – however, it is beyond the scope of plan-making. Nevertheless, it is a matter that will be explored through the Council’s decision-taking responsibilities.</p> <p>The comment that the new Local Plan needs to take a strategic approach to planning for growth is noted. For clarity, the Council advises that the new Local Plan be considered by readers in its entirety. The new Local Plan is comprised of its spatial strategy to growth, site allocations and planning policies. Collectively these provide a sound approach towards delivering planned-for growth across the plan period. The Council considers this a sound approach.</p>	

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							<p>assume will result in a higher structure than the previous 36 and take longer to build.</p> <p>While we understand the need for Lewisham Council to build additional housing, including as a result of the targets imposed on the Council, this needs to be done with sensitivity to the areas where new housing is introduced and with a strategic approach to planning for all of Lewisham. Removing community services, irrevocably changing the character of the area and placing additional burden on already struggling services to build a large development of residential units simply does not achieve this.</p> <p>We therefore recommend that the proposal to build 52 (or 36) units at 47 Slaithwaite road is abandoned and the site is instead invested in as a community space. We would be happy to discuss the proposals further with you.</p>		
CON120	REP525		Shashan k	Virmani		LCA SA 10	<p>I believe that there are plans to build residential accommodation at the corner of Clarendon Rise/Slaithwaite road.</p> <p>I live at 153 Clarendon Rise.</p> <p>I am concerned that if the building is too high, and not planned appropriately, then there will be problems such as</p> <ol style="list-style-type: none"> 1. Obstructions to the light we and our neighbours receive. 2. Our privacy will be affected as a high development will be able to look into our rooms, especially those of our child and our neighbours children. 3. There will be an increase in traffic and pressure on parking in the street. <p>Please ensure that any development does not raise the height of the building as it stands.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The Council notes the comment that redevelopment will harm the amenity enjoyed by neighbouring residents. This is an important consideration – however, it is beyond the scope of plan-making. Nevertheless, it is a matter that will be explored through the Council’s decision-taking responsibilities.</p>	No further actions are required in relation to the new Local Plan.
CON121	REP526		Benjami n	Whateley		LCA SA 10	<p>I am a resident of the borough of Lewisham. I live on 39 Slaithwaite Road SE136DJ, my name is Benjamin Whateley and I am opposed to the development of the House on the Hill in total, let alone from 36 to 52 units.</p> <p>The rate of development within the area is already dwarfing the landscape and pollution in Lewisham is a problem that this development will only exacerbate. The development of private housing in an already overdeveloped area is one I expect to be duly notified and consulted with, as a resident of Lewisham.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character</p>	No further actions are required in relation to the new Local Plan.

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							<p>This particular development will eradicate a building dedicated to care and outreach programs, how is it justifiable to replace such necessary resources with private accommodation?</p> <p>As a resident of Lewisham I would like to know how you plan to rectify the lack of clear consent with the community.</p>	<p>and appearance, and the potential capacity for new homes.</p> <p>The comments made in relation to infrastructure capacity, are noted. The Council continues to work closely with all its infrastructure partners to ensure that networks have the necessary capacity to accommodate the planned-for growth.</p>	
CON122	REP527		Katrine	Moeller		LCA SA 10	<p>I have very recently become aware that planning permission is being sought for a development on the road I live on, and that the consultation ends today. This comes as a great surprise to me - there is no signage I can see regarding this by the building proposed for development, nor have we been made directly aware at our address. In short, I do not think that I or my fellow residents have been given a reasonable chance to respond to this proposed development, which will have a massive impact on our lives here, both during a building process and onwards. I have learnt that your only response to previous opposition was to majorly increase the number of proposed dwellings on the site.</p> <p>As I have been informed, the House on the Hill, an already-in-use building with valuable old trees and varied greenery surrounding it, is proposed to be turned into, or replaced with, 52 housing units at up to 6 stories height. This in itself would be an incredible architectural and social imposition on a road with otherwise small to medium dwellings, adding noise and pollution to a functioning community without any care for both current and future residents.</p> <p>As you may be aware, there are many strained capacities in place in our area. Every Sunday, church goers flock to Lewisham in their cars, and Slaithwaite Road on those days has unending lines of illegally parked cars along every inch. Any significant increase in housing density on our road will add to this issue significantly, regardless of any intention to not prioritise cars in the development.</p> <p>The House on the Hill is home to many old trees that slightly lessen the impact of these masses of traffic, recently also added to by the new travelodge.</p> <p>The House on the Hill is home, also, to valued neighbours who leave the garden green and flowering and a rare local haven to varied wildlife. The house has clearly been built for community usage, making any planning decision - of such a radical departure from the surroundings as what is here proposed -</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 10.</p> <p>The Council remains committed to engaging with residents and local communities in the production of all its planning policy documents.</p> <p>The suggestion that the formal consultations, at the Regulation 18 and Regulation 19 stages, were in some way designed to exclude participation is not supported by any evidence.</p> <p>The Council can demonstrate that it has met and exceeded the legal requirements relating to public consultation and engagement. Evidence is provided through the Regulation 19 Statement of Representations Procedure and the subsequent Regulation 19 Consultation Statement.</p> <p>The scale of demand for new homes, in Lewisham and across London, is such that intensification must be considered by the plan-making process. Many places across Lewisham benefit from high level of accessibility to existing sustainable transport networks and access to jobs, facilities, and amenities. Many of these places have also been assessed as having capacity to accommodate change – in respect of their visual character and appearance. Technical evidence has informed the plan-making process. This is reflected by the new Local Plan’s spatial</p>	No further actions are required in relation to the new Local Plan.

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							<p>particularly egregious. That it is happening without appropriate, open consultation with residents is simply upsetting.</p> <p>I have lived here for almost 2 years. I am a nerd who reads signs I see in the street - a flyer from my neighbours is the first I hear of this proposal. I strongly oppose it in its current form, and urge that you reconsider and find a use for this property that respects the surroundings; the address' value as green space in a city where your prior developments have pushed further pollution up this particular street; and the impact the shape of your development will have both on the people who have their lives here, and the people you want to build theirs here in future. It is, simply put, too careless and too large for the locale.</p> <p>The House on the Hill is a valuable space for those who live there, and their neighbours. I welcome additional housing, but wish for it to be housing which will not reduce the welfare it is possible to experience within and outside its doors, as I see this proposal doing.</p> <p>Again, I cannot stress enough how incredibly disappointed I am that such a major development is happening without properly informing local residents, and allowing us our democratic right to be involved in the shape of our community.</p>	<p>strategy, site allocations and planning policies.</p> <p>The new Local Plan Policy LCA SA 10 House on the Hill at Slaithwaite Road, sets out the development opportunities, requirements, and guidelines for this site allocation. This includes an overview of the context in terms of visual character and appearance, and the potential capacity for new homes.</p> <p>The comments made in relation to infrastructure capacity, are noted. The Council continues to work closely with all its infrastructure partners to ensure that networks have the necessary capacity to accommodate the planned-for growth.</p> <p>The new Local Plan is actively seeking to encourage sustainable growth of our Borough's places. That growth is being supported with investment into strategic and local sustainable travel networks, which will provide residents and communities with viable transport alternatives. The Council considers that during the lifespan of the new Local Plan, residents will be make the choice of either using sustainable travel modes or continuing with car ownership. Evidence demonstrates that societal changes in travel mode do have a profound on place. For these reasons contrary to the stated comments, the Council considers it entirely reasonable that during the plan period demand for private car parking provision will reduce. Advances in vehicle ownership models and technology (particularly AI) could further influence this trend.</p>	
CON123	REP528	TfL			2	TR 04	<p>Thank you for giving Transport for London (TfL) the opportunity to comment on the Lewisham regulation 19 draft local plan.</p> <p>Please note that these comments represent the views of TfL officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The</p>	<p>The Council notes and welcomes the broad support offered to the new Local Plan within the representations made by Transport for London.</p> <p>The Council welcomes the recognition that the positive engagement undertaken with Transport for London during the previous</p>	No further action to be taken in relation to the new Local Plan.

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							<p>comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority. A separate response has been prepared by TTL Properties Limited to reflect TfL's interests as a landowner and potential developer.</p> <p>The London Plan was published in March 2021. Local plan policies and site allocations should be developed in general conformity with the London Plan policies and TfL's aims as set out in the Mayor's Transport Strategy. In particular, it is important that local plans support the Healthy Streets Approach (reducing car dependency and increasing active, efficient and sustainable travel), Vision Zero (the elimination of all deaths and serious injuries on London's transport system) and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.</p> <p>We are pleased to see that the Lewisham regulation 19 draft local plan builds on the previous version and takes on board much of our previous regulation 18 response to support these aims. We welcome the inclusion of Good Growth principles, as well as responding strongly to climate change and linking the proposed Bakerloo line extension (BLE) to supporting these goals. We appreciate the support for the BLE that is set out in the local plan and have provided comments to ensure consistency in the messaging regarding this project. There remain a couple areas that we would like to highlight to further strengthen the draft local plan and ensure internal consistency with the overarching Strategic Objectives and key policies.</p> <p>We strongly support the Council's proposed approach to car parking which supports car-free development in locations which are well-connected and car-lite development in locations which are less well-connected. We also welcome that the local plan identifies growth in well-connected locations which will further support the wider ambition to reduce car use and enable modal shift in the borough. Some additional changes could be made to provide further clarity to the intended application of policy TR4. A number of policies refer to parking requirements. These references should be removed to be in line with the London Plan and to be internally consistent with policy TR4.</p>	<p>Regulation 18 stage has informed the latest draft of the new Local Plan. Nevertheless, the Council also acknowledges that there may be further components of the new Local Plan that may benefit from further relatively minor modifications. The Council considers that these can be considered prior to submission and through the examination as necessary.</p> <p>The welcomes the respondent's stated support for the new Local Plan's approach towards car parking and the delivery of the proposed Bakerloo Line Extension.</p> <p>The Council remains committed to working constructively with all its infrastructure delivery partners to secure the necessary investment and improvements required to support planned-for growth.</p>	

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							<p>We welcome that the Council has incorporated many of our previous comments on the BLE. We previously strongly advised that the Council clearly articulate that the scenario with no BLE is not ‘preferred’ but is being considered to allow for the uncertainty of the BLE’s delivery within the plan period. It is very much welcomed that this scenario has been removed and that a much stronger rhetoric around the benefits of the BLE has been included. We would suggest some additional changes to further refine how the Plan relates to the BLE.</p> <p>We have set out a number of comments and proposed changes on the following pages which we hope are helpful. We look forward to continuing our work together in drafting the final document.</p>		
CON123	REP529	TfL			0	General	<p>General comments</p> <p>‘Public transport accessibility’ should be replaced with ‘public transport access’ or ‘access to public transport’, throughout the local plan, for consistency with the London Plan. ‘PTAL’ as defined in the London Plan means ‘public transport access level’.</p>	<p>The Council notes the respondent’s general comments. The proposed amended wording to the new Local Plan’s usage of “Public transport access” is not a matter of soundness. The Council concludes that the new Local Plan does not require this level of consistency, in wording, with the London Plan to be effective.</p> <p>The new Local Plan provides a definition of numerous technical terms under Appendix 2: Glossary. This includes a definition of the acronym PTAL, which corresponds with that noted in the representation.</p>	No further action to be taken in relation to the new Local Plan.
CON123	REP530	TfL			1	3 Strategic Objectives	<p>We support the Strategic Objectives set out and particularly welcome the amendment to Strategic Objective H21 to explicitly include the reduction of car use as part of the objective.</p> <p>We would additionally suggest that explicit reference is made to active travel alongside public transport: ‘Work in partnership with central government, the Greater London Authority, Transport for London, Network Rail and other stakeholders to reduce car use, increase active travel, and increase public transport capacity and accessibility across the Borough, as well as to unlock the development potential of specific localities and strategic sites, including through the delivery of the Bakerloo Line Extension.’</p> <p>As set out in our regulation 18 consultation response, the Council should consider explicitly providing policy support for Low Traffic Neighbourhoods in Strategic Objective G17: ‘Create an environment that encourages and enables people to pursue</p>	<p>The Council notes and welcomes the broad support offered by the respondent in relation to the new Local Plan Strategic Objectives Figure 3.2.</p> <p>Objective 21 The Council acknowledges the importance of active travel and that it falls within the scope of this Strategic Objective. The Council will consider the proposed amendment.</p> <p>Objective 17 The Council acknowledges that Low Traffic Neighbours can make a positive contribution towards influencing sustainable travel patterns and private vehicle usage. However, these are but one intervention/ infrastructure improvement</p>	<p>Objective 21 Consider suggested amendment –</p> <p><i>“Work in partnership with central government, the Greater London Authority, Transport for London, Network Rail and other stakeholders to reduce car use, increase active travel, and...”</i></p> <p>Objective 17 No further action to be taken in relation to the new Local Plan.</p>

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							active and healthy lifestyles irrespective of their age, ability or income, including by applying the Healthy Streets Approach, creating Low Traffic Neighbourhoods, making provision for accessible leisure and recreation opportunities and protecting the amenity of residents and visitors, particularly from pollution.'	that could be considered. On balance the Council considers that the existing wording is sufficiently flexible enough to accommodate the potential for Low Traffic Neighbourhoods should they arise.	
CON123	REP531	TfL			2	OL 01	<p>OL1: Delivering an Open Lewisham</p> <p>The amendments throughout Policy OL1 result in a more positively worded, clear and concise policy. In particular, we welcome the direct reference to the Healthy Streets Approach and proposals to improve connectivity between neighbourhoods by sustainable modes. While we welcome the explicit and repeated commitment to directing development to well-connected locations as well as Growth Nodes, Growth Corridors and Opportunity Areas, areas around stations are conspicuously absent. Areas within walking distance of rail stations have the potential to support a higher development capacity, even with a nominally low PTAL due to the relative connectivity provided by quick journey times to key interchanges, especially Lewisham and London Bridge stations. It is recommended OL1Aa. is amended: 'Directing new development to Growth Nodes, Regeneration Nodes and well-connected sites, including in Lewisham's Opportunity Areas of New Cross/Lewisham/Catford and Deptford Creek/ Greenwich Riverside and around stations, and carefully managing growth in these locations in response to local character'.</p> <p>The BLE is mentioned throughout this section positively and the Council makes a commitment to work towards the delivery of the BLE in paragraph 3.21. We appreciate that the local plan references the challenges of funding the BLE and therefore has stated that the spatial strategy is not reliant on the delivery of the BLE. We recommend that the plan clearly articulates that whilst the spatial strategy is not reliant on the BLE, the BLE remains a key spatial objective.</p>	<p>The Council notes the comments and welcomes the broad support for the new Local Plan's Spatial Strategy as set out under Policy OL 1 Delivering an Open Lewisham.</p> <p>The Council acknowledges that places adjoining existing railway stations may provide opportunities for sustainable growth. The new Local Plan Spatial Strategy reflects this by identifying Growth Nodes, Growth Corridors and Opportunity Areas that correspond to their locations. These are identified at Figure 3.3 Borough-wide Spatial Strategy Plan. However, access to sustainable travel networks, particularly the existing rail network, is not the sole factor driving sustainable development. Several of the Borough's existing railway stations are in predominantly suburban locations where the opportunities and the capacity to accommodate focussed growth are limited. This is clearly reflected in Figure 3.1 Character-led growth (Lewisham Characterisation Study, 2020). The Council considers that the approach set out under the new Local Plan Spatial Strategy Policy OL 1 is justified, effective and in accordance with national policy.</p> <p>The Council remains committed to supporting the delivery of the Bakerloo Line Extension. It is an important investment in sustainable travel infrastructure that may continue to be implemented over the life of the plan and beyond. Consequently, whilst the implementation of the Spatial Strategy will undoubtedly benefit from its early delivery – it is not predicated upon its completion to support the planned-for growth.</p>	No further action to be taken in relation to the new Local Plan.

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								Although the Council understands the intent of the representation, the suggested addition is unnecessary to make the new Local Plan sound.	
CON123	REP532	TfL			2	QD 03	Part B: We strongly support the additions to Part B of the policy which refer to the need to apply the Healthy Streets Approach to enable walking, cycling and use of public transport, as well as reducing vehicular speed and dominance. 5.23: Reference should additionally be made to TfL's Streetscape guidance3: 'Development proposals are also encouraged to refer to the Government's Manual for Streets and Transport for London's Streetscape guidance.'	The Council notes the comments and welcomes the support for the new Local Plan Policy QD 03. The Council notes the suggested amendment to Paragraph 5.23. The Council will consider the proposed addition.	Local Plan Policy QD 03 Paragraph 5.23 Consider suggested amendment – <i>"Development proposals are also encouraged to refer to the Government's Manual for Streets and Transport for London's Streetscape guidance..."</i>
CON123	REP533	TfL			2	HO 02	As requested in our regulation 18 consultation response, references to parking stress and requirements have been removed, which is welcomed. We now consider this policy to be in line with the London Plan.	The Council notes the comments and welcomes the support for the new Local Plan Policy HO 2 Optimising the use of small housing sites.	No further action to be taken in relation to the new Local Plan.
CON123	REP534	TfL			2	HO 05	Part Be.iii. should refer to policy TR4 (Parking), to clarify that parking considered for accommodation for older people should not be above the maximums in TR4: <u>'Access, parking and servicing arrangements, including for all types of vehicles expected to access the development, in accordance with Policies TR4 (Parking) and TR5 (Deliveries, Servicing and Construction).'</u> The last sentence of paragraph 7.52 should also be similarly amended, to clarify that parking rather than being 'adequate' should not be above the maximums in TR4 (Parking): <u>'Developments must also make adequate provision for access, parking and servicing for vehicles, with dropoff points for taxis, mini-buses and ambulances located near the building's principal entrance. Parking should be within the maximums in Policy TR4 (Parking).'</u>	Policy HO 05 Part B e iii) The Council notes the comments and suggested amendment to the new Local Plan Policy HO 05 Part B e iii). The Council does not consider this to be a matter of soundness. Whilst the suggested addition provides further information to the reader it is not necessary to make Policy HO 05 sound. The new Local Plan must be read and considered in its entirety. It is unnecessary, and impractical, for individual policies to cross reference every other policy that could be relevant for decision-taking. Paragraph 7.52 The Council notes the suggested amendment to Paragraph 5.23. The Council will consider the proposed addition.	Policy HO 05 Part B e iii) No further action to be taken in relation to the new Local Plan. Paragraph 7.52 Consider the suggested amendment - <i>"Developments must also make adequate provision for access, parking and servicing for vehicles, with drop-off points for taxis, mini-buses and ambulances located near the building's principal entrance. Parking must not exceed the maximum set out in Policy TR4 (Parking)."</i>
CON123	REP535	TfL			2	HO 10	Part Bc. should be amended to clarify that any parking provision should rather than 'adequate' as currently in HO10 be assessed through and subject to the maximums in policy TR4 (Parking): <u>'Access, parking and servicing arrangements for all vehicles likely to use the site, including emergency services, with any parking provided in accordance with TR4 (Parking).'</u>	The Council notes the comments and suggested amendment to the new Local Plan Policy HO 10 Part B c. The Council does not consider this to be a matter of soundness. Whilst the suggested addition provides further information to the reader it is not necessary to make Policy HO 05 sound. The new Local Plan must be read and considered in its entirety. Proposals for Gypsy and Traveller accommodation	No further action to be taken in relation to the new Local Plan.

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								will consider all the new Local Plan's policy requirements.	
CON123	REP536	TfL			2	EC 09	We welcome the inclusion of the need to consult with TfL in paragraph 8.52, but request the following re-wording to protect the BLE: 'Applicants will be expected to consult Network Rail and Transport for London on development and design options in order to ensure there is no adverse impact on the public highway and rail network, or impacts that may preclude, prejudice or delay the delivery of planned transport infrastructure, including the Bakerloo line extension.'	Paragraph 8.52 The Council notes the suggested amendment to Paragraph 8.52. The Council will consider the proposed addition.	Paragraph 8.52 Consider the suggested amendment – <i>"Applicants will be expected to consult Network Rail and Transport for London on development and design options in order to ensure there is no adverse impact on the public highway and rail network, or preclude, prejudice or delay the delivery of planned transport infrastructure, including the Bakerloo line extension."</i>
CON123	REP537	TfL			2	GR 02	The policy wording would appear to be more flexible for allowing works on open spaces, subject to alternative provisions or improvements. However, the policy should be amended to make explicit that temporary works relating to the BLE, such as construction and enabling works, would be an acceptable form of development.	<p>The Council notes the comments made in relation to the new Local Plan Policy GR 02. The Council does not consider the matter raised to be an issue of soundness.</p> <p>The acknowledges that the proposed Bakerloo Line Extension is an important improvement to the strategic transport network. The Council continues to strongly support the investment and implementation in the Bakerloo Line Extension. It is an important infrastructure improvement that will bring significant benefits to the Borough, South East London, and the wider Capital as a whole. It is noted that its completion is likely to take place beyond the new Local Plan's plan period.</p> <p>The possible need to temporarily utilise public spaces – whether within the public street realm or upon designated open spaces (among others) – is acknowledged by the Council. However, at this point it is unclear whether the specific requirement to temporarily use public open space for works is unknown. As these uses will be temporary, and the Council will seek the full restoration of any provision utilised; there is no requirement for the policy to cover this possible eventuality – as the</p>	No further action to be taken in relation to the new Local Plan.

Consul tee Ref	Comme nt Ref	Organisatio n (if relevant)	First name	Last name	Part	Section, policy, or paragraph	Comment	Officer response	Action
								policy is fundamentally concerned with preventing the permanent loss of existing provision.	
CON123	REP538	TfL			2	SD 06	<p>Policy SD6 is supported, and we welcome the added reference to the Healthy Streets Approach in the supporting text of the policy. As stated in our regulation 18 comments, given car use is one of the main contributors to NOx, PM2.5 and PM10 emissions, the impact of developments with car parking and the resulting increase in car use should be explicitly referred to as well. It is recommended the last two sentences of paragraph 11.33 are amended: ‘The Healthy Streets Approach should be used wherever possible to help address poor air quality. <u>As car use is one of the main contributors to NOx, PM2.5 and PM10 emissions, where developments provide car parking, the resulting impact on car use should be considered.</u></p> <p>Development proposals will be considered taking into account individual and cumulative impacts of development in an area, consistent with national policy.’</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy SD 06. The Council does not consider the matter raised to be an issue of soundness.</p> <p>There are many factors that contribute towards NOx, PM2.5 and PM10 – perhaps most significantly an increasing population. The respondent has not suggested that the Policy SD 06 wording be amended to manage population.</p> <p>Equally there are other factors/ interventions, many of which sit outside of the plan-making process, that will influence sustainable travel choices and private vehicle use/ ownership. The Council considers it conceivable that advances in vehicle technology (power and AI) may during the lifespan of the new Local Plan have a profound impact on this matter.</p>	No further action to be taken in relation to the new Local Plan.
CON123	REP539	TfL			2	TR 01	<p>Policy TR1 is supported. In particular, we welcome the changes in TR1 which refer to ‘enabling’ mode shift and walking and cycling. We also welcome the addition to TR1D of ‘d. Expansion of cycle hire’ in response to our comments in the regulation 18 consultation. Part C: We welcome the intention to safeguard sites for construction and delivery of the critical transport improvements and permanent infrastructure, to enable the borough to deliver its spatial objectives.</p> <p>However, not addressed from our comments made on the regulation 18 local plan, part C refers to ‘safeguarding’. A distinction should be made between the ‘safeguarding’ as a matter of local plan policy, and the formal safeguarding directions made by the Secretary of State for Transport on 1 March 2021 in respect of the BLE. The latter must be complied with under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO 2015). In relation to the former, we acknowledge there can be a form of policy-based ‘safeguarding’ on a strategic basis via the London Plan and at a more detailed local level via this local plan, but we consider further specificity would be clearer. In particular, the current draft local plan is not sufficiently granular and should set out more clearly the reasons for the</p>	<p>Policy TR 01 D The Council notes and welcomes the support offered in relation to the new Local Plan Policy TR 01 – specifically in relation to supporting cycle infrastructure and the safeguarding of works sites required for the delivery of critical transport improvements.</p> <p>Policy TR 01 C The Council notes the comments raised in relation to the different definitions of the terms “safeguarding” and how these may apply in respect of the proposed Bakerloo Line Extension. The Council acknowledges that such technical differences may exist but concludes that this is not a fundamental matter of soundness for the new Local Plan.</p> <p>Paragraph 12.10 The Council notes the comments made by the respondent in relation to this</p>	<p>No further action to be taken in relation to the new Local Plan.</p> <p>Infrastructure Delivery Plan Consider the suggested removal of references to the New Cross to Lewisham Overground extension as part of the regular review of the Infrastructure Delivery Plan.</p>

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							<p>policy-based safeguarding and the implications thereof on a site-by-site basis. This should cover stations, work sites, the line and corridor and associated works (more detail of which TfL can provide upon request).</p> <p>Further to our regulation 18 request, that explanatory paragraph 12.10 is now included in the local plan is supported, including its details of the Secretary of State's safeguarding directions, that these have been included on the policies map, that the BLE will make a higher number of homes possible within the existing and potential Opportunity Areas, and that it will deliver a transport interchange at Lewisham along with the benefits of this.</p> <p>Throughout the local plan there is reference to both the 'Secretary of State' and 'Ministerial' safeguarding directions. A single reference should be used to provide clarity. 'Secretary of State' is preferable, in accordance with the wording of the directions and the DMPO 2015.</p> <p>Table 12.1 Indicative list of strategic transport schemes: The table does not define the timeframes associated with each project. In particular, for the BLE, 'medium' is both ambiguous and implies a shorter than anticipated delivery timescale. 'Metroisation' as described in the Mayor's Transport Strategy would apply to all National Rail services in south and southeast London, rather than to the London Overground, and the table should be amended to read: "Metroisation" of London Overground-National Rail services'. The table should additionally be amended to read: 'Surrey Canal Road station'.</p> <p>We note the removal of 'New Cross to Lewisham Overground extension', however this still appears in the Infrastructure Delivery Plan. This scheme should be removed from the Infrastructure Delivery Plan for consistency with the local plan.</p> <p>Part D: We support the Council's commitment to improving the public transport network, including improving bus priority and bus stop infrastructure in Policy TR1D. TfL's Bus Action Plan⁴ was published in March 2022, and we would suggest the Council include reference to the Bus Action Plan in the explanatory text.</p>	<p>supporting paragraph. Whilst the delivery of the Bakerloo Line Extension may enhance the prospects for sustainable development in accordance with the new Local Plan's Spatial Strategy, it remains uncertain as to when the improvements will commence and complete. Consequently, it remains entirely correct for the new Local Plan to consider the improvement within a strategic timeframe.</p> <p>Secretary of State versus Ministerial The Council considers that this is not a matter of soundness. It is entirely reasonable to assume that readers will understand the relationship between the two titles.</p> <p>Table 12.1 The Council notes the comments and highlights that the Table is only intended to provide an indicative overview of the Borough's strategic transport schemes. The Council notes that the respondent has not provided a defined timeline for the commencement and completion of the proposed Bakerloo Line Extension. Should they provide evidence that the proposed scheme is longer-term, potentially beyond the horizon of the new Local Plan, then the Council could consider an appropriate amendment to Table 12.1.</p> <p>Infrastructure Delivery Plan The Council notes the comments made in relation to the current Infrastructure Delivery Plan. This is not in itself a matter of soundness. Nevertheless, the Council will seek to amend this accordingly.</p>	
CON123	REP540	TfL			2	TR 02	<p>This policy supports the BLE and this is welcomed.</p> <p>Part B: The following amendments are recommended, for clarity: 'Development proposals must demonstrate that they will facilitate and not preclude the delivery of the BLE, with reference to Policy TR1 (Sustainable transport and movement).</p>	<p>The Council welcomes the broad level of support offered in relation to the new Local Plan Policy TR 02.</p> <p>The Council continues to strongly support the investment and implementation in the</p>	No further action to be taken in relation to the new Local Plan.

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							<p>They Development proposals must take into account taking into account Ministerial safeguarding Directions the Secretary of State for Transport BLE safeguarding directions which were issued on 1 March 2021, the supporting safeguarding directions guidance, and relevant Mayor of London / Transport for London infrastructure requirements and/or feasibility studies associated with BLE phases 1 and 2, and should consult with relevant transport bodies at the an early stage of the planning process;.’</p> <p>Part C: Our view is that only sites in the safeguarded zone (that is, the area to which the Secretary of State’s safeguarding directions apply) should need to demonstrate how they address the infrastructure requirements of BLE such as running tunnels, noise and vibration. That this would be required by the policy for any development within 400 metres of a proposed station or safeguarded zone is unnecessary.</p> <p>Furthermore, requirements for transport assessments and transport statements are already set out in local plan policy TR1F (Assessing and mitigating transport impacts) and London Plan policy T4B (Assessing and mitigating transport impacts), and we consider that these should be relied on for assessing sites near the BLE, rather than specifying through this policy any distance from stations that should be considered. For strategic developments, for example, the impact on the nearest stations should be assessed in a transport assessment and mitigated, regardless of whether they are any specified distance from a development site. We would welcome further discussion on this point in particular, as setting a threshold of 400 metres would be an unhelpful precedent and something we would object to strongly.</p> <p>As such, the text in part C should be amended to remove the reference to 400 metres, and subsequently the last two sentences of part C regarding potential public realm and transport infrastructure enhancements should be moved to part D of the policy because they should apply to beyond the safeguarded area, as follows:</p> <p>C: Development proposals on sites located within 400 metres of a proposed the Bakerloo line BLE station or safeguarded area, under the Secretary of State for Transport’s BLE safeguarding directions, must (unless exempted in those directions) demonstrate that the proposed development will not preclude or delay the delivery or operation of the BLE, will not lead to excessive cost in the delivery or operation of the BLE, and must will be compatible with the BLE during delivery</p>	<p>Bakerloo Line Extension. It is an important infrastructure improvement that will bring significant benefits to the Borough, South East London, and the wider Capital as a whole.</p> <p>Policy TR 02 B The Council notes the comments and suggested amendments made in respect of the new Local Plan Policy TR 02 B. Whilst the amendments provide additional information (that is available elsewhere), the Council does not consider them necessary to ensure the overall soundness of the Plan.</p> <p>Policy TR 02 C The Council notes the comments and suggested amendments made in respect of the new Local Plan Policy TR 02 C. Safeguarding zones are by their nature arbitrary. The approach set out under the new Local Plan Policy TR 02 C is positively prepared and effective.</p> <p>Policy TR 02 D The Council notes the comments and suggested amendments made in respect of the new Local Plan Policy TR 02 D. The Council does not consider the suggested amendments necessary to ensure the overall soundness of the Plan. These are matters already addressed through other Local Plan policies.</p> <p>Paragraph 12.12 The Council notes the comments and suggested amendments made in respect of Paragraph 12.12. As set out above the Council does not consider this necessary to ensure the soundness of the Plan.</p>	

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							<p>and operation (for example, in relation to vibration from the tunnels), both during construction and in operation.</p> <p>Foundation and basement design will be particularly critical for over tunnel alignments, ground level needs at stations and for other work sites. Development proposals must also be designed to optimise the accessibility provided by the introduction of the BLE into the local area. This may include provision for new or improved public realm and transport infrastructure enhancements.</p> <p>D: Development proposals should optimise the use of land and capacity of sites taking into account the BLE and future improvements to Public Transport Access Levels enabled by its delivery. The Council will seek to ensure that development on sites in proximity to existing, planned or potential future Bakerloo line stations is appropriately phased in order to secure the most beneficial use of land, particularly to help meet Lewisham’s housing needs. <u>Development proposals must also be designed to optimise the accessibility provided by the introduction of the BLE into the local area. This may include provision for new or improved public realm and transport infrastructure enhancements.</u></p> <p>The explanatory paragraph 12.12 should also be amended to clarify the safeguarding requirements and separate the matters of public realm and transport infrastructure enhancements from safeguarding, in accordance with the above recommendations on parts C and D of the policy.</p> <p>Part D: It would be helpful to set out in more detail when phasing may be required and what will be required from the developer in terms of documents and actions.</p>		
CON123	REP541	TfL			2	TR 03	<p>Part C: The ‘key movement corridors’ are not defined in this policy. It would be helpful to include a table or figure identifying these, so that they can be coordinated with other walking and cycling routes referred to in part D of the policy. This will enable developments to include appropriate Healthy Streets improvements as part of the scheme or secured through section 106 or section 278 agreements. A plan-led approach to delivery will enable coordination between development and funding for improvements.</p> <p>The approach to transform major arterials (including portions of the A20 and the A205 South Circular) in policy TR3 and explained in paragraph 12.17 in line with Healthy Streets is strongly supported, but more specificity would be encouraged in identifying what these public realm improvements and new walking and cycling infrastructure would look like.</p>	<p>The Council notes and welcomes the broad level of support offered in relation to the new Local Plan Policy TR 03 Healthy streets as part of healthy neighbourhoods.</p> <p>Policy TR 04 C The Council notes the comments made in relation to the term “key movement corridors”. The Council considers that the policy wording is clear that these are general movement corridors that typically radiate from and link centres, hubs, and other places across the Borough. It is not practical for the new Local Plan to seek to map, define or illustrate such networks. Inevitably, the definition of such networks</p>	No further action to be taken in relation to the new Local Plan.

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							<p>Part I regarding active travel training and funding is welcomed and could be supported by adding the following to paragraph 12.21: <u>'Funding can be secured from developments for projects and programmes such as cycle training to support this.'</u></p> <p>Part G: A reference to Low Traffic Neighbourhoods as a type of intervention could be added to the last sentence of this part: <u>'This may include interventions to reduce, re-route or calm vehicular traffic (particularly around schools and other community facilities) and/or lower speed limits in localities, as well as to enhance the quality and safety of the walking and cycle environment, or to create Low Traffic Neighbourhoods'.</u></p>	<p>occurs as part of the decision-taking process – for example, through master planning of large sites, or through design and access statements. Nevertheless, the new Local Plan provides a strategic insight to these networks through its Spatial Strategy – for example, through Figure 3.2. Additionally, Figures 12.1 and 12.4 provide the reader with an overview of how travel networks interact and connect places across the Borough. In conclusion, amendments are unnecessary to ensure the soundness of the new Local Plan.</p> <p>Policy TR 04 G The Council acknowledges that references to specific intervention typologies could be included across the entirety of the new Local Plan. However, specific intervention typologies, such as Low Traffic Neighbourhoods, have a habit of evolving into new initiatives that may follow a different nomenclature. The existing policy wording provides sufficient detail to allow for a wide range of possible initiatives that could correspond to the currently vogue Low Traffic Neighbourhoods. Consequently, the Council concludes that amendments are unnecessary to ensure the soundness of the new Local Plan.</p> <p>Policy TR 04 I The Council notes the comments and suggested amendment. Although the Council understands and appreciates the reason why the respondent may seek this addition to the policy text, its inclusion is not necessary to ensure the sound of the new Local Plan.</p> <p>Paragraph 12.17 The Council notes the comments and suggested addition to this supporting text paragraph. The Council highlights that it is not the purpose of Policy TR 04 or of the wider new Local Plan to specify public realm, walking and cycling infrastructure</p>	

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								improvements. The specification of such improvements is best undertaken either through supplementary design guidance (provided by either the Council, Transport for London, or the Government), or the decision-taking process. In conclusion, amendments are unnecessary to ensure the soundness of the new Local Plan.	
CON123	REP542	TfL			2	TR 04	<p>Part A: This approach to prioritising car-free and car-lite development is in accordance with policy T6 (Car parking) of the London Plan and is supported.</p> <p>It is recommended that the meaning of car-lite is clarified in the policy: ‘In line with the London Plan, car-free development should be the starting point for all development proposals in places that are, or are planned to be well-connected by public transport, with developments elsewhere designed to be car-lite, with parking minimised as far as possible.’</p> <p>Part B: It is welcomed that car-free development is now proposed to be supported in areas of lower PTAL, subject to availability of alternative transport infrastructure. However, the need for a requirement for locations to be ‘highly accessible’ in addition to ‘well-connected’ already introduced in part A is not supported. ‘Well-connected’ is considered sufficient, and the difference between the two terms is not explained. The first sentence of part B should therefore be amended to: ‘Development proposals for car-free development will be supported in locations well connected by public transport. where they are located in highly accessible and well connected locations.’</p> <p>The items a.–d. under Part B are supported as being appropriate additional locations for car-free development. However, the structure of the list in part B is unclear: item a. ends with ‘or’, item b. ends with ‘and’ and item c. ends with no conjunction. The relationship between items a.–d. should be clarified. For item c., while controlled parking zones are strongly supported, London Plan policy T6C (Car parking) states that a lack of controlled parking zones should not prevent development.</p> <p>Parts C and D: These are in accordance with the London Plan parking maximums and disabled parking requirements and so are supported. The following should be added to Part D to reinforce London Plan policy T6.1H (Residential parking): ‘Residential disabled persons parking should not be allocated</p>	<p>The Council welcomes the broad level of support offered in relation to the new Local Plan Policy TR 04 Parking.</p> <p>Definition of Car-Lite The Council considers that a more appropriate location for this definition is under the new Local Plan Appendix 2: Glossary.</p> <p>Policy TR 04 B The Council notes the comments and considers that this is not a matter of soundness.</p> <p>Policy TR 04 B a – d The Council acknowledges that there may be a need to clarify the use of the words “or” and “and”.</p> <p>Policy TR 04 C and D The Council notes the detailed requirements made by the respondent in relation to the provision of new disabled persons’ parking. The suggested amendments are matters of detail that go beyond the intended scope of the policy. These are matters already addressed under London Plan Policy T6.1 Residential Parking. They do not need to be repeated in the new Local Plan to ensure that it is sound.</p> <p>Policy TR 04 I – K The Council notes the detailed requirements made by the respondent in relation to the consideration and provision of electric vehicle charging within PDMPs. The suggested amendments are matters of detail that go beyond the intended scope</p>	<p>No further action to be taken in relation to the new Local Plan.</p> <p>Definition of Car-Lite The Council will consider amending the new Local Plan Appendix 2: Glossary, to include a definition of the term car lite.</p> <p>Policy TR 04 B a – d The Council will consider and clarify accordingly the use of the words “or” and “and”.</p> <p>Paragraph 12.27 The Council to consider the following amendment –</p> <p>“Measures such as the use of car clubs and electrically charged or Ultra-Low Emission vehicles can provide an alternative to car ownership and conventional gas fuelled vehicles.”</p> <p>New Paragraph 12.28</p> <p><i>“Car clubs can serve to support car-free development. They are best implemented in association with reductions in the overall number of parking spaces being provided in an area. Simply adding car club cars to areas with lots of parking is not an effective way to reduce car ownership or use and only serves to increase the dominance of vehicles on the streets In new developments. Consequently, car clubs should be deployed as a</i></p>

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							<p><u>to specific dwellings, so that it does not end up being used as general parking if there is a turnover of residents.'</u></p> <p>Parts E and F: The cycle parking requirements accord with the London Plan and so are supported. The requirement for provision of cycle hire and cargo cycle space for certain developments where ent feasible is supported.</p> <p>Part H: The requirement of car-free development to be parking permit free is welcomed.</p> <p>Parts I to K: The electric vehicle charging and parking design and management plan (PDMP) requirements are consistent with the London Plan and so are supported. The following should be added to Part I to reinforce London Plan policy T6.1B (Residential parking): <u>'Parking spaces within communal car parking facilities should be leased rather than sold.'</u></p> <p>Explanation of the purpose of PDMPs should be added as a new paragraph 12.29: <u>'PDMPs allow consideration of the provision of electric vehicle charging points, how disabled persons parking spaces will be provided upon request, how space might be converted in future as needs change, strategies to reduce car parking over time as sustainable transport infrastructure is improved and car ownership levels decrease, and how cycle parking areas will be designed and managed.'</u></p> <p>Paragraph 12.24: The meaning of this explanatory text is somewhat unclear. It notes that the Council will work with stakeholders including TfL and National Rail to 'address step-free access and deliver this provision which is necessary for inclusive and well-connected neighbourhoods.' It is unclear what 'this provision' refers to. If it refers to step-free access, this would be supported, but the wording and placement of the text in the explanatory text of policy TR4 (Parking) implies that it may be about car parking. If this is the case, the lack of step-free access does not justify higher car parking provision on high PTAL sites. The paragraph should be revised and moved or deleted from the plan.</p> <p>It is recommended that the issue of car clubs is separated from that of electric vehicles in paragraph 12.27, to better indicate the potential benefits of car clubs, with additional guidance on how car clubs can be used to lower overall levels of car parking and encourage sustainable transport choices as well as noting their limitations and circumstances in which they would not be supported. Paragraph 12.27 should be amended: <u>'The use of</u></p>	<p>of the policy. These are matters are already addressed under London Plan Policy T6.1 Residential Parking. They do not need to be repeated in the new Local Plan to ensure that it is sound.</p> <p>The Council also notes the suggested amendment to include additional text setting out the purpose of PDMPs as part of the Policy's supporting text. The suggested amendments are matters of detail that go beyond the intended scope of the policy. These are matters are already addressed under London Plan Policy T6.1 Residential Parking Paragraph 10.6.11. They do not need to be repeated in the new Local Plan to ensure that it is sound.</p> <p>Paragraph 12.24 The Council notes the comments made in respect of this supporting text paragraph. Upon further careful consideration the Council concludes that the text is clear and unambiguous. Step-free access is the sole form of infrastructure improvement referenced within this paragraph. Consequently, the reference to the delivery of "this provision" can only refer to step-free access.</p> <p>Paragraph 12.27 The Council has considered the respondent's comments and suggested amendments. Although the Council understands the respondent's logic, the suggested amendments are considered unsound. As an alternative the Council could consider an alternative amendment that provides further clarity.</p> <p>New Paragraph 12.28 The Council could consider the introduction of an new paragraph, with consequential paragraph numbering changes, in order to provide further guidance on the matter of car clubs.</p>	<p><i>means to reduce the overall volume of parking, specifically in locations d where they can provide for occasional car use for households that are prevented from owning their own car, where parking levels are very low, and they should include electric vehicle charging points."</i></p>

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							<p>car clubs and electrically charged or Ultra-Low Emission vehicles can provide an alternative to car ownership and conventional gas fuelled vehicles. Development proposals must make appropriate Policy Page Comment/Amendment provision for rapid electrical vehicle charging points, also having regard to the Council's Low Emission Vehicle Charging Strategy. However in light of the climate emergency the use of car clubs and Ultra-Low Emission vehicles will need to be carefully managed. Whilst electric vehicles reduce tailpipe emissions they are carbon-intensive to produce and still add to congestion, road danger and severance. They also generate Particulate Matter through tyre and brake wear and can therefore contribute to poor air quality.'</p> <p>A new paragraph 12.28 should provide explanation on car clubs, such as: <u>'Car clubs can be useful in supporting car-free development. The best way to implement them is with an associated reduction in the overall number of parking spaces in an area. Simply adding car club cars to areas with lots of parking is not an effective way to reduce car ownership or use and is rather more likely to increase the dominance of vehicles on the streets In new developments, car clubs should be deployed as a means to reduce the overall volume of parking and where they can provide for occasional car use for households that are prevented from owning their own car, where parking levels are very low, and they should include electric vehicle charging points.'</u></p>		
CON123	REP543	TfL			2	TR 05	The approach to requiring sustainable freight, off-street deliveries and operational parking, and demonstration of this through delivery and servicing plans, is supported.	The Council welcomes the support offered to the new Local Plan Policy TR 05.	No further action to be taken in relation to the new Local Plan.
CON123	REP544	TfL			2	TR 06	Part Ac. currently could imply that any loss of general on-street parking for use by taxis or private hire vehicles would be unacceptable. However, the use of on-street space for these purposes may result in fewer car trips and could provide additional flexibility which accords with the London Plan Good Growth objective of making the best use of land. Part Ac. should be rephrased to remove reference to on-street parking: 'It is suitably demonstrated that there will be no adverse impact on amenity and the highway network, including existing on-street parking provision '	The Council notes the comments and suggested amendment to the new Local Plan Policy TR 06. The acknowledges that improved taxi or private hire provision could contribute towards the London Plan Good Growth objective of making the best use of land. The Council will consider the suggested amendment.	Consider amending the wording of the new Local Plan Policy TR 06 A c – <i>"It is suitably demonstrated that there will be no adverse impact on amenity and the highway network, including existing on-street parking provision; "</i>
CON123	REP545	TfL			2	TR 07	Part De.: Requiring a minimum residual footway should apply to any road, not just 'main' roads. In addition, it would be helpful if the policy referred to what a suitable minimum width would be or how this could be determined. This part should be amended to: 'If located on a main road or walking route, a minimum residual footway is provided, <u>to ensure comfort and safety for all road users</u> '.	<p>The Council notes the comments and suggested amendments to the new Local Plan Policy TR 07 Digital Connectivity.</p> <p>Policy TR 07 D e The Council notes the comments made in respect of this component part of the</p>	<p>No further action to be taken in relation to the new Local Plan.</p> <p>Paragraph 12.44 Correct the wording of the supporting text in accordance with</p>

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							In paragraph 12.44 of the explanatory text, the reference to 1.8m should be replaced with 2m, which is the minimum set out in the Manual for Streets ⁵ , Inclusive Mobility ⁶ and TfL's Streetscape Guidance. ⁷ The reference to ensuring appropriate pedestrian flow is supported and TfL guidance should also be referenced to support this: <u>'The Government guidance documents Manual for Streets and Inclusive Mobility, as well as Transport for London's Streetscape Guidance and Pedestrian Comfort Guidance'</u> ⁸ should be referred to for guidance on appropriate residual distances where development is located on a main road or walking route . In town centres and other high traffic areas, the minimum residual distance of 1.8 2 metres may not be sufficient to enable appropriate pedestrian flow, and the minimum width will be determined based on the number of pedestrians per square metre and pedestrian flows per minute.'	<p>policy. Whilst the intention is understood, the Council highlights that the new Local Plan Policy TR 07 is focussed upon the provision and implementation of digital infrastructure. The reference within this component of the Policy relating to where digital infrastructure is installed alongside of or forming part of parallel pedestrian provision. On that basis, the Council considers the policy sound.</p> <p>Paragraph 12.44 The Council welcomes the identification of the factual error relating to minimum distances. The Council will seek to amend this error as a minor modification.</p> <p>The Council has considered the other suggested additions to the new Local Plan Paragraph 12.44 and concluded that these are unnecessary to ensure soundness.</p>	the factual position through a minor modification.
CON123	REP546	TfL			3	LCA SA 01	This site is in PTAL 6b and the existing planning permission allows for the provision of 500 car parking spaces. There is no mention of cycle parking in this phased development. Since there are various phases of this development, we encourage any future changes and planning permissions be geared towards car-free development for both residential and non-residential uses. A reduction in car parking provision will achieve better air quality in this air quality focus area, as well as make better use of land and reduce costs. Dedicated cycle lanes should also be considered to improve safety and encourage people to cycle.	The Council notes the comments made in relation to the new Local Plan Policy LCA SA 01 and its associated supporting text Paragraphs 14.16 – 14.9. The references within the supporting text to the site allocation's planning history are intended to provide high-level overview of recent decision-taking. They are not intended to be definitive. It is highlighted that the respondent, Transport for London, was and continues to be involved across the decision-taking process for this site allocation. They have opportunities to inform the decision-taking for this site allocation. Finally, it is noted that this site allocation is at an advanced stage in the development process – it is being implemented and units are in the process of being occupied. Further amendments and additions to the Policy are unnecessary to ensure soundness.	No further action to be taken in relation to the new Local Plan.
CON123	REP547	TfL			3	LCA SA 05	Paragraph 14.45.9 which requires the retention or re-provision of the bus stop and stand facility that are currently provided on this site is supported.	The Council notes the support offered to the new Local Plan Policy LCA SA 05 Development Guidelines Point 9.	No further action to be taken in relation to the new Local Plan.
CON123	REP548	TfL			3	LCA SA 06	The existing bus stand at Thurston Road is the identified site for a BLE station box. The layout of the new station is unlikely to permit a sufficient bus stand to return to the site once the	The Council notes the comments made in relation to the new Local Plan Policy LCA SA 06 Thurston Road Bus Station –	No further action to be taken in relation to the new Local Plan.

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							<p>station works are complete. However, this has not been technically assessed and proven, although it is highly likely to be the case. Current feasibility studies will help identify what scope exists to return the bus stand back to Thurston Road. The lack of provision for a temporary bus stand within the local plan is concerning.</p> <p>Following extensive investigation work and meetings with Lewisham, Molesworth Street Car Park had been identified as a preferred site to locate a bus stand during the construction of the station. While in the regulation 18 version of the local plan Molesworth Car Park was referred to as a site allocation, it has since been removed. We had understood that the use of the car park as a temporary bus stand would be identified in the site allocations, similar to that shown in the regulation 18 local plan. The removal of this site allocation risks the protection of land in the town centre to facilitate a bus stand. The delivery of a temporary bus stand within the town centre is critical to permitting the delivery of the BLE and operation of the bus network in this area. Sufficient reassurances are needed within the local plan to enable TfL to deliver the strategic infrastructure widely documented within the local plan.</p> <p>We strongly recommend that the local plan identifies and commits to potential alternative sites which could accommodate a future bus stand within the locality of the Gateway. The existing bus services are relied upon and primarily used by Lewisham residents for travel to work, for shopping and for other needs in the borough and must be considered alongside promoting the delivery of the BLE.</p> <p>TfL asks that provision is made for accommodating a bus stand within the site allocations</p>	<p>specifically in relation to the possible, but unconfirmed, need for an additional bus stand at or within the Thurston Road area.</p> <p>For clarity, it is noted that the new Local Plan Policy LCA SA 06 requires under Paragraph 14.48 –</p> <p><i>“3. The existing bus standing capacity and associated facilities must be temporarily re-located.”</i></p> <p>And under Paragraph 14.49 –</p> <p><i>“1. The design of any station improvements and/or new BLE entrances should carefully consider TFL requirements regarding bus standing and associated facilities.”</i></p> <p>Given that detailed design work continues in respect of the proposed improvements the existing wording is considered sufficiently sound. The Council highlights that no evidence has been provided to demonstrate that it is not possible to accommodate the Bakerloo Line Extension Station Box and bus stand provision within the site allocation.</p> <p>The Council will continue to work with Transport for London to secure these improvements and meet the needs of the sustainable transport network to ensure that it continues to be fit for purpose.</p>	
CON123	REP549	TfL			3	LCA SA 07	Paragraphs 14.52.2 and 14.53.5 that require that development not prejudice the delivery of the BLE and identify that the BLE could affect redevelopment of the site are supported	The Council welcomes the support offered to the new Local Plan Policy LCA SA 07.	No further action to be taken in relation to the new Local Plan.
CON123	REP550	TfL			3	LCA SA 13	The site allocation should emphasise the need for comprehensive development of the whole site, with concern that the current application under consideration does not consider the replacement of the existing temporary building and raises some conflicts with its future replacement.	The Council notes the comments made in relation to the new Local Plan Policy LCA SA 13 PLACE/Ladywell (former Ladywell Leisure Centre).	No further action to be taken in relation to the new Local Plan.

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							Paragraph 14.82.2 should be more specific about proposals for the very wide footway in front of the temporary building, since at present it is used for unlawful parking. Retention of this very wide footway is only a beneficial public asset if it is planned, designed and managed appropriately. It should not be used for car parking.	For clarity, the new Local Plan Policy LCA SA 13 already states that the site is allocated for “Comprehensive mixed-use redevelopment comprising compatible main town centre, commercial, community and residential uses.” For that reason, the Council considers the site allocation sound. The Council also notes the comments raised in relation the unlawful parking on the as described “very wide footway”. The Council does not consider this a matter of soundness. The Council will work with partners to manage and enforce operational matters, such as unlawful parking, as part of its regulatory responsibilities and functions.	
CON123	REP551	TfL			3	LCA SA 18	<p>Paragraph 14.107.2: The requirement to not prejudice the delivery of the realignment of the A205 is supported, but this should be extended to include working with TfL to deliver elements of the improvements along the sites’ frontages, including through section 278 and section 106 obligations: ‘Development must not prejudice the delivery of transport infrastructure, including public realm enhancements associated with the re-alignment of the A205. <u>Applicants should work in partnership with TfL to deliver elements of the improvements along the sites’ frontages.</u> The siting of buildings must ensure the traffic and transport improvements along the South Circular at Sangley Road, Plassy Road and Brownhill Roads can be implemented in full.</p> <p>12 Brownhill Road has been included in the site allocation but is a small, privately owned housing site. It may be unnecessary to include this site within the allocation. Note that the 12 Brownhill Road site is rectangular and does not include the triangle-shaped area behind the hoarding on the TfL site adjacent at the corner of Brownhill and Plassy Roads.</p> <p>The development requirements in paragraph 14.107 should make specific mention of permeability through the wider site, including across the various land ownerships, rather than just connections to the surrounding street network. Paragraph 14.107.3 should be amended as follows: ‘The site must be re-integrated with the surrounding street network to improve access and permeability in the local area, and to better integrate the site with the Primary Shopping Area. This will require a hierarchy of routes with clearly articulated east–west and north–south corridors, as well as permeability</p>	<p>The Council notes and welcomes the support offered by TfL in relation to the new Local Plan Policy LCA SA 18 Catford Island – specifically in respect of securing the delivery of highway infrastructure improvements to the A205 South Circular Road.</p> <p>The detailed comments made in relation to the wording of the Development Requirements set out under Paragraph 14.107 2 are noted. The Council could consider the suggested amendment as a modification as part of the examination process.</p> <p>The detailed comments made in relation to the wording of the Development Requirements set out under Paragraph 14.107 3 are noted. The Council considers that the current text is already sound and that the suggested addition is unnecessary.</p> <p>The comment made in relation to the site boundary and the inclusion of 12 Brownhill Road is noted. The Council will explore this matter and amend the boundary should this be necessary. This can be progressed as a modification as part of the examination process.</p>	<p>Subject to it being demonstrably necessary it is suggested that the Council consider a modification to the new Local Plan Policy LCA SA 18 Paragraph 14.107 2 as follows –</p> <p><i>“2. Development must not prejudice the delivery of transport infrastructure, including public realm enhancements associated with the re-alignment of the A205. Developers should work in partnership with TfL to deliver improvements along the sites’ frontages. The siting of buildings must ensure the traffic and transport improvements along the South Circular at Sangley Road, Plassy Road and Brownhill Roads can be implemented in full.”</i></p> <p>The Council will further explore the necessity of including 12 Brownhill Road with the site allocation boundary. Subject to it being demonstrably necessary the site boundary will be amended through the modifications process.</p>

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							<u>between and through the various land ownerships that make up the site.'</u>		
CON123	REP552	TfL			3	LCA SA 19	<p>It may be helpful to note that Lawrence House is a temporary building at the end of paragraph 14.110: <u>'Lawrence House was designed as a temporary building to enable redevelopment following the A205 realignment.'</u></p> <p>The replacement and improvement of bus facilities lost due to the realignment outside Lawrence House, the Civic Centre and Broadway Theatre should be included as a development requirement in paragraph 14.111.4: 'Applicants must work in partnership with Transport for London to deliver the realignment of the A205 South Circular, ensuring it is integral to the development of the site. <u>There must be provision for buses and replacement and improvement of bus facilities lost due to the realignment.'</u></p> <p>The development guidelines in paragraph 14.112.6 should be amended to refer to links to the stations: 'Development should improve opportunities for walking, cycling and other active travel modes along A205 Catford Road, <u>including to Catford and Catford Bridge stations</u>, contributing to the A21 Healthy Streets Corridor.'</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 19 and its supporting text.</p> <p>Paragraph 14.110 Laurence House The Council acknowledges that the intended status of Laurence House may be of interest to some readers of the new Local Plan. However, the proposed addition is unnecessary to make the new Local Plan sound.</p> <p>Paragraph 14.111 Replacement Bus Facilities The Council is committed to securing sustainable travel infrastructure network improvements in support of the new development planned-for through the new Local Plan. This is support throughout the new Local Plan – critically at Policy OL 1 the Spatial Strategy; Policy TR 1 Sustainable Transport and Movement; and across the site allocations. The proposed amendment seeks a strong site-specific requirement that the Council considers overly prescriptive. The new Local Plan's general policies provide an effective and justified mechanism for such matters to be fully considered and addressed in detail as part of the development management process. Furthermore, the respondent is not only a key partner in the redevelopment of Laurence House and the Civic Centre but is also anticipated to lead on the proposed A205 and sustainable transport improvements. For those reasons the proposed amendments are considered unnecessary to make the new Local Plan sound.</p> <p>Paragraph 14.112 Development Guidelines The Council acknowledges the importance of delivering improved access to walking, cycling and other active travel modes along the A205 Catford Road. This is already</p>	No further action to be taken in relation to the new Local Plan.

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								clearly set out in the supporting text. The proposed additional text refers to destinations that are already located upon and accessed from the A205 (and its cycle and footways). Any improvements will have consequential benefits to these two destinations. For that reason, the Council does not believe that the changes are necessary to make the new Local Plan sound.	
CON123	REP553	TfL			3	LCA SA 20	We support the inclusion of this site allocation for the re-routing of the A205 South Circular, which will support the regeneration of the town centre and improvements to walking, cycling and public transport.	The Council notes and welcomes the support for the new Local Plan Policy LCA SA 20; specifically in relation to the improvements to the A205 South Circular Road.	No further action to be taken in relation to the new Local Plan.
CON123	REP554	TfL			3	LCA SA 21	<p>This is a large site and that its development should be comprehensive (14.117), and in accordance with the Catford Town Centre Framework (13.119.1), is supported.</p> <p>The references to connections to Waterlink Way, routes to Catford and Catford Bridge stations, rationalisation of vehicle entrances to the site and connections through the railway arches in the development requirements (14.119) and development guidelines (14.120) are supported.</p> <p>The connections to the stations and through the railway arches should consider pedestrian crossings on the A205 and A212 roads. Paragraph 14.120.8 should therefore be amended as follows: ‘Proposals should investigate and maximise opportunities to facilitate links through the railway arches and across the A212 as well as links across the A205.’</p>	<p>The Council notes and welcomes the broadly supportive comments made in relation to the new Local Plan Policy LCA LA 21 Wickes and Halfords, Catford Road.</p> <p>For clarity, the new Local Plan Policy LCA SA 21 already states that the site is allocated for “Comprehensive residential led mixed-use redevelopment with compatible main town centre and commercial uses.”</p> <p>The Council notes the suggested amendment to supporting text Paragraph 14.120 and acknowledges that the additions could provide useful additional information. However, the Council also notes that matters of connectivity are already addressed under supporting text Paragraph 14.119.</p>	<p>Consider the necessity of the proposed addition to supporting text Paragraph 14.120 8 –</p> <p><i>“Proposals should investigate and maximise opportunities to facilitate links through the railway arches and across the A212 as well as links across the A205.”</i></p>
CON123	REP555	TfL			3	LCA	<p>Not allocated: Big Yellow Storage, 155 Lewisham Way, London SE14 6QP and Wearside Depot, Wearside Road, London SE13 7EZ:</p> <p>These sites are not identified as site allocations but are critical for the delivery of the BLE. The formal safeguarding directions will give a degree of protection to the sites and future development. However, identifying future uses of the sites through a site allocation in the local plan, including for BLE infrastructure would best protect the interests of the BLE, and new London Underground services to Lewisham.</p>	<p>The Council notes the comments made by the respondent and the suggestion that the site be allocated through the new Local Plan.</p> <p>The Council understands the respondent’s position in suggesting such an approach. Nevertheless, the new Local Plan Policy TR2 Bakerloo line extension does provide an appropriate strategy for considering potential proposals that could come forward on such sites.</p>	The Council will work with Transport for London to identify an approach that can be deployed through the new Local Plan to identify the sites that may be required to deliver the proposed Bakerloo Lone Extension. The solution will be identified and agreed through negotiation post-submission. Once agreed the modification will form part of a future up-dated SoCG between the two partners and be pursued

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									through a modification to the new Local Plan.
CON123	REP556	TfL			3	LNA	<p>While objective 9 refers to the expansion of cycle hire throughout the North Area, additional specific locations where it could be added should be referenced in objectives 10 and 11, as below.</p> <p>10: To this objective should be added: <u>'Expand the cycle hire scheme along the River Thames and Deptford Creekside.'</u></p> <p>11: To this objective should be inserted: 'Protect and enhance open and green spaces, including waterways. Continue to deliver and expand the North Lewisham Links, a connected network of high-quality walking routes and cycleways that link these spaces, <u>including supporting the potential for any cycle hire expansion along these routes.</u> Ensure these routes address existing barriers to movement, such as those caused by the tangle of railways and major roads.'</p>	<p>The Council notes the broadly supportive comments made by the respondent in relation to the new Local Plan Chapter 15 Lewisham's North Area Objectives 10 and 11.</p> <p>The Council considers that the Objectives, which are supporting text to the subsequent Lewisham North Area Policies and Site Allocations are already sound and do not require additional amendment.</p> <p>The suggested amendments are overly prescriptive and are not supported by any evidence to demonstrate that they are deliverable and developable. The existing text at Objective 9 is sufficiently flexible to allow for the consideration of proposal to expand cycle-hire, at the suggested locations, should the opportunity arise.</p>	No further action to be taken in relation to the new Local Plan.
CON123	REP557	TfL			3	LNA 02	<p>The following text should be added to Part C: <u>'Cycle hire provision should be expanded along New Cross Road.'</u></p>	<p>Th Council notes the comments made in relation to the new Local Plan Policy LNA 02 New Cross Road / A2 corridor.</p> <p>The Council considers the new Local Plan Policy LNA 02 to be sound. The suggested additional text is not justified and is overly prescriptive. However, the Council could consider an alternative amendment that captures the intent of the comment without being overly prescriptive.</p>	<p>The Council could consider a minor addition to the text of the new Local Plan Policy LNA 02 Part C, as an alternative to the suggested wording.</p> <p><i>This principal east-west route should be supported by a complementary network of legible, safe and accessible walking routes and cycleways, and their supporting infrastructure, that link with it to enhance connections between neighbourhoods and places. This includes connections to Deptford and New Cross District Centres, New Cross and New Gate stations, Goldsmith's College and open spaces in the surrounding area, such as Bridgehouse Meadows, Fordham Park and Folkestone Gardens.</i></p>
CON123	REP558	TfL			3	LNA SA 09	<p>Note that under paragraphs 15.65.6 and 15.65.9 new walking and cycling routes would be supported by TfL but they should be designed to be compatible and integrated with the stations.</p>	<p>The Council notes and welcomes the broadly supportive comments made in relation to the new Local Plan Policy LNA</p>	No further action to be taken in relation to the new Local Plan.

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							<p>We request a commitment to the delivery of a bus interchange including stands, stops, circulation system and driver facilities. This should be adjacent to the proposed Surrey Canal station. Before the station is operational, a temporary bus stand with driver facilities is required on Landmann Way to serve phase 1 of the Renewal development and other nearby schemes in Lewisham, such as Apollo. The development requirements in paragraph 15.64.8 should therefore be amended as follows: 'Provision for the new transport infrastructure within the site, including a new Overground station at Surrey Canal Road and an accompanying walking and cycle bridge and bus interchange, as well as temporary bus stand before the station is operational, in partnership with TFL and infrastructure providers.' This would ensure the development has links to central and inner London including Convoys Wharf, Deptford, New Cross and the Lewisham town centre.</p>	<p>SA 09 Surrey Canal Triangle Mixed-use Employment Location.</p> <p>The Council remains committed to working with infrastructure partners to secure the delivery of and investment in the infrastructure networks required to support the new growth planned-for through the new Local Plan.</p> <p>The Council considers the respondent, Transport for London, to be a key infrastructure delivery partner. As such, they continue to have a key role to play throughout the decision-taking processes that will be undertaken as part of the delivery of the new Local Plan.</p> <p>The new Local Plan already includes site allocation requirements and general planning policies that provide infrastructure partners with opportunities to influence and inform decision-taking. For that reason, the Council consider the new Local Plan to be sound.</p>	
CON123	REP559	TfL			3	LNA SA 11	<p>This allocation provides strong protection for use of the site as a new BLE station.</p> <p>Lewisham should consider using the local plan for safeguarding lands surrounding the site, including that of the existing railway station (New Cross Gate).</p> <p>The time period for delivery starts in 6–10 years. We question this timescale, given the site is protected for BLE construction, the period for which is likely to extend beyond this.</p> <p>This site allocation should require car-free development.</p>	<p>The Council notes and welcomes the support offered in relation to the new Local Plan Policy LNA SA 11 Former Hatcham Works, New Cross Road. The Council notes the respondent's specific comments to the use of the site as a new Bakerloo Line Extension station.</p> <p>The Council acknowledges the respondent's comment about considering a wider site allocation. The site identified under new Local Plan Policy LNA SA 11 is justified – specifically in relation to its deliverability and developability. The Council considers that the new Local Plan includes appropriate mechanisms to consider more expansive opportunities for development should these arise during the plan period.</p> <p>The Council notes the respondent's comments about the possible phasing of the site. It is noted that it may be</p>	No further action to be taken in relation to the new Local Plan.

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								<p>desirable for the site to come forward later – to facilitate the delivery of the proposed Bakerloo Line Extension. However, whilst the Council maintains its strong support for the Bakerloo Line Extension, it is on balance concluded that it would be challenging to cite prematurity as a reason for refusing and delaying development. Nevertheless, the new Local Plan includes appropriate mechanisms to ensure that the delivery of the proposed Bakerloo Line Extension is not harmed by development coming forward during the Plan's short-medium term.</p> <p>The new Local Plan does not seek to identify specific places or sites for car free development. The Council considers that such an approach would be inappropriate. Nevertheless, the new Local Plan follows the London Plan's approach and encourages such opportunities where they arise in places where they are deliverable, developable and viable.</p>	
CON123	REP560	TfL			3	LEA SA 03	<p>'Planning status' should be updated to include planning application DC/22/126997, which is currently under consideration.</p> <p>There should be an additional development requirement: <u>'5. Retention of existing mature trees.'</u> This would ensure the retention of the mature trees on the Eltham Road frontage of the site, which are a positive feature of the area.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LEA SA 03 Leigate Shopping Centre.</p> <p>The Council notes the suggestion that the new Local Plan be amended to refer to the most recent planning history. This could be considered through the examination modifications process.</p> <p>The Council also notes the suggestion that an additional requirement be introduced, which seeks the retention of the mature trees that front onto the Eltham Road. Whilst this may provide additional information, it is not necessary to ensure the soundness of the new Local Plan. The new Local Plan Policy GR 5 Urban Greening and Trees already places a requirement to retain existing trees on site.</p>	Consider introducing a modification during the examination process that updates the new Local Plan Policy SEA SA 03 to include a reference to planning application DC/22/126997.
CON123	REP561	TfL			3	LSA 01	Part C: The phasing of development where the BLE will materially impact on travel behaviour is supported. Lewisham should support this by setting out how its evidence base will	The Council notes the specific support offered by the respondent in relation to the phasing of new development relative	No further action to be taken in relation to the new Local Plan.

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							highlight where shortcomings exist or may become apparent as development comes forward.	<p>to the implementation of the proposed Bakerloo Line Extension.</p> <p>The Council notes and understands the respondent's position in relation to this matter. The Council will continue to work with all its infrastructure partners to ensure new development is supported by appropriate investment in infrastructure in a timely fashion.</p> <p>The Council remains committed to working with infrastructure partners to secure the delivery of and investment in the infrastructure networks required to support the new growth planned-for through the new Local Plan. The Council continues to strongly support the investment and implementation in the Bakerloo Line Extension. It is an important infrastructure improvement that will bring significant benefits to the Borough, South East London, and the wider Capital as a whole.</p> <p>However, upon consideration the Council concludes that this specific matter is not an issue of soundness.</p> <p>Nevertheless, the Council could consider providing Transport for London with a possible solution outside of the plan-making process. This will require the Council to work with development industry partners to identify delivery trajectories for all relevant sites. This is an action that could be undertaken during the submission and examination process. The Council consider that this action is unnecessary to secure soundness, compliance or general conformity.</p>	The Council to work with development industry partners to identify a realistic delivery trajectory that can inform the wider Bakerloo Line Extension process.
CON123	REP562	TfL			3	LSA 03	Part A states 'The designation of an Opportunity Area at Bell Green and Lower Sydenham in a future review of the London Plan will be strongly supported by the Council.' Subject to any future decision to extension the Bakerloo line beyond Lewisham to Hayes and Beckenham Junction, such a designation would be supported in principle as it would enable the extension to better support the delivery of new homes and	<p>The Council notes and welcomes the comments made by the respondent in relation to a future iteration of the London Plan potentially identifying Bell Green and Lower Sydenham as an Opportunity Area. The Council also welcomes the broadly supportive comments made in respect of</p>	<p>Consider an alternative amended wording to supporting text Paragraph 17.11 –</p> <p><i>"The Bell Green and Lower Sydenham area is being actively promoted by the Council to</i></p>

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							<p>jobs that would otherwise be constrained by limited public transport capacity. Any build out of the potential future Opportunity Area would need to ensure that it could accommodate the provision of the future BLE, including all necessary supporting infrastructure.</p> <p>It is recommended that the first sentence of paragraph 17.11 is amended, as designation would require further consideration by the Greater London Authority and TfL, and the extent of this consideration does not currently amount to the area being 'poised' to become an Opportunity Area: 'The Bell Green and Lower Sydenham area is poised to become one of London's next Opportunity Areas, and the Council will support this the designation of the Bell Green and Lower Sydenham area as an Opportunity Area in a future review of the London Plan.'</p> <p>Part C implies that land is 'safeguarded' for the BLE to Hayes. A distinction should be made between the 'safeguarding' as a matter of planning policy, and the formal safeguarding directions made by Secretary of State for Transport on 1 March 2021 in respect of the BLE, which, as per our comments on policies TR1 (Sustainable transport and movement) and TR2 (Bakerloo line extension), must be complied with under the Town and Country Planning (Development Management Procedure) (England) Order 2015 and relate to phase 1 of the BLE.</p> <p>The site allocation is unclear as to what will be safeguarded beyond a station. Although not yet confirmed, the BLE would likely require a stabling site in the vicinity of either of these two sites if Phase 2 were to come forward. TfL would welcome specific wording about a stabling/maintenance facility being included within the site allocations for these areas. Alternatively, we would welcome the ability to include this in the next review phase of the local plan.</p> <p>The principles set out in the policy by way of protecting future BLE infrastructure requirements are welcomed.</p>	<p>how the new Local Plan Policy LSA 03 addresses the proposed Bakerloo Line Extension.</p> <p>The Council notes the respondent's comments on the plan-making process associated with the designation of future Opportunity Areas – such as the one anticipated for Bell Green. Whilst the Council understands the technical processes for designation, it is nevertheless disappointed by these negative comments. The residents and communities of Bell Green and Lower Sydenham are eagerly expecting positive change through the new Local Plan. The suggested amendment is potentially incendiary and could have negative impact for the respondent and the Greater London Authority. Nevertheless, the Council will consider a more positively worded but factually accurate alternative.</p> <p>The Council notes the comments raised in relation to the different definitions of the terms "safeguarding" and how these may apply in respect of the Bakerloo Line Extension. The Council acknowledges that such technical differences may exist but concludes that this is not a fundamental matter of soundness for the new Local Plan. The respondent, Transport for London, is and will continue to be involved in the decision-taking process and has frequent opportunities to define the technical distinctions when it is necessary. The Council welcomes and values their contribution.</p> <p>The Council note that Transport for London's position is that they are considering extending the Bakerloo line to improve transport connections in southeast London. The Council is a confirmed partner in this process and is supportive. The new Local Plan takes this longer-term investment into account – in</p>	<p><i>become one of London's next Opportunity Areas. The Council will support the designation of the Bell Green and Lower Sydenham Area and make robust representations to achieve this as part of the next review of the London Plan."</i></p>

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								<p>respect of the spatial strategy, site allocations and planning policies.</p> <p>However, the design detail of the proposed scheme remains in preparation – the Council note that the extent of scheme south of Lewisham Town Centre is still subject to detailed consideration. Consequently, in the absence of that necessary detail the suggested additions to the new Local Plan Policy LSA 03 are not currently considered unjustified. For this level of detail to be included in the new Local Plan, Transport for London would need to provide more evidence – not only of the extent of provision being sought but also of its deliverability and developability.</p> <p>Nevertheless, the Council remains committed to working positively with Transport for London to secure the Bakerloo Line Extension improvements within and beyond the Plan period.</p>	
CON123	REP563	TfL			3	LSA 04	Part D should refer to improving walking, cycling and bus connectivity to National Rail and DLR stations, to deliver broader connectivity.	<p>The Council notes the suggested additions to the new Local Plan Policy LSA 04 D – namely, that specific reference be made to improving connectivity to National Rail and Dockland Light Rail Stations.</p> <p>For clarity, the existing wording of the new Local Plan Policy LSA 04 D seeks to improve connectivity between neighbourhoods and places (inclusive of open spaces). The policy wording does not seek to provide a list or schedule of places – to do so would be impractical. The new Local Plan clearly sets out opportunities for improving connections under Figures 17.2 and 17.3.</p> <p>The new Local Plan seeks to address the improvement of walking, cycling and bus connectivity across its entirety. This is focussed through the content under Chapter 12 Transport and Connectivity.</p>	No further action to be taken in relation to the new Local Plan.
CON123	REP564	TfL			3	LWA SA 02	We welcome paragraph 18.22.2 which includes consultation with TfL on railway station developments.	The Council welcomes the support offered to the new Local Plan Policy LWA SA 02.	No further action to be taken in relation to the new Local Plan.
CON123	REP565	TfL			3	LWA SA 05	Public realm improvements and consideration of development of the car park would be strongly supported.	The Council welcomes the support offered to the new Local Plan Policy LWA SA 05.	No further action to be taken in relation to the new Local Plan.

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CON123	REP566	TfL			3	LWA SA 06	Development of the car park would be strongly supported.	The Council welcomes the support offered to the new Local Plan Policy LWA SA 06.	No further action to be taken in relation to the new Local Plan.
CON123	REP567	TfL			3	LWA SA 11	Paragraph 18.60.1 should refer to Policy TR4 (Parking), to clarify that parking should not exceed the maximums in that policy: <u>‘Development should make a more optimal use of land by considering options for the car park, including rationalising the existing level of provision, taking into account needs of visitors and businesses along with public transport accessibility levels, and in accordance with the maximums set out in Policy TR4 (Parking).’</u>	The Council notes the comments and suggested amendment to the new Local Plan Policy LWA SA 11. The Council does not consider this to be a matter of soundness. The new Local Plan must be read and considered within its entirety and for that reason it is inappropriate to repeat policy. Future proposals for new development on this site allocation will be considered under the new Local Plan Policy TR 04.	No further action to be taken in relation to the new Local Plan.
CON123	REP568	TfL			4	DM 02	<p>Part E lists a number of issues that may be addressed through planning obligations, but there is currently no indication of the priority should financial viability issues arise. While paragraph 19.12 notes the priority given to affordable housing and transport infrastructure obligations in the London Plan, Part E should be amended to make it clear that affordable housing and transport infrastructure share joint highest priority, as set out in policy DF1D (Delivery of the plan and planning obligations) of the London Plan.</p> <p>Government guidance indicates that policy requirements for planning obligations should be clearly set out so that they can be accounted for by developers. While DM2 refers to planning obligations in connection with ‘public transport improvements’, TfL consider it should explicitly refer to the BLE and the potential for it to be funded in part from the Community Infrastructure Levy (CIL) and planning obligations. It remains our view that it would be advantageous for Lewisham to commit to identifying how planning obligations can support the funding of the BLE, as there will be an expectation that significant developer contributions would be needed alongside, for example, other borough funding. Similarly, a dedicated proportion of CIL or other levy could alleviate uncertainty for developers and would reflect the relationship between the BLE and its integral role in unlocking developments in Lewisham.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy DM 2 Infrastructure funding and planning obligations.</p> <p>The Council remains committed to working with infrastructure partners to secure the delivery of and investment in the infrastructure networks required to support the new growth planned-for through the new Local Plan. The Council continues to strongly support the investment and implementation in the Bakerloo Line Extension. It is an important infrastructure improvement that will bring significant benefits to the Borough, South East London, and the wider Capital as a whole.</p> <p>However, upon consideration the Council concludes that this is not a matter of soundness.</p> <p>Nevertheless, the Council remains committed to supporting the delivery of the Bakerloo Line Extension. It is an important investment in strategic sustainable travel infrastructure that may continue to be implemented over the life of the plan and beyond.</p> <p>However, purely within the context of this representation the Council considers that the absence of confirmation of a specific funding mechanism (such as the Mayor’s</p>	No further action to be taken in relation to the new Local Plan.

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								<p>CIL) to channel developer contributions in support of the Bakerloo Line Extension the respondent's suggested approach is currently unsound.</p> <p>Transport for London are a valued partner and are encouraged to continue working with the Council, as the charging and collecting authority, to negotiate and agree an appropriate and proportionate contribution from CIL. The respondent is reminded that CIL is only a source of top-up funding, which can be used to lever other possible investment funds.</p>	
CON123	REP569	TfL			4	DM 07	Ref. LPI14: The text should say 'London Plan' rather than 'draft London Plan'.	The Council welcomes the identification of this error. The text will be amended as a minor modification.	Amend the new Local Plan Policy DM 07 Table 19.1 LPI 14 Small Housing Sites to reflect the factual position through a minor modification.
CON123	REP570	TfL				IDP	The number of new DLR trains should be corrected as follows: 'In 2017 TfL began the process of replacing the existing DLR trains with 57 54 new ones.' The new trains will begin to rollout in 2024, though the specific date for the uplift to 30 trains per hour is not yet confirmed.	The Council welcomes the comments made in relation to the Lewisham Infrastructure Delivery Plan. Although this is not considered to be a matter of soundness for the new Local Plan the Council will seek to amend the content of the Infrastructure Delivery Plan accordingly.	Amend the Infrastructure Delivery Plan to reflect the factual position on the number of replacement DLR trains being provided.
CON123	REP571	TfL				IDP	It is our understanding that all trains that pass through Lewisham station stop at that station. If this paragraph is instead referring to trains that bypass Lewisham on separate lines, this should be clarified. The 'New Cross to Lewisham Overground extension' is not currently being progressed by TfL, with the BLE being our preferred scheme in this location.	The Council welcomes the comments made in relation to the Lewisham Infrastructure Delivery Plan. Although this is not considered to be a matter of soundness for the new Local Plan the Council will seek to amend the content of the Infrastructure Delivery Plan accordingly.	<p>Confirm the factual position on this matter and amend the Infrastructure Delivery Plan accordingly.</p> <p>Amend the Infrastructure Delivery Plan to remove reference to the former proposals for the New Cross to Lewisham Overground Extension.</p>
CON123	REP572	TfL				IDP	his should be updated as follows: 'From October 2021 the The ULEZ will be expanded to includes all areas of the borough to the north of the South Circular. In the longer term the Council will assess the feasibility of seeking to further expand the ULEZ to cover the entire borough.'	The Council welcomes the comments made in relation to the Lewisham Infrastructure Delivery Plan. Although this is not considered to be a matter of soundness for the new Local Plan the Council will seek to amend the content of the Infrastructure Delivery Plan accordingly.	Amend the wording of the Infrastructure Delivery Plan to reflect the factual position of the ULEZ expansion.
CON123	REP573	TfL				IDP	The 'indicative timescale for project delivery' for the 'Bakerloo line extension and upgrade' should be shown as 2035–2045 rather than 2020–2035. The 'New Cross to Lewisham	The Council welcomes the comments made in relation to the Lewisham Infrastructure Delivery Plan. Although this	Amend the wording of the Infrastructure Delivery Plan to reflect Transport for London's

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							Overground extension’ is not currently being progressed by TfL, with the BLE being our preferred scheme in this location.	is not considered to be a matter of soundness for the new Local Plan the Council will seek to amend the content of the Infrastructure Delivery Plan accordingly.	anticipated timetable for the implementation of the Bakerloo Line Extension. Amend the Infrastructure Delivery Plan to remove reference to the former proposals for the New Cross to Lewisham Overground Extension.
CON124	REP574	GLA			0	OL 01	<p>Thank you for consulting the Mayor of London on the proposed Lewisham Local Plan - Regulation 19 Consultation. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and which are attached at Annex 1. The Mayor provided comments on the earlier London Borough of Lewisham (LBL) Local Plan Regulation 18 ‘Main Issues and Preferred Approaches’ consultation on 19 March 2021 (Ref: LDF23/LDD09/ LP01/JP01). This letter follows on from that earlier advice and sets out where you should make further amendments so that the draft Plan is consistent with the London Plan 2021 (LP2021). These comments should be read alongside the Mayor’s previous response. The LP2021 was formally published on the 2 March 2021, and now forms part of LBL’s Development Plan and contains the most up-to-date policies.</p> <p>General The draft Local Plan is centred on 22 strategic objectives which in turn are based on nine strategic themes, including housing tailored to the community with genuinely affordable homes, a greener borough, responding to the climate emergency and healthy and safe communities. Each of the objectives and overarching themes are well aligned with the Mayor’s Good Growth objectives including GG1 building strong and inclusive communities, GG3 creating a healthy city and GG6 increasing efficiency and resilience.</p> <p>The strategic approach is to focus growth at the borough’s Growth Nodes, Regeneration Nodes and the borough’s two Opportunity Areas of New Cross/Lewisham/Catford and Deptford Creek/Greenwich Riverside. This is set out clearly in Policy OL1 which also identifies more specific areas for different types of development such as residential and commercial development and this is welcomed. We note at</p>	<p>The Council notes and welcomes the broad support that appears to be provided to the new Local Plan Policy OL 01 Spatial Strategy.</p> <p>The Council notes that it is unclear to the GLA what the Borough’s growth needs are over the life of the new Local Plan. The Council maintains that the new Local Plan be read and considered in its entirety. In this respect the new Local Plan does clearly set out the Borough’s growth needs, and how they will be delivered. The Council notes that the Borough’s future growth needs are addressed under Policies OL1, HO1 and EC2. The Council notes that the London Plan itself takes a similar approach – namely, that its spatial strategy does not set out the Capital’s growth needs.</p> <p>Finally, the Council notes that the respondent highlights the need to utilise “up-to-date” evidence – specifically their own strategic employment land evidence published during Q1 2023. The Council notes that data, relating to all forms of growth, is dynamic and it is established fact that emerging Local Plans cannot take account of all data sources – they should be proportionately prepared with available and accessible datasets. In this respect the Council maintains that the new Local Plan has been prepared in accordance with this objective and is sound. The Council considers it is unhelpful that new (untested) data be introduced at such a late stage in the process, with the specific objective of substantially informing the content of the new Local Plan.</p>	<p>It is suggested that the Council could, In the interest of resolving the GLA’s stated concern, consider a modification to Policy OL1 that sets out the quantum of planned-for growth – new housing, employment, retail and other floorspace. This could be proposed as a major modification. Introduction of this modification would be subject to reaching agreement with the GLA through a SoCG.</p> <p>The Council could consider a new sub section at the end of Chapter 3 – from new Paragraph 3.28 onwards. This addition could include a new table that clearly sets out the quantum of growth proposed through the new Local Plan for the individual Opportunity Areas, Regeneration Nodes, Growth Nodes, Town Centres, District and Local Centres etc.</p> <p>To provide a clear data driven narrative to the spatial strategy, site allocations, and planning policies relating to employment need, the Council will prepare a topic/ supplementary evidence paper. This will specifically explore industrial employment need, gains, and losses. The topic paper will be submitted to the examination in support of the new Local Plan. Where appropriate it will inform the Council’s consideration of</p>

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							<p>Policy LSA3 the proposed intention for a future Opportunity Area at Bell Green and Lower Sydenham as it would benefit from a potential future extension of the Bakerloo Line beyond Lewisham.</p> <p>The spatial approach is to divide the borough into five respective character areas: South, Central, Western, Eastern and Northern. Table 13.1 in relation to the proposed site allocations then breaks down indicative growth capacities covering a 20-year period for each of the character areas in relation to new homes, employment floorspace and town centre uses. It sets out the intention to deliver between 24,413 and 26,887 new homes and 237,228sqm of employment floorspace over the course of the Plan. This approach is clear, direct and very comprehensive. This clarity is welcome, but the employment figures would further benefit by being divided into their indicative component growth figures for Class E and Class B uses. Given the breadth of Class E uses, consideration could be given to where these might be appropriately located e.g. town centres, designated industrial land.</p> <p>While this potential growth is welcomed, it is less clear what the borough's growth needs are over the life of the Plan. Only then can we understand how the strategic approach is able to contribute towards meeting those needs. The Plan period starts in 2020 and runs until 2040.</p> <p>As currently written, it is the Mayor's opinion that the draft Plan is not in general conformity with the LP2021 for two reasons related to the proposed management of the borough's industrial land. Firstly, the proposed downgrading of three parcels of industrial land from Strategic Industrial Locations (SILs) to Locally Significant Industrial Sites (LSIS) has not been supported by evidence robust enough to demonstrate that the proposed designation of new SIL at the Bermondsey Dive Under site is suitable replacement to realistically support functional SIL. Secondly, LBL have not sufficiently established what the borough's industrial need is over the life of the Plan. This should be based on up-to-date information and should form the basis of the borough's intended approach to the management of its industrial land.</p> <p>These issues are discussed in greater detail below. GLA officers have previously worked with LBL officers to resolve matters in relation to tall buildings and are happy to offer their continued support and guidance in resolving these outstanding issues ahead of LBL submitting the draft Plan for examination.</p>	<p>Nevertheless, the Council is prepared, in the interests of maintaining a positive partnership, to undertake a data reconciliation exercise that will seek to validate the data narrative of the new Local Plan. This exercise will specifically focus upon employment need, gains, and losses. The outputs of this exercise will form a supplementary topic paper that will be submitted alongside the new Local Plan.</p>	<p>possible modifications. Any modifications will be discussed with the GLA and agreed through the examination process. It is intended that agreed modifications will be referenced in the Statement of Common Ground between the two parties.</p>
CON124	REP575	GLA			2	HO 01	Housing Lewisham's housing target is set out in Table 4.1 of the LP2021 and this is reflected in Policy HO1 to deliver and	The Council notes and welcomes the supporting comments made in relation to	No further actions required in relation to the new Local Plan.

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							<p>exceed the delivery of 16,670 new homes between 2019 and 2029 and this is welcomed. We note LBL's intention to roll forward the borough housing target beyond 2029 (1,667 new homes a year) but LBL should take into consideration paragraph 4.1.11 of the LP2021 which states that if a target is required beyond 2029 boroughs should draw on the 2017 SHLAA findings, any local evidence of identified capacity, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the borough's small sites housing target.</p> <p>Boroughs should take into consideration under-delivery of housing for the period 2019 until the start of the Local Plan period, and LBL have recognised this by adding an additional requirement to deliver 461 new homes for the first five years of the Plan. This too is welcomed.</p> <p>Policy HO1 should reflect the borough's small sites target which is set out in Table 4.2 of the LP2021 for the delivery of 379 new homes a year from sites below 0.25ha in size. Small sites can be a valuable source of future housing supply in London and LBL is encouraged to promote this form of development by following the guidance set out in Policy H2 of the LP2021. Policy HO2 of the draft Plan seeks to optimise the delivery of housing from small sites and the small sites target is reflected in paragraph 7.14 of the draft Plan. While this is welcomed it is considered that it should, nevertheless, be included within a policy, as it is a strategic target. LBL's intention to exceed its small sites target as set out in paragraph 7.15 is supported by the Mayor and is consistent with paragraph 4.2.5 of the LP2021 which makes it clear that the small sites target should be treated as a minimum.</p> <p>The draft Plan is generally positive about housing from small sites and it is noted that seven have been identified as potential site allocations. The Mayor encourages boroughs to take a proactive approach towards housing delivery from small sites. Policy H2B of the LP2021 makes it clear how boroughs should go about this by preparing site-specific briefs, masterplans and housing design codes for small sites and by identifying and allocating appropriate small sites for residential development among several other suggestions. The Mayor has published the draft Small Sites Design Code London Plan Guidance1 document which provides further detail and LBL are advised to follow it.</p>	<p>new Local Plan Policy HO 01 in respect of the approaches towards under-delivery and the strategic target for new affordable housing.</p> <p>Housing Target The Council notes the comments and potential implications alluded to by the respondent in relation to the new Local Plan's housing target. The Council concludes that these are unhelpful. The Council maintains that the approach taken by the new Local Plan is sound, and critically is in accordance with national policy in seeking to significantly boost housing delivery. The approach taken by the Council seeks to maintain the positive upwards trajectory for delivering new homes across Lewisham. It is a continuation of the existing strategy. Deviating from the London Plan target (beyond 2029) exposes the new Local Plan to unnecessary scrutiny and risk. Not least is the possibility that a theoretical lower OAHN figure runs counter to the London Plan, which may have a higher target.</p> <p>More pertinently, NPPF Para 33 provides sufficient flexibility for this matter to be addressed without recourse to the suggested approach.</p> <p>"Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future."</p> <p>Furthermore, it is worth noting that the proposed new planning system will introduce transition arrangements (for local plans) that effectively give the new Local Plan a finite lifespan until 2029/30. Coupled with NPPF Para 33 this addresses this representation.</p>	

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								<p>Small sites</p> <p>The Council agrees that small sites can be a useful source of additional housing supply. The Council considers that the approach set out in the new Local Plan is sound.</p> <p>The approach to small sites is set out under new Local Plan Policy HE 02, which includes reference to the London Plan's target under Paragraph 7.14. As the London Plan forms part of Lewisham's Development Plan it is unnecessary to regurgitate its content within policy text. Critically, the new Local Plan does clearly state that performance will be monitored against the London Plan's target. Consequently, no changes are necessary to ensure soundness.</p>	
CON124	REP576	GLA			2	HO 03	<p>Policy HO3 makes clear the intention to follow the Mayor's threshold approach to affordable housing. Part A of the policy sets out clearly that residential development proposals achieving a minimum 35% affordable housing will follow the Fast Track Route (FTR). Part F of the Policy reflects other threshold levels set out in Policy H5 of the LP2021 which are for 50% affordable housing on publicly owned land and on designated industrial land where development would result in the loss of industrial capacity. However, to be completely consistent with Policy H5 of the LP2021, it should set out that where residential development on non-designated industrial sites would result in the loss of industrial capacity the threshold should be set at 50% too. This criterion should also be included in Policy HO3 for clarity and consistency with the LP2021.</p> <p>Policy HO3, or supporting text, should also make it clear that the 50% threshold for affordable housing only applies to publicly owned land where there is no portfolio agreement with the Mayor. This is set out in Policy H5 of the LP2021 and is clarified at paragraph 4.5.6 which states that where there is such an agreement to deliver at least 50% affordable housing across the portfolio of sites, then the 35% threshold should apply to individual sites. This clarification would be welcomed.</p> <p>The requirement in Part D of Policy HO3 that applications should make reasonable efforts to secure grant funding to increase affordable housing is noted and is consistent with LP2021 Policy H5C4.</p>	<p>The Council notes and welcomes the supporting comments made in relation to new Local Plan Policy HO 03 in respect of housing tenure split and the approach towards securing grant funding.</p> <p>London Plan Threshold Approach to Affordable Housing</p> <p>The Council assumes that the respondent is questioning the soundness of the new Local Plan Policy HO 03 on the basis that it does not repeat the London Plan Policy H5 in its entirety. However, the Council considers that the new Local Plan Policy HO3 does make clear cross-reference to the relevant parent policy contained within the London Plan. Consequently, it is clear to the reader the inter-relationship between the two policies and consequently it is unnecessary to repeat verbatim the content of the parent policy.</p> <p>Furthermore, the Council notes that National Planning Policy sets out that new plans be positively prepared "in a way that is aspirational but deliverable" (NPPF Para 16). National policy continues by stating that plan-making "should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate,</p>	No further actions required in relation to the new Local Plan.

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							As drafted, Policy HO3 part E (a) uses the term 'subject to viability' in relation to affordable housing. LBL should avoid using this term and instead substitute it with 'subject to the threshold approach'. Seeking the 'maximum amount of affordable housing subject to viability' is no longer the supported method of seeking affordable housing from residential development. Paragraph 4.4.2 of the LP2021 explains that the threshold approach provides an opportunity to move away from viability debates, creates greater certainty in terms of affordable housing requirements, embeds affordable housing requirements into land values and offers a clear incentive for developers to achieve the threshold levels. LBL should note this and amend part E of the policy accordingly.	<p>focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals" (NPPF Para 31). In respect of developer contributions, the NPPF states that "This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan" (NPPF Para 34).</p> <p>National planning policy is further expanded upon by NPPG that sets the need to support plan-making through the preparation of viability assessments, which demonstrate the deliverability of planned-for growth – "prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable" (NPPG Paragraph: 039 Reference ID: 61-039-20190315).</p> <p>However, it is understood and established that local plans only ever provide a "snapshot" in time and that the currency of their evidence will over time diminish. Within this context, new Local Plan Policy HO3 (criteria F, G and H) are entirely consistent with national policy and guidance – in that they provide development partners with an opportunity to present evidence that economic conditions have changed. Consequently, the Council considers that the new Local Plan is sound.</p>	
CON124	REP577	GLA			2	HO 04	<p>Affordable housing In Policy H4 of the LP2021 the Mayor has set a strategic target that 50% of all new homes in London should be affordable and this is reflected in Policy HO1 part E and Policy HO3 which is noted and welcomed.</p> <p>Paragraph 7.45 of the draft Plan makes it clear that demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it</p>	<p>The Council notes and welcomes the supporting comments made in relation to new Local Plan Policy HO 04.</p> <p>In respect of supporting text Paragraph 7.45, the Council notes the respondent's comments. However, based on the representation it is unclear as to why</p>	No further actions required in relation to the new Local Plan.

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							is replaced by an equivalent amount of affordable housing floorspace. This is welcome and aligned with Policy H8 of the LP2021. LBL should also reflect that all development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route (VTR) and should seek an uplift in affordable housing in addition to the replacement of affordable housing floorspace.	Policy HO4 and its supporting text is considered unsound. It is assumed that the representation is seeking to either improve the supporting text wording or make the policy “more-sound”. The new Local Plan is not being examined based on how it can be improved or made “more sound”.	
CON124	REP578	GLA			2	HO 05	Paragraph 7.48 of the draft Plan is clear that there is a need for 121 specialist older persons homes each year in the borough. This is a locally evidenced figure of need which is noted and welcomed. The figure is comparable to the annual borough benchmark for LBL set out in Table 4.3 of the LP2021 for the delivery of 100 specialist older persons homes. The strategic need for older persons housing should be reflected within Policy HO5 to promote this type of development and elevate its importance. Boroughs are encouraged to work positively with providers to identify sites which may be suitable as set out in Policy H13 of the LP2021.	<p>The Council notes the comments made in relation to the new Local Plan Policy HO 05 Accommodation for Older People.</p> <p>The Council considers that the approach towards this matter is sound. The Council considers that the existing policy and supporting text wording is sufficiently clear in respect of the scale of evidenced need. Consequently, no changes are necessary to ensure soundness.</p>	No further actions required in relation to the new Local Plan.
CON124	REP579	GLA			2	HO 06	LBL are seeking an affordable housing tenure split of 70% social rent or London Affordable Rent and 30% intermediate housing. This is consistent with Policy H6 of the LP2021.	The Council notes and welcomes the supporting comments made in relation to new Local Plan Policy HO 06.	No further actions required in relation to the new Local Plan.
CON124	REP580	GLA			2	HO 10	Gypsy and Traveller accommodation Policy HO10 identifies a need for 6 additional pitches up to 2031. Part A of the Policy indicates that a site allocation has been put forward which addresses this need. Paragraph 7.84 makes it clear that Land at Pool Court can meet the borough’s pitch requirements. While this is welcomed the LP2021 makes it clear that boroughs should set out their ten-year pitch requirements and this should illustrate when need for the additional pitches comes into play. As drafted, it is not clear if the need for additional pitches is immediate and that information would be useful. On reading the proposed site allocation for Land at Pool Court, it becomes clear that new pitches could be delivered in the first five years of the Plan. It would be convenient for readers if all relevant information was included in Policy HO10 or supporting text.	<p>The Council notes the comments made in relation to the new Local Plan Policy HO 10. It is highlighted that National policy and guidance for meeting the accommodation needs of our Gypsy, Traveller and travelling show person communities is set out in Planning Policy for Traveller Site (2015). This states that when plan-making “Local planning authorities should set pitch targets for gypsies and travellers” (Para 9) and “identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against their locally set targets” (Para 10 a)). In this respect the Council maintains that the new Local Plan is sound.</p> <p>Based on the representation it is assumed that the respondent is seeking to either improve the supporting text wording or make the policy “more-sound”. The new Local Plan is not being examined based on how it can be improved or made “more sound”. For that reason, no further action is necessary.</p>	No further actions required in relation to the new Local Plan.

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								Furthermore, it is noted that the provision of new Gypsy, Traveller and travelling show person sites does not readily equate to the delivery of new housing (bricks and mortar). It is well established that the delivery of new sites can be subject to a wide variety of issues and sensitivities not typically encountered with bricks and mortar housing. Consequently, the identification of a trajectory, whilst theoretically helpful to the reader, could be counterproductive – placing unrealistic expectations on the new Plan. It is noted that national policy does not require the provision of such trajectories	
CON124	REP581	GLA			2	QD 04	<p>Tall buildings Policy QD4 sets out the borough’s proposed approach towards tall buildings. In the draft Plan tall buildings are defined as those which are over 10 storeys or 32.8m high measured from the ground level to the very top of the building. As such the proposed definition meets the requirements of LP2021 Policy D9 and is welcomed. Policy QD4 is clear that tall buildings should only be developed in areas identified as suitable for tall buildings on the Policies Map. These locations are identified as ‘Tall Building Suitability Zones’ and the policy makes it clear that proposals for tall buildings outside of those areas will be resisted. It is noted and welcomed that this requirement is consistent with Policy D9B of the LP2021. Part C of Policy QD4 then lists what are considered to be appropriate heights in specific tall building locations, thus meeting the requirements of LP2021 Policy D9B2. Tall building locations are illustrated in Figure 5.1.</p> <p>There are six strategic views which run through the borough. These are: Alexandra Palace viewing terrace to St Paul's Cathedral, Primrose Hill summit to the Palace of Westminster, Kenwood viewing gazebo to St Paul's Cathedral, Parliament Hill summit to St Paul's Cathedral, Primrose Hill summit to St Paul's Cathedral, and Primrose Hill summit to St Paul's Cathedral. These are clearly illustrated in Figure 5.2 and Part D of Policy QD4 of the draft Plan makes reference to them, meaning that planning applications will be required to take them into account. This is consistent with Policy HC3 of the LP2021.</p> <p>Paragraph 5.36 of the draft Plan notes the sensitivity of the Maritime Greenwich World Heritage Site (WHS) in relation to tall building proposals in Lewisham. While this is welcomed, illustrating its location on Figures 5.1 and 5.2 would also be</p>	<p>The Council notes and welcomes the supporting representations made in relation to new Local Plan Policy QD 04.</p> <p>The Council also notes the comments made in relation to the policy supporting text and Figures 5.1 and 5.2. The Council highlights, for clarity, that the Maritime Greenwich World Heritage Site, like other similar sites across the Capital, lies beyond the Borough boundary. Plan-making authorities do not normally identify designations or constraints that lie beyond their local plan boundary. The possible exception to this approach may be in circumstances where there is a clearly definable cross-boundary spatial relationship – for example, the alignment of new transport infrastructure (such as a road, railway, or pedestrian route alignment). In this case it is inappropriate for the Borough Council to identify and use a constraint located beyond the local plan boundary and apply to the decision-taking process. The reference to the World Heritage Site within the supporting text is sufficient for the purposes of soundness and future decision-taking.</p> <p>The Council considers that the new Local Plan addresses this matter comprehensively under Policy HE2 and its</p>	<p>No further action required in relation to the new Local Plan for submission.</p> <p>However, in the interests of positive partnership working, the Council could consider the implications of mapping the full extent of the Maritime Greenwich World Heritage site buffer zone on the new Local Plan proposals map.</p>

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							useful and should be considered. To be consistent with Policy HC2 of the LP2021, LBL should include a reference to the WHS in Policy QD4 itself and where tall building development proposals have the potential to affect the WHS itself or its setting there should be a requirement for Heritage Impact Assessments. Paragraph 5.36 refers to the Maritime Greenwich WHS Buffer Zone as being an inappropriate location for tall buildings, but the zone could also benefit from being illustrated in Figures 5.1 and 5.2 for convenience. It is noted that the buffer zone is currently illustrated in Figure 6.1 and LBL may wish to consider including a reference to that map in paragraph 5.36.	associated supported text. The approach clearly sets out the strategic extent of this constraint and how it will be considered during decision-taking. Whilst the GLA's suggested amendment to the new Local Plan may provide an opportunity to improve and make it "more sound", the new Local Plan is not being examined on that basis.	
CON124	REP582	GLA			2	HE 02	Heritage Policy HE2 refers to the Maritime Greenwich WHS Buffer Zone but only the part of the buffer zone located within Lewisham is illustrated in Figure 6.1. We suggest that it may be beneficial to illustrate the entire WHS and its buffer zone in relation to Lewisham as development within the borough can still have an impact on the WHS even if located beyond the buffer zone.	The Council notes the comments made by the respondent. The Council acknowledges that new development can have an impact upon the setting (visual and character) of adjoining heritage assets. This is an established fact in relation to designated Conservation Areas. The Council accepts that this could equally apply in this case. This is reflected in the wording of the policy and its supporting text. Plan-making authorities do not normally identify designations or constraints that lie beyond their local plan boundary. The new Local Plan policy and supporting clearly signal to the reader where further information can be found to inform to decision-taking. The decision-taking process itself will engage with relevant partners – including the neighbouring planning authority and Historic England. The Council suggests that whilst the respondent's suggested amendment to the new Local Plan may provide an opportunity to improve and make the policy "more sound", the new Local Plan is not being examined on that basis.	No further action required in relation to the new Local Plan. However, in the interests of positive partnership working, the Council could consider the implications of mapping the full extent of the Maritime Greenwich World Heritage site buffer zone on the new Local Plan proposals map.
CON124	REP583	GLA			2	EC 02	Employment Strategy Overall, the spatial strategy for industrial capacity is not sufficiently supported by necessary evidence. In providing suitable evidence, the following should also be taken into account:	The Council notes the range of comments made in relation to the new Local Plan's approach towards meeting future employment land needs. To make sense and create order the Council has determined to align these specific comments to new Local Plan Policy EC 02	To provide a clear data driven narrative to the spatial strategy, site allocations, and planning policies relating to employment need, the Council will prepare a topic/ supplementary evidence paper. This will specifically explore

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							<ul style="list-style-type: none"> The Plan should make provision for emerging sectors and increased demand for logistics space. The new and emerging sectors, include film and tv production, data centres and dark kitchens, and should be considered as part of LBL's industrial evidence to establish LBL's industrial capacity requirements over the Plan period and ensure that the capacity is appropriate. Their potential impacts should also be taken into consideration. LBL is located within the Central Services Area (CSA) and as such the council should follow the guidance in paragraph 6.4.7 of the London Plan, recognising the need to provide essential services to the CAZ and Northern Isle of Dogs. In particular, priority should be given to sustainable 'last mile' distribution/logistics, 'just-in-time' servicing, waste management and recycling and land to support transport functions. In contrast, the draft Plan is resistant to warehousing and distribution proposals. The draft Plan makes it clear that development proposals for warehousing and distribution in LSIS are to follow a sequential approach, first ruling out SIL sites and then potential sites in neighbouring boroughs and the London southeast sub-region before they will be considered in the borough. LBL's evidence suggests that demand is greatest for light industrial and office related uses but it does not clearly set out what the need is for B8, B2 and Eg(iii) industrial capacity over the plan period. LBL's industrial evidence was completed prior to the pandemic and the need for B8 uses may have increased as a result since that time. <p>Employment Land Evidence Base LBL carried out an Employment Land Study in 2019 which forecasts a need for 21,800sqm of net additional office floorspace up to 2038. However, the study does not include an individual figure of need for industrial capacity over the life of the Plan. In addition, the borough's requirement for industrial capacity should be broken down into respective requirements for B2, B8 and light industrial uses. Instead, the draft Plan includes a generic figure for 21,800sqm of employment floorspace need up to 2038 which is ambiguous and lacks necessary clarity and detail. The draft local plan therefore does not meet the requirement of LP2021 Policy E4A, as there is no up-to-date demand-side evidence to assess.</p> <p>Employment Land Requirement In the Mayor's response to LBL's Local Plan Regulation 18 consultation he stated that the Local Plan should identify, coordinate, and transparently set out the overall land and floorspace requirements as well as provision of an appropriate</p>	<p>Protecting employment land and delivering new workspace.</p> <p>Evidence – The Council considers that the new Local Plan is justified. It is supported by a robust and proportionate evidence base, which includes an Employment Land Study. The Council notes that the Greater London Authority has recently published new strategic-level evidence that appears to show that strategic employment land losses now outweigh the scale of provision being planned-for through the new Local Plan. The Council concludes that the narrative merits further assessment. Consequently, the Council agrees to prepare supplementary evidence that will set out a better-defined representation of need, gains, and losses and how these relate to the Spatial Strategy, site allocations and planning policies.</p> <p>The Council is working in partnership with the GLA to resolve the concerns raised in relation to the new Local Plan Policy EC 02. There is broad agreement that the preparation and publication of the above-mentioned topic paper provides an opportunity to potentially resolve the GLA's concerns around general conformity – primarily by providing a clearer understanding of demand, net gains, and losses.</p> <p>In addition, the Council will seek to provide additional supporting evidence that demonstrates the viability, deliverability and developability of the BDU SIL and LSIS site allocations. This will help to demonstrate that sufficient strategic industrial land available to meet demand. The Council will also explore the possibility of identifying additional SIL should this be necessary.</p> <p>The Council will also explore the potential to introduce modifications to site</p>	<p>industrial employment need, gains, and losses. The topic paper will be submitted to the examination in support of the new Local Plan. Where appropriate it will inform the Council's consideration of possible modifications. Any modifications will be discussed with the GLA and agreed through the examination process. It is intended that agreed modifications will be referenced in the Statement of Common Ground between the two parties.</p> <p>The Council will also prepare additional supporting evidence that demonstrates the deliverability and developability of the BDU site to deliver a mix of new SIL and LSIS provision.</p> <p>Subject to there being a demonstrable need the Council will consider the possible identification of new SIL, or candidate SIL. The Council will provide evidence that demonstrates that the possible new SIL is a viable proposition, is accessible by road, and meets the operational requirements set out in the London Plan. The Council will work with the GLA to agree this position through a SoCG during the examination. Subject to it being necessary and justified the Council will propose the identification of the new SIL as a modification to the new Local Plan.</p> <p>The Council will identify opportunities to introduce modifications to site allocations, planning policy and supporting text that encourage industrial intensification, where it is possible, and warehousing and just in time</p>

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							<p>mix of industrial uses that meets the need for all industrial functions, particularly within Use Class B8.</p> <p>More focus on B8 within SIL / LSIS may also be appropriate, given that the new Use Class E could potentially erode former B1(c) uses within SIL / LSIS designations. This matter remains unresolved in the current version of the draft Plan</p> <p>Additional Office Space Policy EC2 establishes a need for 21,800sqm of additional employment floorspace up to 2038. LBL's Employment Land Study (2019) clarifies that this figure of need is purely for office space and that should be made clearer in the draft Plan</p> <p>Table 8.1: Lewisham's Employment Land Hierarchy As currently written, it is the mayor's opinion that the draft Plan is not in general conformity with the LP2021 for two reasons related to the proposed management of the borough's industrial land. Firstly, the proposed downgrading of three parcels of industrial land from Strategic Industrial Locations (SILs) to Locally Significant Industrial Sites (LSIS) has not been supported by evidence robust enough to demonstrate that the proposed designation of new SIL at the Bermondsey Dive Under site is suitable replacement to realistically support functional SIL."</p> <p>Lewisham and Catford are designated as Major Town Centres and Lewisham is identified as having future potential to be upgraded to Metropolitan Town Centre status (London Plan Table A1.1). The Local Plan seeks to support the envisaged transformation in a sustainable way highlighting improvements to accessibility and public realm as well as Site Allocations supporting significant levels of growth. Beyond quantitative aspects, it will be important for LBL to promote a broad mix of diverse uses. LBL should put in place a town centre strategy to demonstrate how the borough will support a transformation away from car-based travel while exploring the potential for residential mixed-use opportunities within any existing retail parks within the borough.</p> <p>Paragraph 8.10 Paragraph 8.10 makes it clear that LBL will ensure that there will be no net loss of industrial capacity in the borough and that net gains will be delivered where possible. This is generally positive but does not accord with the proposed downgrading of designated SIL or the concerns set out regarding the replacement capacity.</p>	<p>allocations, planning policy and supporting text that encourage industrial intensification, where it is possible, and warehousing and just in time service provision, where it supports the CAZ.</p>	<p>service provision, where it supports the CAZ. It is intended that agreed modifications will be referenced in the Statement of Common Ground between the two parties. These modifications, where they are considered necessary will be introduced at an appropriate point in the examination process.</p>

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							<p>In the absence of established up-to-date need for industrial capacity over the life of the Plan, and broken down into component parts, it is impossible to determine if the proposed approach will meet the borough's industrial needs over the Plan period.</p> <p>Paragraph 8.12 The LBL's Employment Land Study 2019 bases industrial need on the London Industrial Land Demand Study (2017) (based upon 2015 survey data) and relies on the surplus of 12.4ha of industrial land up to 2041 set out in that study. Since that time the Mayor has published more data² up-to-date industrial land supply which demonstrates that between 2015 and 2020 LBL has already released 16.3ha of industrial land to other non-industrial uses. This is above the surplus previously identified and means that it is possible that LBL now have a positive demand for industrial capacity over the Plan period. Therefore, LBL's employment land evidence may not support the approach set out in the Plan.</p>		
CON124	REP584	GLA			2	EC 05	<p>Industrial land It is Lewisham's intention to downgrade the designation of Strategic Industrial Locations (SIL) at three sites: Trundley's Road/Apollo Business Centre, Mercury Way Waste Sites and Evelyn Court SIL to Locally Significant Industrial Locations (LSISs). This would allow for the co-location of industrial and non-industrial uses. To be consistent with Policies E4 and E7B of the London Plan, Lewisham must re-provide this SIL capacity, in addition to any demand identified by an up-date evidence base as part of the borough's strategic approach to meeting industrial capacity needs over the Plan period.</p> <p>LBL are proposing a new SIL at the Bermondsey Dive Under (BDU) site in order to re-provide the SIL capacity for the losses of SIL at Trundleys Road/Apollo Business Centre, Mercury Way Waste Site and Evelyn Court. However, LBL have not established precisely how much SIL capacity can realistically be provided at the BDU site. Without that information we cannot be clear if the Bermondsey Dive Under Site is capable of matching the lost capacity.</p> <p>It should be noted that for the BDU site to be functional SIL it must be capable of supporting the full range of industrial uses,</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 05.</p> <p>The Council seeks to clarify that the new Local Plan is not seeking to downgrade any employment land. It is instead seeking a re-allocation of the designated employment land from SIL to LSIS, so that a different and more suitable range of employment uses can take place on these sites whilst allowing the sites to be intensified through co-location with residential uses.</p> <p>For further clarification, there are three sites where the new Local Plan proposes to change the designated employment status from SIL to LSIS. These sites are all located in Lewisham's North Area and are 1) site allocation 5 Surrey Canal Road and Trundleys Road, 2) site allocation 6 Apollo Business Centre, and 3) site allocation 3 Evelyn Court. Whilst the Employment Land</p>	<p>To provide a clear data driven narrative to the spatial strategy, site allocations, and planning policies relating to employment need, the Council will prepare a topic/ supplementary evidence paper. This will specifically explore industrial employment need, gains, and losses. The topic paper will be submitted to the examination in support of the new Local Plan. Where appropriate it will inform the Council's consideration of possible modifications. Any modifications will be discussed with the GLA and agreed through the examination process. It is intended that agreed modifications will be referenced in the Statement of Common Ground between the two parties.</p>

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							<p>including those for B2 and B8 type activities. If the site is only capable of supporting light industrial uses then it cannot be fully considered to be a suitable replacement for the loss of SIL at Trundleys Road/Apollo Business Centre, Mercury Way Waste Site and Evelyn Court.</p> <p>The BDU site is complex and access to the site is made difficult for large vehicles as a result of a number of low railway bridges. It is very likely that investment would be required to address access issues and these have not been investigated or evidenced. Without more detailed information about these issues or about the need requirements that must be met it is uncertain whether the site can realistically accommodate (sufficient) suitable and functional SIL replacement capacity.</p>	<p>Study 2019 found the Mercury Way site as suitable for co-location, it is an important waste facility within the borough and the Local Plan is not proposing to change the designation of this site – it retains the Mercury Way site as SIL.</p> <p>This reflects real-world conditions – in the form of recent usage of the sites, planning history, development commitments and market signals. The plan-making approach to these sites is entirely sound.</p> <p>The Council acknowledges that changes/ losses to the extent of Strategic Industrial Locations need to be resolved by identifying new capacity. For this reason, the Council has sought to do this by identifying new Strategic Industrial Location provision at the Bermondsey Dive Under site. The proposed site allocation is broadly supported by the landowner interests, who are themselves promoting the land for commercial use. One of those interests, Network Rail, have indicated that they will using their site for strategic industrial uses. Accordingly, the Council considers this approach to be sound and informed by market signals.</p> <p>The Council acknowledges that the Bermondsey Dive Under site could be supported by further detailed evidence. This could provide an assessment of its deliverability, developability, capacity and identify a possible trajectory for it coming forward.</p> <p>Mercury Way For the purposes of clarity, the Mercury Way site is not one of the three sites where the new Local Plan is seeking to change the designated employment status from SIL to LSIS. Mercury Way is an important waste facility for the borough and the new Local Plan retains this site as SIL. It is unclear as to which specific London Plan policy provides the basis for</p>	<p>The Council will also prepare additional supporting evidence that demonstrates the deliverability and developability of the BDU site to deliver a mix of new SIL and LSIS provision.</p> <p>Subject to there being a demonstrable need the Council will consider the possible identification of new SIL, or candidate SIL. The Council will provide evidence that demonstrates that the possible new SIL is a viable proposition, is accessible by road, and meets the operational requirements set out in the London Plan. The Council will work with the GLA to agree this position through a SoCG during the examination. Subject to it being necessary and justified the Council will propose the identification of the new SIL as a modification to the new Local Plan.</p>

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								this specific representation. It is assumed that London Plan Policy E4 Land for industry, logistics and services to support London's economic function is the basis for the respondent's requirement. That policy states that "A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained". This requirement specifies a comprehensive range of (about ten) operational requirements. It is assumed that this is the basis for the GLA's statement. Should that be the case, the Borough Council suggests that the GLA's application of the requirements under Policy E4 is overly binary, unrealistic, and unreasonable.	
CON124	REP585	GLA			2	EC 06	<p>Office Development</p> <p>It is noted that Policy EC6 promotes office development within the borough's LSIS and Policy EC7 promotes office development within the borough's MELs. This approach is not consistent with the LP2021. Policy SD7 of the LP2021 promotes a town centres first approach and this is reflected in Table A1.1 of the LP2021 which establishes that Lewisham Town Centre, has demand for existing office functions, generally within smaller units. The correct approach is set out in Policy E1D of the LP2021 which makes it clear that new office development should be focussed in the borough's town centres and other existing office clusters where they are supported by improvements to walking, cycling and public transport as set out in Part D of the Policy. If Use Class E is going to be provided on industrial land, this needs to be done in a way that does not prejudice meeting the needs of B2 and B8 uses, and ensuring there is still sufficient industrial land available for those E uses that require an industrial location. LBL should amend Part A of Policy EC6 and EC7 accordingly.</p> <p>Storage and Warehousing</p> <p>Policy EC6 part C and paragraph 8.34 make it a requirement that all development proposals for storage and warehousing must deliver a reasonable proportion of flexible workspace or units to meet the needs of micro, small and medium sized businesses, the amount of which will be considered on a case-by-case basis. While the intention to provide for suitable space for small and medium sized businesses is recognised and welcomed the proposed approach is not consistent with that set out in Policy E2 of the LP2021. LBL is advised to follow the</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 06 Locally Significant Industrial Sites (LSIS).</p> <p>Office Development</p> <p>For clarity, the new Local Plan's approach to this matter is to protect and secure new LSIS provision through the delivery of Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and related Sui Generis uses, with priority being given to office and light industrial uses (on LSIS sites).</p> <p>The Council notes that the representation states that the new Local Plan "promotes" office development within Locally Significant Industrial Sites. The definition of the verb promote is to "actively seek to make something happen". The inference is that the policy seeks to elevate office uses above all others. The Council does not consider this to be the case.</p> <p>Following further discussions, the Council notes the GLA's concern that land redesignated from SIL to LSIS may, in certain extreme circumstances, be at risk of being lost to non-industrial uses. This is a direct consequence of the Government's</p>	<p>To provide a clear data driven narrative to the spatial strategy, site allocations, and planning policies relating to employment need, the Council will prepare a topic/ supplementary evidence paper. This will specifically explore industrial employment need, gains, and losses. The topic paper will be submitted to the examination in support of the new Local Plan. Where appropriate it will inform the Council's consideration of possible modifications. Any modifications will be discussed with the GLA and agreed through the examination process. It is intended that agreed modifications will be referenced in the Statement of Common Ground between the two parties.</p> <p>The Council will identify opportunities to introduce modifications to site allocations, planning policy and supporting text that encourage industrial intensification, where it is possible, and warehousing and just in time service provision, where it</p>

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							guidance set out in Part D of that policy which is clear that development proposals for new B Use Class greater than 2,500sqm, or a locally determined lower threshold based on up to date evidence, should consider the scope to provide a proportion of flexible workspace or smaller units that are suitable for micro, small and medium-sized enterprises. In light of this, paragraph 8.34 should be amended accordingly to reflect relevant evidence to support the proposed approach.	<p>changes to the permitted development regime in relation to Class E. The Council acknowledges that the London Plan is now out-of-date in relation to this matter.</p> <p>Nevertheless, the Council maintains that the policy towards LSIS is sound. Policy EC 06 is clear in stating -</p> <p>“LSIS will be protected for Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and related Sui Generis uses, with priority being given to office and light industrial uses.”</p> <p>The frequent reference to the mix of employment uses that could be considered and delivered upon LSIS demonstrates that the policy remains sound and consistent with national policy and the London Plan. It is unclear what additional the GLA are seeking through modification.</p> <p>Storage and Warehousing The Council could consider an amendment or an addition to the new Local Plan supporting text that seeks to respond to the GLAs request that priority be given to sustainable ‘last mile’ distribution/logistics, ‘just-in-time’ servicing, and land to support transport functions.</p>	supports the CAZ. It is intended that agreed modifications will be referenced in the Statement of Common Ground between the two parties. These modifications, where they are considered necessary will be introduced at an appropriate point in the examination process.
CON124	REP586	GLA			2	EC 07	<p>Mixed-use Employment Locations The draft Plan proposes local designations called ‘Mixed-use Employment Locations’ (MELs). Eight are proposed in total and they are described as larger redundant and/or under used industrial sites. These areas are essentially ‘non-designated industrial sites’ and as such LP2021 Policy E7C is relevant. This makes it clear that mixed-use or residential development proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted local Development Plan Document for industrial, storage or distribution floorspace and is provided as part of mixed-use intensification. In light of this the approach for MELs should be amended accordingly.”</p> <p>Job Uplift</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 07 Mixed-use Employment Locations (MELs).</p> <p>Mixed-use Employment Locations The identification and protection of Mixed-use Employment Locations across Lewisham is an established local plan-making/ place-shaping approach. Contrary to the respondent’s representation the sites identified through Policy EC7 are being promoted for mixed-use development – “Development proposals must maximise the amount of Class E(g) office and light industrial uses through site redevelopment, provide a demonstrable and significant uplift in the number of jobs</p>	To provide a clear data driven narrative to the spatial strategy, site allocations, and planning policies relating to employment need, the Council will prepare a topic/ supplementary evidence paper. This will specifically explore industrial employment need, gains, and losses. The topic paper will be submitted to the examination in support of the new Local Plan. Where appropriate it will inform the Council’s consideration of possible modifications. Any modifications will be discussed with the GLA and agreed through the examination process. It is

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							<p>We note that LBL expect development proposals in MELs and non-designated industrial sites to result in an uplift in job numbers. However, it should be recognised that some essential industrial activities may have comparatively low job densities and the approach could inadvertently lead to further erosion of industrial capacity.</p>	<p>and make provision for high quality workspace, taking into account the operational requirements of differing land uses, in line with the Agent of Change principle and ensuring that the workspace is appropriately integrated within the MEL and its surrounding area.” This positive approach to growth is consistent with the London Plan.</p> <p>In conclusion, the Council considers that the approach towards the MELs sites provides a positive framework for securing place-making on these extensive historic industrial sites.</p> <p>Job Uplift The Council acknowledges that there may be scenarios where “essential” industrial activities yield comparatively low job densities. However, the reverse is equally possible – it is noted that the respondent has not provided any evidence to support their assumption. The Council concludes that on balance this is a matter of planning judgement, which can be better considered on a case-by-case basis through decision-taking.</p>	<p>intended that agreed modifications will be referenced in the Statement of Common Ground between the two parties.</p> <p>The Council will identify opportunities to introduce modifications to site allocations, planning policy and supporting text that encourage industrial intensification, where it is possible, and warehousing and just in time service provision, where it supports the CAZ. It is intended that agreed modifications will be referenced in the Statement of Common Ground between the two parties. These modifications, where they are considered necessary will be introduced at an appropriate point in the examination process.</p>
CON124	REP587	GLA			2	EC 12	<p>Town Centre First Policy EC12 Part B sets out an intention to follow a ‘town centres’ first approach which is consistent with Policy SD7 of the LP2021. However, LBL should recognise and understand that the LP2021 identifies offices as a town centre use which is set out clearly in Policy SD7A of the LP2021 and this should be reflected in the draft Plan accordingly.</p> <p>Major Town Centres Lewisham and Catford are designated as Major Town Centres and Lewisham is identified as having future potential to be upgraded to Metropolitan Town Centre status (London Plan Table A1.1). The Local Plan seeks to support the envisaged transformation in a sustainable way highlighting improvements to accessibility and public realm as well as Site Allocations supporting significant levels of growth. Beyond quantitative aspects, it will be important for LBL to promote a broad mix of diverse uses. LBL should put in place a town centre strategy to demonstrate how the borough will support a transformation away from car-based travel while exploring the potential for</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC12.</p> <p>Town Centre First The Council notes that national planning policy clearly sets out the “town centre first” approach and the uses that will apply to under NPPF Para 86. It is noteworthy that the main body text of the NPPF is not exhaustive in listing town centre uses. That list is relegated to NPPF Annex 2: Glossary Main Town Centre Uses (Page 68).</p> <p>The proposed wording of new Local Plan Policy EC12 clearly states that – “A ‘town centres first’ approach will be used to assess development proposals for main town centre uses, in line with the London Plan and the NPPF. The Sequential Test will</p>	<p>No further action required in relation to the new Local Plan.</p>

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							residential mixed-use opportunities within any existing retail parks within the borough	<p>be applied to ensure that main town centre uses are directed to locations within town centres or, if no suitable town centre sites are available or expected to become available within a reasonable period, to appropriate edge-of-centre locations.”</p> <p>It is not the role of the new Local Plan to repeat the content of either the NPPF or the London Plan. The NPPF clearly sets out what Main Town Centre uses are; the new Local Plan provides clear cross reference to both the NPPF and the London Plan.</p> <p>The Council considers that the new Local Plan is consistent with national planning policy and is sound. No further actions are necessary.</p> <p>Major Town Centres It is unclear to the Council which tests of soundness this representation is alluding to.</p> <p>The suggestion that the Council should prepare a specific strategy for Lewisham Town Centre that supports a transformation away from car-based travel is noted and discounted. The Council highlights that this is already a Borough-wide objective, supported by the Spatial Strategy and infrastructure delivery plan. The preparation of such a specific strategy at such a late stage in the process is unnecessary for the purpose of soundness.</p>	
CON124	REP588	GLA			2	EC 18	Night-time economy The LP2021 identifies the town centres of Catford, New Cross/New Cross Gate, Lewisham and Blackheath as all having a night-time economy NT3. This means that these areas have a nighttime economy with more than local significance, and this is reflected clearly in Figure 8.12 of the draft Plan which is very welcome. The proposed approach to direct night-time uses to these areas is consistent with Policy HC6 of the London Plan but LBL could go further and explore the benefits of diversifying the night-time mix of uses as set out in paragraph 7.6.9 of the LP2021.	<p>The Council notes the respondent’s comments and welcomes the broad level of support provided in relation to the new Local Plan Policy EC 18.</p> <p>However, the respondent’s suggestion is not considered necessary to make the new Local Plan sound. As with other representations, this suggestion seeks to improve the policy, or make it “more sound”. For the purposes of clarity, the new Local Plan is not being examined on how it could be improved or made “more</p>	No further action required in relation to the new Local Plan.

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								sound". Consequently, no further actions are necessary.	
CON124	REP589	GLA			2	GR 01	Green infrastructure Paragraph 10.3 of the draft Plan reflects the Mayor's target to make London at least 50% green by 2050 and this is welcomed.	The Council notes the respondent's comments and welcomes the support provided in relation to the new Local Plan Policy GR 01.	No further action required in relation to the new Local Plan.
CON124	REP590	GLA			2	GR 02	It is noted that Policy GR2 of the draft Plan intends to give the same status to locally designated Local Green Spaces as to Metropolitan Open Space (MOL). If LBL hasn't already done so, it may be appropriate to consider the option of designating some of these spaces as MOL where they meet the requirements of the 4 tests set out in Policy G3B of the LP2021. For example, if Local Green Space contributes towards the physical structure of London by being clearly distinguishable from the built-up area it could be considered for its suitability as MOL.	The Council notes the comments made in relation to the new Local Plan Policy GR 02. However, the GLA's suggestion is not considered necessary to make the new Local Plan sound. Consequently, no further actions are necessary.	No further action required in relation to the new Local Plan.
CON124	REP591	GLA			2	SD 01	Climate change We note in Policy SD1 of the draft Plan the ambition of the borough to be net zero carbon which is welcomed. Paragraph 11.3 reflects the Mayor's ambition set out in the LP2021 for London to be net zero carbon by 2050. LBL should note that the Mayor has since updated this target and now intends that London is net zero carbon by 2030.	The Council welcomes the respondent's broad support for this component of the new Local Plan. For clarity, the content of new Local Plan supporting text Paragraph 11.3 remains factually correct. The Borough Council acknowledges that the Mayor may have revisited the GLA's aspirations and announced a new ambitious target for net zero carbon for the Capital. However, any new target is not part of the adopted London Plan. Fact. The Council notes that the Mayor's new "target" has not been tested, either through the plan-making or any other process. It is understood that the Mayor is commission further technical work to establish whether his new "target" is achievable.	No further action required in relation to the new Local Plan.
CON124	REP592	GLA			2	SD 06	Air Quality The requirement in the draft Plan that development proposals should be air quality neutral as set out in Policy SD6 is consistent with Policy SI 1 in the LP2021 and this is noted and welcomed. It is recognised that Part C of Policy SD6 also sets out a requirement for air quality assessments for development proposals in Air Quality Focus Areas (AQFAs). AQFAs are areas that already exceed the EU annual mean limit for nitrogen dioxide and have high levels of human exposure and these have been illustrated very clearly in Figure 11.2 which is very useful. LBL should be requiring that development proposals in AQFAs incorporate design measures to limit exposure to currently poor air quality. This requirement is	The Council notes and welcomes the support offered in relation to the new Local Plan Policy SD 06 Improving air quality. The Council takes this issue very seriously. The comments made in relation to development proposals incorporating design measures to limit exposure to poor air quality are noted. For clarity, Policy SD 06 is focused upon improving air quality rather than mitigating harm. It is noted that the London Plan already addresses	No further action required in relation to the new Local Plan.

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							different from a requirement for Air Quality assessments and should be recognised as such.	<p>this matter through its Policy SI 1 Improving air quality, which requires –</p> <p><i>“In order to meet the requirements in Part 1, as a minimum...b) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures”</i></p> <p>As the London Plan forms part of the Borough’s development plan there is no reason for the new Local Plan too slavishly regurgitate its content. Nevertheless, this is a matter that can be comprehensively considered by decision-takers through the new Local Plan’s suite of planning policies. For example, through new Local Plan Policies QD 1 Delivering high quality design in Lewisham; HO1 Meeting Lewisham’s housing needs; and GR1 Green infrastructure and Lewisham’s Green Grid.</p>	
CON124	REP593	GLA			2	SD 09	Safeguarded Wharves Policy SD9 Part E of the draft Plan makes it clear that Convoys Wharf is one of London’s safeguarded wharves. The intention to continue to safeguard it is consistent with the approach in the LP2021 and the promotion of water transport there is also aligned with Policy SI 15E of the LP2021 which is clear that safeguarded wharves should only be used for waterborne freight-handling use, including consolidation centres.	The Council notes the comments and support made in relation to the new Local Plan Policy SD 09.	No further action required in relation to the new Local Plan.
CON124	REP594	GLA			2	TR 01	<p>We note that LBL are proposing the de-designation of two parcels of MOL. One is located in Catford and is necessary for the realignment of the South Circular. The other relates to Lewisham Town Centre and was part of a planning consent granted in 2006.</p> <p>Policy G3C of the LP2021 sets out that any alterations of MOL should be undertaken through the Local Plan process and should only be changed in exceptional circumstances. Given the very specific circumstances related to each of the two situations the Mayor does not object to the proposed boundary changes</p>	The Council notes the comments and support made in relation to the new Local Plan Policy TR 01.	The Council will seek to make detailed amendments to the extent of the designated Metropolitan Open Land at the Jubilee Sports Ground following the sign-off of the final detailed design of the Catford South Circular Road A205 road realignment. Should this be agreed before the close of the Examination Hearing sessions, the Council will seek to introduce it as a modification to the new Local Plan.

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CON124	REP595	GLA			3	Paragraphs 13.7 – 13.8	While this potential growth is welcomed, it is less clear what the borough's growth needs are over the life of the Plan. Only then can we understand how the strategic approach is able to contribute towards meeting those needs. The Plan period starts in 2020 and runs until 2040.	<p>The Council notes the comments made in relation to these supporting text paragraphs.</p> <p>The new Local Plan must be read in its entirety. The new Local Plan's overarching vision and strategy is set out under Part One Planning for an Open Lewisham. Further detail on how the delivery of planned-for growth will meet the Borough's needs is set out under Policies OL 01, HO 01 and EC 02.</p> <p>The purpose of Para 13.7 and 13.8 is to provide the reader with a summary of anticipated growth being delivered from planned-for site allocations. It is not intended for these paragraphs to provide an overview of the wider spatial strategy. On that basis no further action is considered necessary.</p>	In the interest of resolving the respondent's stated concern the Borough Council could consider a modification to Policy OL 01 that sets out the quantum of planned-for growth – new housing, employment, retail and other floorspace.
CON124	REP596	GLA			3	Table 13.1	The spatial approach is to divide the borough into five respective character areas: South, Central, Western, Eastern and Northern. Table 13.1 in relation to the proposed site allocations then breaks down indicative growth capacities covering a 20-year period for each of the character areas in relation to new homes, employment floorspace and town centre uses. It sets out the intention to deliver between 24,413 and 26,887 new homes and 237,228sqm of employment floorspace over the course of the Plan. This approach is clear, direct and very comprehensive. This clarity is welcome, but the employment figures would further benefit by being divided into their indicative component growth figures for Class E and Class B uses. Given the breadth of Class E uses, consideration could be given to where these might be appropriately located e.g. town centres, designated industrial land."	<p>The Council notes the comments made in relation to Table 13.1.</p> <p>Whilst it may be helpful to some readers to further disaggregate the figures contained within Table 13.1 it is unclear why the absence of that level of detail makes this part of the new Local Plan unsound. The supporting text clearly states that the purpose of Table 13.1 is to provides a summary of the overall delivery outcomes expected by the site allocations. Further information on the anticipated growth yields, from the site allocations, is contained within the individual site allocation policies.</p> <p>Although the Borough Council accepts that there may be "further benefit" is providing this additional layer of detail, it is not a matter of soundness. No further action necessary.</p>	No further action required in relation to the new Local Plan.
CON124	REP597	GLA			3	Lewisham's Neighbourhoods and Places	Site allocations The proposed site allocations include figures for proposed employment and main town centre uses which provide for a basic level of detail. The proposed site allocations combine office and industrial uses into a single 'employment space' figures. Proposals for office and industrial development	The Council notes and welcomes the general comments made by the respondent in relation the new Local Plan Part 3 Lewisham's Neighbourhoods and Places; with specific reference to the site	The Council will consider amendments to individual site allocations that identify the specific employment uses, particularly industrial uses, being

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						General	are treated very differently in the LP2021 and the site allocations should include independent figures for both so that the requirement for each is clearer in relevant allocations and can be treated correctly. Setting out proposals for 'employment use' for some allocations risks the loss of valuable industrial capacity to speculative proposals for office development. Office development should be directed to the borough's town centres while industrial capacity should be focused in the borough's designated and non-designated industrial areas. The site allocations should therefore include separate categories for indicative capacities for office and for industrial proposals. It would also be useful to understand what uses LBL includes under that heading - where proposals for industrial capacities are set out in individual allocations it would be very useful if industrial requirements were broken down even further into their component B2, B8 and light industrial uses. The proposed allocations also include proposals for main town centre uses. Town centre uses should be consistent with those set out in Policy SD7A of the LP2021 but as written it is not clear whether the heading includes provision for office development. This clarity would be welcomed.	<p>allocations included under this part of the Plan.</p> <p>Site Allocation Quantum and Mix of Uses The Council notes the comment that the individual site allocations, across Part 3, identify the quantum and mix of uses proposed for each site allocation. The Council understands the Greater London Authority's concern that the term employment use is all encompassing and may an unintended consequence, in certain very specific circumstances, of degrading the industrial potential of sites (appropriate for that use). The Council suggests that this is in part due to the changes in the Use Class Order and introduction of Class E – which have rendered certain specific elements of the London Plan out of date. Nevertheless, the Council agrees to revisit the site allocations and will identify where possible the specific employment uses being sought from the site allocation.</p> <p>Where it is appropriate the Council will consider the opportunity to promote specific sites for industrial intensification, with an emphasis upon B2 and B8 uses.</p>	sought from that site. Where appropriate the Council will also identify the opportunities, present on site, for industrial intensification of B2 and B8 uses. These opportunities will be identified through the supplementary evidence being prepared in support of the submission.
CON124	REP598	GLA			3	LCA SA 08	The site is home to what appears to be non-designated industrial uses. In light of this the allocation should take into account Policy E7C of the LP2021. This sets out that mixeduse or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. It is noted that the site was granted planning permission in 2018 for residential mixed-use development. If this site is needed as part of a wider strategy to meet Lewisham's industrial needs, site allocation should be considered in order to provide industrial capacity should the extant planning permission lapse.	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 08.</p> <p>The reference in the new Local Plan to planning consent being granted in 2018 is incorrect and has been mistakenly included in this site allocation. The planning application referenced relates to a nearby site and there is no extant planning permission available to lapse. The Borough Council will seek to rectify this through a minor modification.</p> <p>Site allocation LCA SA 08 100-114 Loampit Vale seeks to incorporate main town centre, commercial and residential uses as this will provide for a more optimal use of land that supports the town centre's</p>	Seek to amend the wording of the new Local Plan Policy LCA SA 08 to reflect the factual planning history of the site allocation. Suggest that this amendment be introduced as a minor modification.

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								vitality and viability at this important transitional site at the edge of the town centre. The site allocation does specify that the maximum viable amount of employment floorspace must be provided, in line with Policy EC8 (non-designated employment sites).	
CON124	REP599	GLA			3	LCA SA 15	The site is home to what appears to be non-designated industrial uses. In light of this the allocation should take into account Policy E7C of the LP2021. This sets out that mixed use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. It is noted that the site was granted planning permission in 2020 for residential mixed-use development. If you find you need this site as part of a wider strategy to meet your industrial needs, you should consider its allocation in order to provide industrial capacity should the extant planning permission lapse.	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 15.</p> <p>The Council considers that the fact that part of this site has planning consent demonstrates that the concept of mixed-use development is suitable in this location and has already been established. The Council considers that it is unrealistic to assume that should the consent lapse, the landowners will want to revert to industrial uses, which will hinder the site coming forward for development.</p> <p>Furthermore, the Council notes that the site (35 Nightingale Grove) is identified as a site allocation for mixed use housing with business/employment in the adopted Site Allocations Local Plan (2013).</p> <p>The Site Allocation already acknowledges that the maximum viable amount of employment floorspace must be re-provided, in line with Policy EC8 (Non designated employment sites).</p>	No further action required in relation to the new Local Plan.
CON124	REP600	GLA			3	LNA SA 03	LBL propose to downgrade this area of currently designated SIL to LSIS. It is suggested that SIL re-provision will be made at Bermondsey Dive Under site. As discussed elsewhere there is currently insufficient evidence to demonstrate that the BDU site is capable of delivering functional and suitable SIL replacement capacity. This is considered essential to facilitate the proposed change of designation from SIL to LSIS in this proposed allocation to bring about co-location of industrial and non-industrial uses on this site.	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 03.</p> <p>The Council seeks to clarify that the new Local Plan is not seeking to downgrade any employment land. It is instead seeking a re-allocation of the designated employment land from SIL to LSIS, so that a different and more suitable range of employment uses can take place on these sites whilst allowing the sites to be intensified through co-location with residential uses.</p>	The Council will identify opportunities to introduce modifications to site allocations, planning policy and supporting text that encourage industrial intensification, where it is possible, and warehousing and just in time service provision, where it supports the CAZ. It is intended that agreed modifications will be referenced in the Statement of Common Ground between the two parties. These modifications, where they are considered necessary will be introduced at an

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								<p>It is noted that the proposed site allocation previously formed part of the wider SIL designation as identified in the London Plan. However, the site has commitments that will change its fundamental use. The draft policy states (and requires) –</p> <p>“Whilst replacement provision of SIL land will be made at the Bermondsey Dive Under site, development should be demonstrably employment-led to ensure the long-term viability of commercial uses at the site and wider SIL area. Further details on calculating industrial capacity are set out in with Policy EC6 (Locally Significant Industrial Sites).”</p> <p>The respondent has not provided evidence that challenges the proposed change to LSIS status. Arguably the Borough Council’s proposal will result in a higher density/ intensity employment use. It also has the potential to secure other benefits. This would be in accordance with London Plan Policy E7.</p> <p>It is arguable that the nature and quality of this site provides no qualitative improvement to the land being promoted at the Bermondsey Dive Under (see below). Given its planning history and the known developer intentions it is unreasonable to assume that the site could return to its former SIL designation.</p>	appropriate point in the examination process.
CON124	REP601	GLA			2	LNA SA 05	<p>LBL propose to downgrade this area of currently designated SIL to LSIS. It is suggested that SIL re-provision will be made at Bermondsey Dive Under site. As discussed elsewhere there is currently insufficient evidence to demonstrate that the BDU site is capable of delivering functional and suitable SIL replacement capacity. This is considered essential to facilitate the proposed change of designation from SIL to LSIS in this proposed allocation to bring about co-location of industrial and non-industrial uses on this site.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 05.</p> <p>The Council seeks to clarify that the new Local Plan is not seeking to downgrade any employment land. It is instead seeking a re-allocation of the designated employment land from SIL to LSIS, so that a different and more suitable range of employment uses can take place on these sites whilst allowing the sites to be intensified through co-location with residential uses.</p>	The Council will identify opportunities to introduce modifications to site allocations, planning policy and supporting text that encourage industrial intensification, where it is possible, and warehousing and just in time service provision, where it supports the CAZ. It is intended that agreed modifications will be referenced in the Statement of Common Ground between the two parties. These modifications, where they are considered

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								<p>It is noted that the proposed site allocation previously formed part of the wider SIL designation as identified in the London Plan. However, the site has commitments that will change its fundamental use. The draft policy states (and requires) –</p> <p>“Whilst replacement provision of SIL land will be made at the Bermondsey Dive Under site, development should be demonstrably employment-led to ensure the long-term viability of commercial uses at the site and wider SIL area. Further details on calculating industrial capacity are set out in with Policy EC6 (Locally Significant Industrial Sites).”</p> <p>The respondent has not provided evidence that challenges the proposed change to LSIS status. Arguably the Borough Council’s proposal will result in a higher density/ intensity employment use. It also has the potential to secure other benefits. This would be in accordance with London Plan Policy E7.</p> <p>It is arguable that the nature and quality of this site provides no qualitative improvement to the land being promoted at the Bermondsey Dive Under (see below). Given its planning history and the known developer intentions it is unreasonable to assume that the site could return to its former SIL designation.</p>	necessary will be introduced at an appropriate point in the examination process.
CON124	REP602	GLA			3	LNA SA 06	LBL propose to downgrade this area of currently designated SIL to LSIS. It is suggested that SIL reprovision will be made at Bermondsey Dive Under site. As discussed elsewhere there is currently insufficient evidence to demonstrate that the BDU site is capable of delivering functional and suitable SIL replacement capacity. This is considered essential to facilitate the proposed change of designation from SIL to LSIS in this proposed allocation to bring about co-location of industrial and non-industrial uses on this site. There is an existing waste use on this site which is noted at paragraph 15.51. To be consistent with Policy SI 9 of the LP2021, development proposals that would result in the loss of this site would need to provide compensatory waste capacity elsewhere that must	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 06.</p> <p>The Council seeks to clarify that the new Local Plan is not seeking to downgrade any employment land. It is instead seeking a re-allocation of the designated employment land from SIL to LSIS, so that a different and more suitable range of employment uses can take place on these sites whilst allowing the sites to be</p>	The Council will identify opportunities to introduce modifications to site allocations, planning policy and supporting text that encourage industrial intensification, where it is possible, and warehousing and just in time service provision, where it supports the CAZ. It is intended that agreed modifications will be referenced in the Statement of Common Ground between the two parties. These modifications,

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							be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost. This should be made clear in the allocation. However, it is noted that Paragraph 15.51 makes reference to LP2021 Policy SI 9 which is welcome.	<p>intensified through co-location with residential uses.</p> <p>It is noted that the proposed site allocation previously formed part of the wider SIL designation as identified in the London Plan. However, the site has commitments that will change its fundamental use. The draft policy states (and requires) –</p> <p>“Whilst replacement provision of SIL land will be made at the Bermondsey Dive Under site, development should be demonstrably employment-led to ensure the long-term viability of commercial uses at the site and wider SIL area. Further details on calculating industrial capacity are set out in with Policy EC6 (Locally Significant Industrial Sites).”</p> <p>The respondent has not provided evidence that challenges the proposed change to LSIS status. Arguably the Borough Council’s proposal will result in a higher density/ intensity employment use. It also has the potential to secure other benefits. This would be in accordance with London Plan Policy E7.</p> <p>It is arguable that the nature and quality of this site provides no qualitative improvement to the land being promoted at the Bermondsey Dive Under (see below). Given its planning history and the known developer intentions it is unreasonable to assume that the site could return to its former SIL designation.</p>	where they are considered necessary will be introduced at an appropriate point in the examination process.
CON124	REP603	GLA			3	LNA SA 08	The proposed allocation is to designate the site as part LSIS and part SIL and to provide for the SIL capacity downgraded at Trundleys Road, Apollo Business Centre and Evelyn Court. The allocation proposes 5,264sqm of employment floorspace to be split between SIL and LSIS. The allocation does not quantify how much SIL capacity alone can realistically be provided at the site and therefore it is not clearly established that the allocation is able to completely offset the proposed downgrading of SIL at the other sites. The site is constrained by existing rail infrastructure making access for larger vehicles difficult and the site allocation should demonstrate that the	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 08.</p> <p>The Council notes that the respondent referred to this proposed site allocation as part of their Reg 18 representation. Within that representation they stated their belief that the site has a variety of development constraints that could not be overcome without the site actively promoting what</p>	The Council will also prepare additional supporting evidence that demonstrates the deliverability and developability of the BDU site to deliver a mix of new SIL and LSIS provision.

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							<p>site is capable of providing operational and functional SIL capacity. The proposed allocation should demonstrate that plans to accommodate SIL type industrial activities on the site are realistic and viable. As currently drafted neither of these issues have been addressed.</p> <p>The BDU site is complex and access to the site is made difficult for large vehicles as a result of a number of low railway bridges. It is very likely that investment would be required to address access issues and these have not been investigated or evidenced. Without more detailed information about these issues or about the need requirements that must be met it is uncertain whether the site can realistically accommodate (sufficient) suitable and functional SIL replacement capacity.</p>	<p>could be delivered in terms of high-quality industrial land. Nevertheless, the proposal to allocate the site was positively received by the respondent at that stage. The consequential action for the Council, from the Reg 18 consultation, was to allocate the site.</p> <p>The Council highlights that the new Local Plan is not seeking to downgrade any employment land. It is instead seeking a re-allocation of the designated employment land from SIL to LSIS, so that a different and more suitable range of employment uses can take place on these sites whilst allowing the sites to be intensified through co-location with residential uses.</p> <p>The proposed site allocation seeks to extend the land designated as SIL under London Plan Policy E5. The proposed allocation seeks to make-good losses in SIL (as identified above).</p> <p>The site is bounded by north-south rail lines. It is accessible from Senegal Road to the south (by foot) and Silwood Road to north, in terms of vehicular road access. The respondent has suggested that the site is unsuitable for all possible forms of SIL-employment use; specifically strategic B8 warehousing/ distribution. The respondent has cited accessibility as being the primary constraint. This appears to be an opinion derived from desk-top work. The respondent has not supplied any factual evidence to support their position.</p> <p>It is noted that the proposed site allocation is of a similar typology to other SIL-sites located to its immediate southeast. Whilst some of these similar sites benefit from better road access, the proposed BDU site allocation is typical in size, format and access arrangement to most manufacturing and industrial sites located within the capital. Indeed, it can most</p>	

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								<p>reasonably be described as a typical rail arches employment site. As such its proximity to existing (and proposed) residential uses is not unusual, or necessarily a constraint to its use as SIL. Indeed, this type of colocation is encouraged by the London Plan.</p> <p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 08.</p> <p>The respondent's comments on the apparent complexity of the site allocation are noted. In response the Council notes that these comments are based on desk-top observations rather than being informed by either market signals or any form of technical assessment. It is also assumed that the respondent's initial comments are based on the unreasonable and unrealistic assumption that this individual site should have the capacity to meet all the operational requirements identified under London Plan Policy E4. The Council challenges this interpretation.</p>	
CON124	REP604	GLA			3	LNA SA 17	<p>The allocation proposes a masterplan approach for this site to ensure the effective colocation of industrial and non-industrial uses. The allocation proposes a no net loss approach towards the protection of industrial capacity which is welcomed. As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan. To be consistent with LP2021 Policy E7D it should be made clear in the allocation that reprovided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied. We note planning permission has been granted for residential mixed-use development on part of the site.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 17. The Council welcomes the broad statement of support for the Policy.</p> <p>However, the Council considers the suggestion that the new Local Plan Policy LNA SA 17 be amended to ensure that <i>re-provided, intensified industrial, storage and distribution uses are completed in advance of any residential component being completed</i> is unnecessarily restrictive and may hinder the deliverability of the site.</p> <p>For clarity, the Council highlights that the new Local Plan Policy LNA SA 17 requires landowners to work in partnership and in accordance with a masterplan, to ensure the appropriate co-ordination, phasing, and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). This allows</p>	No further action required in relation to the new Local Plan.

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								flexibility in how the site is delivered whilst ensuring that a range of uses is provided upon completion of the whole site. Lower Creekside already has planning consent for part of the site.	
CON124	REP605	GLA			3	LNA SA 18	The site is currently home to industrial uses such as warehousing and storage facilities. It is noted that planning permission has recently been granted for the reconfiguration of the Cockpit Arts Centre, a former office block which is now home to artist spaces. As the site is home to non-designated industrial uses LBL should follow the guidance in Policy E7C of the LP2021. This makes it clear that mixed-use or residential development proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes or it has been allocated in an adopted DPD, or industrial, storage or distribution floorspace is provided as part of mixed-use intensification. It is noted that the site is currently allocated as part of LBL's Site Allocations Local Plan (2013). As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 18.</p> <p>For clarity, the Council highlights that this site was originally identified as a site allocation for mixed use housing with business/employment in the adopted Site Allocations Local Plan (2013).</p> <p>Furthermore, the Council highlights that the policy wording already acknowledges that the maximum viable amount of employment floorspace must be re-provided, in line with Policy EC 08 (Non designated employment sites).</p>	No further action required in relation to the new Local Plan.
CON124	REP606	GLA			3	LEA SA 06	The site may currently be home to non-designated industrial uses and the proposal is for the introduction of residential uses. In light of this the proposed site allocation should follow the guidance set out in Policy E7C of the LP2021. This makes it clear that mixeduse or residential development proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes or industrial, storage or distribution floorspace is provided as part of mixed-use intensification. The proposal does provide for employment floorspace which is ambiguous. As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.	<p>The Council notes the comments made in relation to the new Local Plan Policy LEA SA 06 Southbrook Mews.</p> <p>For clarity, this is an existing employment site that is developed to single storey level. The new Local Plan Policy LEA SA 06 seeks to optimise the growth potential of the site allocation, which is itself located within a Growth Node. For further clarity, the policy seeks the reprovision of the existing employment floorspace offer – at the lower storeys – allowing for a modest scale of residential accommodation above. The nature and location of the site make this a realistic prospect. The Council considers this approach sound.</p>	No further action required in relation to the new Local Plan.
CON124	REP607	GLA			3	LSA3 Bell Green and Lower Sydenham Opportunity Area	We note at Policy LSA3 the proposed intention for a future Opportunity Area at Bell Green and Lower Sydenham as it would benefit from a potential future extension of the Bakerloo Line beyond Lewisham.	The Council notes the comments and welcomes the support made in relation to the new Local Plan Policy LSA3.	No further action required in relation to the new Local Plan.

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CON124	REP608	GLA			3	LSA SA 04	The allocation proposes a masterplan approach for this site to ensure the effective colocation of industrial and non-industrial uses. The allocation proposes a no net loss approach towards the protection of industrial capacity which is welcomed. As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan. To be consistent with LP2021 Policy E7D it should be made clear in the allocation that reprovided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied	<p>The Council notes the comments made in relation to the new Local Plan Policy LSA SA 04. The Council welcomes the broad statement of support for the Policy.</p> <p>However, the Council considers the suggestion that the new Local Plan Policy LSA SA 04 be amended to ensure that <i>re-provided, intensified industrial, storage and distribution uses are completed in advance of any residential component being completed</i> is unnecessarily restrictive and may hinder the deliverability of the site.</p> <p>For clarity, the Council highlights that the new Local Plan Policy LSA SA 04 requires landowners to work in partnership and in accordance with a masterplan, to ensure the appropriate co-ordination, phasing, and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). This allows flexibility in how the site is delivered whilst ensuring that a range of uses is provided upon completion of the whole site. Lower Creekside already has planning consent for part of the site.</p>	No further action required in relation to the new Local Plan.
CON124	REP609	GLA			3	LSA SA 06	The allocation proposes a masterplan approach for this site to ensure the effective colocation of industrial and non-industrial uses. The allocation proposes a no net loss approach towards the protection of industrial capacity which is welcomed. As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan. To be consistent with LP2021 Policy E7D it should be made clear in the allocation that reprovided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied.	<p>The Council notes the comments made in relation to the new Local Plan Policy LSA SA 06. The Council welcomes the broad statement of support for the Policy.</p> <p>However, the Council considers the suggestion that the new Local Plan Policy LSA SA 06 be amended to ensure that <i>re-provided, intensified industrial, storage and distribution uses are completed in advance of any residential component being completed</i> is unnecessarily restrictive and may hinder the deliverability of the site.</p> <p>For clarity, the Council highlights that the new Local Plan Policy LSA SA 06 requires landowners to work in partnership and in accordance with a masterplan, to ensure the appropriate co-ordination, phasing, and balance of uses across the site, in line with Policy DM3 (Masterplans and</p>	No further action required in relation to the new Local Plan.

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								comprehensive development). This allows flexibility in how the site is delivered whilst ensuring that a range of uses is provided upon completion of the whole site. Lower Creekside already has planning consent for part of the site.	
CON124	REP610	GLA			3	LSA SA 08	It is noted that the site is proposed to address identified need for Gypsy and Traveller Accommodation. The site may currently be home to non-designated industrial uses in which case LBL should note that the proposed allocation should follow the guidance set out in Policy E7C of the LP2021. This makes it clear that mixed-use or residential development proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes or industrial, storage or distribution floorspace is provided as part of mixed-use intensification.	<p>The Council notes the comments made in relation to the new Local Plan Policy LSA SA 08 Land at Pool Court.</p> <p>The Council acknowledges that at the time of the new Local Plan's preparation the site was still in use as a scaffolding yard. However, the use has now ceased, and the site remains vacant and unused.</p> <p>The Council suggests that given the need for new Gypsy and Traveller accommodation and the lack of supply of appropriate sites, the new Local Plan's approach to this matter is sound.</p>	No further action required in relation to the new Local Plan.
CON124	REP611	GLA			3	LWA SA 01	The site is currently home to industrial uses and planning permission has recently been granted for an increase in light industrial floorspace. It is noted that the allocation is for residential and employment use. The site is home to non-designated industrial uses. In light of this the allocation should take into account Policy E7C of the LP2021. This sets out that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. If you find you need this site as part of a wider strategy to meet your industrial needs, you should consider its allocation in order to provide industrial capacity should the extant planning permission lapse.	<p>The Council notes the comments made in relation to the new Local Plan Policy LWA SA 01 111-115 Endwell Road.</p> <p>The new Local Plan Policy LWA SA 01 identifies that the site is in mixed-use – this being comprised of a place of worship, a car service garage and a timber and building supplies merchant.</p> <p>The Council highlights that the new Local Plan Policy LWA SA 01 requires landowners to work in partnership and in accordance with a masterplan, to ensure the appropriate co-ordination, phasing, and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). This allows flexibility in how the site is delivered whilst ensuring that a range of uses is provided upon completion of the whole site.</p> <p>The Council also notes that the policy requires that the maximum viable amount of employment floorspace must be re-provided, in line with Policy EC8 (Non-designated employment sites).</p>	No further action required in relation to the new Local Plan.

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CON124	REP612	GLA			3	LWA SA 02	The proposed allocation is currently home to industrial uses and part of the site, at least, is considered to be a non-designated industrial site. It is noted that the allocation is for residential and employment use. The site is home to non-designated industrial uses. In light of this the allocation should take into account Policy E7C of the LP2021. This sets out that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. The site is currently allocated as part of LBL's Site Allocations Local Plan (2013). As part of a Planled coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.	<p>The Council notes the comments made in relation to the new Local Plan Policy LWA SA 02 6 Mantle Road.</p> <p>The new Local Plan Policy LWA SA 02 identifies that the site is in industrial use – skip hire. The policy clearly sets out the context for the site allocation – namely, that the site is located within a suburban local centre that will benefit from place-shaping. It clearly states the opportunity that the site provides for redevelopment and site intensification, along with the introduction of a wider range of uses that will provide a more optimal use of land. Development will also enable the introduction of positive frontages and public realm enhancements along Mantle Road to improve the townscape and station approach.</p>	No further action required in relation to the new Local Plan.
CON124	REP613	GLA			3	LWA SA 04	The site may currently be home to non-designated industrial uses and the proposal is for the introduction of residential and town centre uses. In light of this, LBL should note that if there are current non-designated industrial uses the proposed allocation should follow the guidance set out in Policy E7C of the LP2021. This sets out that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification. The site is currently allocated as part of LBL's Site Allocations Local Plan (2013). As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.	<p>The Council notes the comments made in relation to the new Local Plan Policy LWA SA 04 Land at Forest Hill Station west (Devonshire and Dartmouth Roads).</p> <p>The new Local Plan Policy LWA SA 04 clearly states that this town centre site is home to a car services business – namely, a private-hire taxi company. The policy sets out a requirement that future redevelopment proposals secure a comprehensive mixed-use redevelopment with compatible main town centre, commercial and residential uses. This will also include public realm enhancements to improve Forest Hill station approach and forecourt.</p> <p>The Council highlights that the new Local Plan Policy LWA SA 04 requires landowners to work in partnership and in accordance with a masterplan, to ensure the appropriate co-ordination, phasing, and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). This allows flexibility in how the site is delivered whilst</p>	No further action required in relation to the new Local Plan.

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								<p>ensuring that a range of uses is provided upon completion of the whole site.</p> <p>The Council also notes that the policy requires that the maximum viable amount of employment floorspace must be re-provided, in line with Policy EC8 (Non-designated employment sites).</p>	
CON124	REP614	GLA			3	LWA SA 05	<p>The site may currently be home to non-designated industrial uses and the proposal is for the introduction of residential and town centre uses. In light of this, LBL should note that if there are current non-designated industrial uses the proposed allocation should follow the guidance set out in Policy E7C of the LP2021. This sets out that mixed-use or residential proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or it has been allocated in an adopted Local Plan or industrial, storage or distribution floorspace is provided as part of mixed use intensification.</p> <p>The site is currently allocated as part of LBL's Site Allocations Local Plan (2013). As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LWA SA 05 Land at Forest Hill Station west (Devonshire and Dartmouth Roads).</p> <p>The new Local Plan Policy LWA SA 05 clearly states that this town centre site is already comprised of mix of uses. These include retail, health care (dentist), light industrial (skip hire), car services and a car park. The policy sets out a requirement that future redevelopment proposals secure a comprehensive mixed-use development with compatible, main town centre, commercial, community and residential uses. This will also include public realm enhancements to improve Forest Hill station approach and forecourt.</p> <p>The Council highlights that the new Local Plan Policy LWA SA 05 requires landowners to work in partnership and in accordance with a masterplan, to ensure the appropriate co-ordination, phasing, and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). This allows flexibility in how the site is delivered whilst ensuring that a range of uses is provided upon completion of the whole site.</p> <p>The Council also notes that the policy requires that the maximum viable amount of employment floorspace must be re-provided, in line with Policy EC8 (Non-designated employment sites).</p>	No further action required in relation to the new Local Plan.
CON124	REP615	GLA			3	LWA SA 06	<p>The allocation proposes a masterplan approach for this site to ensure the effective colocation of industrial and non-industrial uses. The allocation proposes a no net loss approach towards the protection of industrial capacity which is welcomed.</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy LWA SA 06 Perry Vale Locally Significant Industrial Site.</p>	The Council will identify opportunities to introduce modifications to site allocations, planning policy and supporting text

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							<p>To be consistent with LP2021 Policy E7D it should be made clear in the allocation that reprovided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied.</p> <p>The site is currently allocated as part of LBL's Site Allocations Local Plan (2013). As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.</p>	<p>The Council notes the comments made in relation to the London Plan Policy E7 D 2). This sets a demanding requirement for development proposals – namely, that the re-provision of new industrial uses is phased for completion in advance of any on-site residential uses being occupied. The respondent has not provided any evidence to demonstrate that this is a reasonable or realistic proposition. For that reason, the Council concludes that the respondent's proposed amendment is unnecessarily restrictive and may hinder the deliverability of the site.</p> <p>For clarity, the Council highlights that the new Local Plan Policy LWA SA 06 requires landowners to work in partnership and in accordance with a masterplan, to ensure the appropriate co-ordination, phasing, and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). This allows flexibility in how the site is delivered whilst ensuring that a range of uses is provided upon completion of the whole site.</p> <p>The Council also highlights that the Policy also requires that redevelopment must not result in a net loss of industrial capacity, or compromise the function of the employment location, in line with Policy EC6 (Locally Significant Industrial Sites).</p>	that encourage industrial intensification, where it is possible, and warehousing and just in time service provision, where it supports the CAZ. It is intended that agreed modifications will be referenced in the Statement of Common Ground between the two parties. These modifications, where they are considered necessary will be introduced at an appropriate point in the examination process.
CON124	REP616	GLA			3	LWA SA 07	<p>The allocation proposes a masterplan approach for this site to ensure the effective colocation of industrial and non-industrial uses. The allocation proposes a no net loss approach towards the protection of industrial capacity which is welcomed.</p> <p>To be consistent with LP2021 Policy E7D it should be made clear in the allocation that reprovided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied.</p> <p>The site is currently allocated as part of LBL's Site Allocations Local Plan (2013). As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy LWA SA 07 Clyde Vale Locally Significant Industrial Site.</p> <p>The Council notes the comments made in relation to the London Plan Policy E7 D 2). This sets a demanding requirement for development proposals – namely, that the re-provision of new industrial uses is phased for completion in advance of any on-site residential uses being occupied. The respondent has not provided any evidence to demonstrate that this is a</p>	The Council will identify opportunities to introduce modifications to site allocations, planning policy and supporting text that encourage industrial intensification, where it is possible, and warehousing and just in time service provision, where it supports the CAZ. It is intended that agreed modifications will be referenced in the Statement of Common Ground between the two parties. These modifications, where they are considered

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							of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.	<p>reasonable or realistic proposition. For that reason, the Council concludes that the respondent's proposed amendment is unnecessarily restrictive and may hinder the deliverability of the site.</p> <p>For clarity, the Council highlights that the new Local Plan Policy LWA SA 07 requires landowners to work in partnership and in accordance with a masterplan, to ensure the appropriate co-ordination, phasing, and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). This allows flexibility in how the site is delivered whilst ensuring that a range of uses is provided upon completion of the whole site.</p> <p>The Council also highlights that the Policy also requires that redevelopment must not result in a net loss of industrial capacity, or compromise the function of the employment location, in line with Policy EC6 (Locally Significant Industrial Sites).</p>	necessary will be introduced at an appropriate point in the examination process.
CON124	REP617	GLA			3	LWA SA 09	<p>The allocation proposes a masterplan approach for this site to ensure the effective colocation of industrial and non-industrial uses. The allocation proposes a no net loss approach towards the protection of industrial capacity which is welcomed.</p> <p>To be consistent with LP2021 Policy E7D it should be made clear in the allocation that reprovided intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied. The site is currently allocated as part of LBL's Site Allocations Local Plan (2013).</p> <p>As part of a Plan-led coordinated approach there is an opportunity for the allocation to include an element of industrial capacity, contributing towards meeting the borough's industrial needs over the life of the Plan.</p>	<p>The Council notes and welcomes the broad support offered in relation to the new Local Plan Policy LWA SA 09 Willow Way Locally Significant Industrial Site.</p> <p>The Council notes the comments made in relation to the London Plan Policy E7 D 2). This sets a demanding requirement for development proposals – namely, that the re-provision of new industrial uses is phased for completion in advance of any on-site residential uses being occupied. The respondent has not provided any evidence to demonstrate that this is a reasonable or realistic proposition. For that reason, the Council concludes that the respondent's proposed amendment is unnecessarily restrictive and may hinder the deliverability of the site.</p> <p>For clarity, the Council highlights that the new Local Plan Policy LWA SA 09 requires landowners to work in partnership and in accordance with a masterplan, to ensure</p>	The Council will identify opportunities to introduce modifications to site allocations, planning policy and supporting text that encourage industrial intensification, where it is possible, and warehousing and just in time service provision, where it supports the CAZ. It is intended that agreed modifications will be referenced in the Statement of Common Ground between the two parties. These modifications, where they are considered necessary will be introduced at an appropriate point in the examination process.

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								the appropriate co-ordination, phasing, and balance of uses across the site, in line with Policy DM3 (Masterplans and comprehensive development). This allows flexibility in how the site is delivered whilst ensuring that a range of uses is provided upon completion of the whole site.	
CON125	REP618	Historic England			2	OL 01	<p>London Borough of Lewisham – Regulation 19 Consultation on draft Local Plan Thank you for the opportunity to comment on the above consultation document and for the agreement of an extension to the deadline for responses. As the Government’s adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.</p> <p>Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). They focus in particular on whether the draft Plan makes sufficient provision for the conservation and enhancement of the historic environment in Lewisham through strategic policies (NPPF, para 20), whether the identified evidence base for the historic environment is relevant and up to date (para 31) and if it therefore sets out a positive strategy for its conservation and enjoyment (para 185).</p> <p>As with the previous consultation version of the draft Plan, we note and welcome the focus throughout on the importance of future growth being character-led, as well as the detail on heritage across a broad range of relevant policy areas. We also note and welcome the greater detail and clarity in relation to building heights and locations in this consultation version, together with other amendments to the text in various areas. We consider that as a result the draft Plan offers an effective framework for managing the effects of new development on the historic environment, and our comments on this iteration of the Plan are limited as a result.</p>	The Council notes and welcomes the general comments and support offered by Historic England made in relation to the Spatial Strategy and the framework that it provides for managing the effects of new development on the historic environment.	No further action required in relation to the new Local Plan.
CON125	REP619	Historic England			2	QD 04	<p>In relation to building heights, we welcome the definition of a tall building in the borough, together with maximum heights within identified tall building suitability zones as set out in policy QD4.</p> <p>While we note the text at para 5.33 that such maximum heights are not automatically acceptable within the entire zone, we consider that this should also be made clear within QD4 itself.</p>	<p>The Council welcomes Historic England’s support in relation to the new Local Plan Policy QD 04.</p> <p>The Council also notes the comments made in relation to the wording of new Local Plan Policy QD 04 C, which sets out how the approach to tall new buildings will be applied at different locations across the</p>	Consider amending the wording at Policy QD 04 C to reflect the supporting text - <i>Although maximum heights are provided for each for the Tall Building Suitability Zones, proposals will still be expected to include robust design justifications for the heights</i>

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								Borough. The Borough notes the suggestion that the policy may benefit from clarification. The Council acknowledges that this specific issue is addressed within the associated supporting text paragraph (Paragraph 5.33).	<i>proposed, including testing in key views.</i>
CON125	REP620	Historic England			2	EC 11	We note that paragraph 8.53 relating to local character in relation to the borough's town centres has been deleted. While this is indeed covered in part elsewhere in the draft Plan, we would suggest that a reference to conserving historic character within town centres either directly in policy EC11 or its supporting text would be useful, not least as these areas often have high potential for significant archaeology. This reference should also make clear that conservation area appraisals and/or management plans should be consulted on relevant proposals.	The Council notes the comments made in relation to the new Local Plan Policy EC 11 and its supporting text. The new Local Plan addresses heritage matters through general borough-wide policies that are set out under Chapter 6 Heritage. These are comprised of Policies HE1 Lewisham's historic environment, HE2 Designated Heritage Assets, and HE3 Non-Designated Heritage Assets. Although these do not explicitly address the conservation of historic character within town centres, they do provide a sound borough-wide approach. Nevertheless, the Council could consider addressing the respondent's comments through modifications to the supporting text – potentially cross-referencing to Chapter 6 Heritage.	Consider modifications to the supporting text that refer to the requirements set out under the policies contained in Chapter 6 Heritage.
CON125	REP621	Historic England			2	SD 02	We note the reference to retrofitting measures to existing buildings in policy SD2 and supporting text at paragraph 11.11. We consider it would also be useful to make clear at either point that historic buildings may often need bespoke or non-standard interventions to reduce energy consumption and carbon emissions, as well as signposting current Historic England guidance. I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment. In the meantime, please do not hesitate to contact me should you require any further information.	The Council notes the comments made in relation to the new Local Plan Policy SD 2 D-G and its supporting text. The Council acknowledges that designated heritage assets/ listed buildings may need bespoke or non-standard interventions to reduce energy consumption and carbon emissions. The Council considers that this matter is sufficiently addressed through the policy supporting text at Paragraph 11.11.	No further action required in relation to the new Local Plan.
CON156	REP663	Sport England			2	Policy CI 03	I have now had a chance to review the Reg 19 consultation document and am pleased to note that several of Sport England's previous comments have largely been taken into account. The fact that policy around protecting sports facilities is in line with the London Plan is welcomed. Sport England is	The Council notes and welcomes the broadly supportive comments made in relation to the new Local Plan Policy CI 03 Sports, recreation, and play.	The Council agrees to prepare and produce an agreed position through a statement of common ground with Sport England. This

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							<p>also pleased to note the inclusion of a reference to its Active Design guidance.</p> <p>An outstanding issue is that of Lewisham’s Playing Pitch strategy, which forms Lewisham’s evidence base for outdoor sport. It was adopted in 2019 and while there were initially a couple of Stage E meetings held in order to review the document and ensure it was kept up to date, I am not aware of any further meetings being held since early 2020. These meetings are essential in order to ensure that this document continues to form part of a robust and up to date evidence base for sport and I would again urge you to ensure that a stage E meeting is arranged as soon as possible – I can put you in touch with the relevant contacts for this.</p>	The Council notes and agrees with the related comments to the Playing Pitch Strategy. The Council remains committed to working positively with its infrastructure partners to ensure that the future needs of the Borough’s residents and communities are identified and met through the plan-making and decision-taking processes. The Council will seek to formally agree the position and process for reviewing the Lewisham Playing Pitch Strategy through a statement of common ground.	will be undertaken through the examination process.
CON156	REP664	Sports England			2	Policy GR 02	<p>In terms of site allocations, as previously, we would advise that the allocation of new sites for sports facilities should be identified through the use of a robust and up to date evidence base such as the Lewisham Playing Pitch Strategy. The NPPF advises that it is important to ensure that the right facilities are in the right place. It is also essential that where sites adjacent to playing fields are proposed to be redeveloped that the new use does not prejudice the use of the playing field (for example, due to ball strike).</p>	<p>The notes the comments made in relation to the new Local Plan Policy GR 02 Open Spaces; specifically in relation to securing new provision through the delivery of new development.</p> <p>The Council agrees that it is important that new open space provision is secured in the right places and by doing so provides a meaningful contribution to the existing open space infrastructure network. For clarity supporting text states –</p> <p>Paragraph 10.9 “<i>The Lewisham Open Spaces Assessment provides an overview of existing open space provision across the Borough and in neighbouring authorities. It includes an assessment of public access to these open spaces and identifies areas where there are deficiencies in access to certain types of provision. Whilst all development proposals should investigate and maximise opportunities to enhance open space this is particularly important in areas of deficiency. We will expect all development proposals to refer to and engage with the Open Spaces Assessment, or any subsequent update, through the design-led approach. Furthermore, proposals should refer the deficiency maps developed by Greenspace Information for Greater London (GiGL).</i>”</p>	No further action required in relation to the new Local Plan.

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								<p>The Council considers that this provides development industry partners with clear direction, in conjunction with the master planning and design led approach to address this matter.</p> <p>Further clarity is provided under the supporting text at</p> <p>Paragraph 10.10 <i>“New development can help to enhance access to open space even where it is not feasible to deliver new public open space on site. Through the design-led approach development proposals should seek to deliver public realm enhancements to create new routes or improve connections to existing or planned new open spaces, particularly in areas of deficiency. Planning contributions towards open space provision may be sought, particularly where development is likely to generate additional demands on existing provision such through the introduction of more residential units and households. Contributions may include measures that support public access to open space along with the functional quality and amenity value of it.”</i></p>	
CON156	REP665	Sport England			3	LNA SA 09	<p>Surrey Canal Triangle Mixed-use Employment Location</p> <p>As stated previously, Sport England would expect that existing sports facilities and playing field on this site are reprovided to a satisfactory standard; this includes any meanwhile uses. Provision of sports on this site should also be informed by Lewisham’s evidence base for sport.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 09 Surrey Canal Triangle Mixed-use Employment Location.</p> <p>The Council considers that the policy clearly sets out the opportunities available across the site and the requirements that new development will meet. For this reason, the Council considers the policy sound.</p>	No further action required in relation to the new Local Plan.
CON156	REP666	Sport England			3	Policy LNA 13	<p>PLACE/Ladywell (Former Ladywell Leisure Centre)</p> <p>As stated previously, clarification is required as to how the loss of this leisure centre is in compliance with paragraph 99 of the NPPF. Sport England will object to this site allocation should satisfactory clarification not be provided.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA 13 PLACE/Ladywell (former Ladywell Leisure Centre).</p> <p>For clarity, the site is the location of the former Ladywell Leisure Centre. The historic leisure centre use vacated the site between eight to ten years ago. The</p>	No further action required in relation to the new Local Plan.

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								cleared site has subsequently been in use as a modular building integrating 24 residential units and workspace. This use is temporary and will expire during the plan period. The site allocation seeks the comprehensive redevelopment of the site. This is clearly set out under Paragraph 14.80. The historic leisure centre uses that were previously present on this site have been consolidated and consumed within other facilities within in proximity of the site. As the site allocation is not an existing open space or sports and recreation facility the requirement set out under national planning policy does not apply.	
CON156	REP667	Sport England			3	LCA SA 20	With regard to the site allocation involving the relocation of the South Circular, this will lead to a loss of playing field and it will need to be fully justified as to how this meets the NPPF/Sport England policy exceptions. Existing pitches and their runoffs will, at a minimum, need to be respected.	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA SA 20 South Circular.</p> <p>The Council acknowledges Sport England's concern on this matter but disagrees with their pessimistic conclusion. As part of the plan-making process the Council has undertaken a full technical assessment of the Borough's Metropolitan Open Land, which has concluded that there are very special circumstances that merit the limited release of land in order to secure the transport improvements brought by the realignment of the South Circular Road A205 at Catford. For clarity, the release will be limited to land required to secure the necessary improvements. Land not required will be consumed back into the Metropolitan Open Land designation. IT is anticipated that the land-take required to secure the improvements will be less than the indicative area identified in the new Local Plan. It is anticipated that the possible impacts on the existing pitch layouts/ configurations will be minimal.</p> <p>Furthermore, the Council understands that the private landowner, who has made a related representation to the plan-making process, is seeking to comprehensively reconfigure the layout of pitch provision</p>	No further action required in relation to the new Local Plan.

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								across the site. This potentially provides an opportunity to improve provision.	

**Local Plan Regulation 19 Consultation responses – via Commonplace
October 2023**

Introduction

The following table sets out the representations submitted to the Regulation 19 stage via the Commonplace platform. This is an online citizen engagement platform that seeks to secure improved engagement with communities - to collect their ideas and make better places. Commonplace seeks to empower effective plan-making and decision-taking in the planning and development of places and spaces across the United Kingdom. It is used by both plan-making authorities and their development industry partners. The Council has found the platform an effective and successful mechanism for engaging with residents and communities. It was used to provide an alternative access point for engagement with the new Local Plan.

The Council has reproduced the comments received via the Commonplace platform separately from others because they are reported in a different format. Nevertheless, the Council has considered the comments submitted via Commonplace in the same way as all other comments submitted to the plan-making process. All comments submitted to the plan-making process via Commonplace will be submitted to the Secretary of State as part of their examination of the new Lewisham Local Plan.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
CON126	REP622		Joseph Lyne		Policy TR 03	<p>What is your organisation? - Organisation n/a</p> <p>To which part of the Vision, Strategic Objectives and the Spatial Strategy chapter does your representation relate? (Representations must be made on a specific policy within the Vision, Strategic Objectives and the Spatial Strategy chapter. Please state the policy number and name in the box below) - Policy name/number TR3</p> <p>Do you consider that this part of the Vision, Strategic Objectives and the Spatial Strategy chapter is legally compliant: - Legally Compliant Yes</p> <p>Do you consider that this part of the Vision, Strategic Objectives and the Spatial Strategy chapter is sound - Soundness Yes</p> <p>Do you consider that this part of the Vision, Strategic Objectives and the Spatial Strategy chapter is compliant with the Duty to Co-operate - Duty to Co-operate Yes</p>	The Council notes and welcomes the implied support for the new Local Plan Policy TR 03 Healthy streets as part of healthy neighbourhoods .	No further action required in relation to this representation.
CON126	REP623		Joseph Lyne			<p>To which part of the Lewisham West Area chapter does your representation relate? (Representations must be made on a specific policy within the Lewisham West Area chapter. Please state the policy number and name in the box below) - Policy name/number LWA1</p> <p>Do you consider that this part of the Lewisham West Area chapter is sound - Soundness Yes</p>	<p>The Council notes and welcomes the implied support for the new Local Plan Policy LWA 01 West Area place principles.</p> <p>West Area place principles</p>	No further action required in relation to this representation.

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						<p>Do you consider that this part of the High Quality Design chapter is compliant with the Duty to Co-operate - Duty to Co-operate</p> <p>Yes</p>		
CON127	REP624 a, b and c		Ian Gidley		<p>Policy GR 02</p> <p>Figure 10.2</p> <p>Schedule 7</p>	<p>What is your organisation? - Organisation Land & Planning Consultants Ltd</p> <p>To which part of the Appendices and Schedules chapter does you representation relate? (Representations must be made on a specific policy within the Delivery and Monitoring chapter. Please state the policy number and name in the box below) - Policy name/number Schedule 7: Designated Open Space</p> <p>Do you consider that this part of the Appendices and Schedules chapter is legally compliant - Yes /No No</p> <p>Do you consider that this part of the Appendices and Schedules chapter is sound - Yes / No No</p> <p>Please give details of why you consider this part of the Appendices and Schedules chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments It is considered that designation of private land at Duncombe Hill/Brockley Rise as designated open space is unsound and might also be unlawful. There is an absence of any evidence or justification for its designation and the recent Open Space Review does not address this as lacks a qualitative assessment. Seems to be a political decision and not based on any sound town planning judgement. The land is privately owned and fenced. Accordingly, it cannot be used by the public and is not used for recreation or other use of value and this will be the case in perpetuity unless developed. It is not laid out or managed as formal open space or amenity space and does not possess the essential attributes or minimum quality to justify designation within an adopted Local Plan. Designation ignores a recent appeal decision which</p>	<p>The Council notes the comments made in relation to the new Local Plan in respect of the designated Local Green Space, which is protected through Policy GR 02, identified under Figure 10.2, and listed under Schedule 7.</p> <p>For clarity, the Local Green Space was designated through the Crofton Park and Honor Oak Park (HopCroft Plan) 2017-2027. Within that process the site was designated as Duncombe Hill Green. The HopCroft neighbourhood Plan was subject to a statutory process, which included opportunities for those with an interest to participate and inform the process. The Council can demonstrate that the neighbourhood plan-making process was legally compliant and that those with an interest had reasonable opportunities to participate.</p> <p>Furthermore, the HopCroft Plan-making process included a period of legal challenge, during which its lawfulness could have been independently assessed. The Council notes that the passed with the legality of the HopCroft going unchallenged.</p> <p>For clarity although Duncombe Hill Green may be in private ownership the opportunities for alternative uses are limited. The Council highlights that the Green's treescape is subject to protection under a group Tree Preservation Order.</p>	No further action required in relation to this representation.

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						<p>has a legal status and confirmed that the land is not open space. The Inspector opined: "I conclude that the appeal site is not an open space of public value. Consequently, I find that the appeal site is not an existing open space as defined by the Framework." We have repeatedly subsequently requested that it be removed as designated open space and removed from open space studies but again this has been ignored and it was illegally included in the neighbourhood plan which is subject to an official complaint and referral to the Local Government Ombudsman.</p> <p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible</p> <p>Remove land bounded by Duncombe Hill/Brockley Rise as a designated open space and removal from policies map as a strategic open space. 4</p> <p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Yes / No Yes</p> <p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: - Please explain below To present evidence.</p>	<p>For further clarity, the Council highlights that the references to an Inspector's decision relate to an unsuccessful appeal (to redevelop the site), that dates from a period prior to its designation as Local Green Space. It is noted that the Duncombe Hill Green's Local Green Space designation provides the site with the same status as Metropolitan Open Land.</p> <p>For the above reasons the Council concludes that the approach set out in the new Local Plan is sound.</p>	
CON127	REP625		Ian Gidley		Proposals Map	<p>To which part of the Proposed Policies Map does your representation relate? (Representations must be made on a specific policy within the Delivery and Monitoring chapter. Please state the policy number and name in the box below) - Policy name/number REGULATION 19 POLICIES MAP BOROUGH WIDE</p> <p>Please give details of why you consider this part of the Proposed Policies Map is not legally compliant, is</p>	<p>The Council notes the comments made in relation to the new Local Plan Proposals Map; specifically in respect of the designated Local Green Space at Duncombe Hill Green.</p> <p>For clarity, the Local Green Space was designated through the Crofton Park and Honor Oak Park (HopCroft Plan)</p>	No further action required in relation to this representation.

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						<p>unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments</p> <p>It is considered that the Proposed Policies Map is barely legible, missing street names and not based on a proper OS base. This needs to be addressed. Land at Duncombe Hill/Brockley Rise must be removed for the same reasons as per our objection to Schedule 7: Designated Open Space. It is neither a strategic open space or formal amenity green space or open space of any description.</p> <p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible</p> <p>Removal of land at Duncombe Hill/Brockley Rise as strategic (or any kind) open space.</p> <p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Yes / No Yes</p> <p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: - Please explain below To present evidence.</p>	<p>2017-2027. Within that process the site was designated as Duncombe Hill Green. The HopCroft neighbourhood Plan was subject to a statutory process, which included opportunities for those with an interest to participate and inform the process. The HopCroft Neighbourhood Plan clearly identifies the designated Local Green Space. The HopCroft Neighbourhood Plan was made on 6 May 2022. It forms part of the Development Plan for Lewisham.</p> <p>The comments made in relation to the proposals map are noted. For clarity, the new Local Plan proposals has produced from an OS Map base – albeit that this is not a regulatory requirement nor a test of soundness. The Council acknowledges that the proposals map has been published with compromises – this is normal and typical of current plan-making. Nevertheless, the designations and their associated schedules are clear. Furthermore, the Council highlights that upon adoption the new Local Plan Proposals Map will become interactive and will consequently have significantly greater levels of accessibility. This is considered reasonable given the weight that will be applied to the policies during decision.</p> <p>Finally for clarity, the Council highlights that Duncombe Hill Green’s status as a designated Local Green Space is entirely visible to decision-takers.</p>	
CON128	REP626		Mark Christopher Wood		Policy EC 12	<p><i>What is your organisation? - Organisation MWA</i></p> <p><i>To which part of the Economy and Culture chapter does your representation relate? (Representations must be made on a specific policy within the Housing chapter.</i></p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 12 Town centre network and hierarchy. The Council notes and welcomes the respondent’s acknowledgement that the Duty to Co-</p>	<p>No further action required in relation to this representation.</p>

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>Please state the policy number and name in the box below) - Policy name/number Town Centre Network and Hierarchy / EC12</p> <p>Do you consider that this part of the Economy and Culture chapter is legally compliant: - legally compliant No</p> <p>Do you consider that this part of the Economy and Culture chapter is sound - sound No</p> <p>Do you consider that this part of the Economy and Culture chapter is compliant with the Duty to Co-operate - Duty to Co-operate Yes</p> <p>Please give details of why you consider this part of the Economy and Culture chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments Criterion Ea. makes reference for main town centre uses in edge and out of centre locations to demonstrate via a RIA that there is an identified need and market demand for the amount and type of floorspace proposed. This requirement is not consistent with the NPPF (2021) which does not require an applicant to demonstrate a need (whether quantitative or qualitative) nor demonstrate market demand. Thus this is not sound or legally compliant in so far as it is inconsistent with national policy.</p> <p>Criterion F refers to 'major' Use Class E(a) retail. However the definition of 'major' is not defined. The prioritising of sites within Lewisham and Catford within the site selection process is relevant only in so far as it involves a development whose catchment encompasses these centres.</p> <p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in</p>	<p>operate has been met in respect of this policy.</p> <p>The Council notes the comment made in respect of the requirements for Retail Impact Assessments and their role in managing proposals that could result in unsustainable patterns of development. This specifically relates to proposals in locations that could harm the Borough's town centres and result in equally harmful unsustainable travel patterns.</p> <p>The Council highlights that national planning policy is committed to protecting and enhancing the vitality of town centres. The Council notes that the NPPF Para 86 states that –</p> <p><i>“Planning policies should.... define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;”</i></p> <p>Furthermore, the Council notes that National Practice Guidance Paragraph: 015 Reference ID: 2b-015-20190722 states that –</p> <p><i>“The impact test only applies to proposals exceeding 2,500 square metres gross of floorspace* unless a different locally appropriate threshold is set by the local planning authority.”</i></p> <p>The Practice Guidance continues at Paragraph: 016 Reference ID: 2b-016-20190722 that –</p> <p><i>“The impact test may however be useful in determining whether</i></p>	

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						<p><i>respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible</i></p> <p><i>Delete criterion Ea. A definition of what constitutes 'major' retail development should be included within the policy.</i></p> <p><i>Criterion F should be amended as follows: Proposals for new major Use Class E(a) retail development should prioritise Lewisham and Catford Major Centres in the site selection process where these fall within the primary catchment area of the development before considering other appropriate locations, including District Centres</i></p> <p><i>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing</i></p> <p><i>No (I do not wish to participate in an examination hearing session)</i></p> <p><i>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: - Please explain below</i></p> <p><i>This matter can be dealt with without attending a hearing session.</i></p>	<p><i>proposals in certain locations would impact on existing, committed and planned public and private investment, or on the role of particular centres."</i></p> <p>For the above reasons the Council considers that the new Local Plan's approach is consistent with national practice guidance.</p> <p>The Council notes and discounts the comments made in respect of the definition of major development. For clarity, the new Local Plan provides a clear definition under Appendix 2: Glossary, which states –</p> <p><i>"For non-residential development it means additional floor space of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015."</i></p> <p>Finally, the Council highlights that Lewisham and Catford are, it is a fact, the Borough's Major Centres within the hierarchy. Consequently, it is entirely logical and reasonable that development industry partners take an intelligent iterative site selection process that prioritises these locations for new major Use Class E(a) retail development. The Council considers that is a logical and reasonable request that will positively inform decision-taking and ensure successful and sustainable place making. It is unclear why the respondent would not wish to share these objectives.</p>	
CON128	REP627		Mark Christopher Wood		Policy LSA 03	<p><i>To which part of the Lewisham South Area chapter does your representation relate? (Representations must be made on a specific policy within the Lewisham South</i></p>	<p>The Council notes the comments made in relation to new Local Plan Policy LSA 03 Bell Green and Lower Sydenham.</p>	<p>No further action required in relation to this representation.</p>

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						<p>Area chapter. Please state the policy number and name in the box below) - Policy name/number Bell Green and Lower Sydenham/ LSA3</p> <p>Do you consider that this part of the Lewisham South Area chapter is legally compliant: - Legally Compliant No</p> <p>Do you consider that this part of the High Quality Design chapter is sound - Soundness Yes</p> <p>Do you consider that this part of the Lewisham South Area chapter is compliant with the Duty to Co-operate - Duty to Co-operate Yes</p> <p>Please give details of why you consider this part of the Lewisham South Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments Policy LSA3 is predicated on the key spatial objectives for this part of the Borough. It supports the regeneration of the Bell Green Retail Park to create a residential led mixed-use area with a distinctive urban character. This also includes the Sainsbury's food store. However the policy is not considered to be sound because it is not considered to be a realistic prospect of this site being developed in the manner proposed and therefore the policy is not considered to be effective. No consultation has been undertaken with the owner of the retail park in advance of preparing the Reg 19 submission. 7</p> <p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to</p>	<p>The Council notes and welcomes the respondent's stated acknowledgement that the policy is sound (see tick box) and meets the Duty to Co-operate.</p> <p>The Council remains firmly committed to working positively with development industry partners to secure and deliver the growth necessary to support the Borough's residents and communities, and fundamentally to create successful and sustainable places.</p> <p>Throughout the preparation of the new Local Plan the Council has proactively sought to engage development industry partners. This is progressively evidenced through the Consultation Statements. In this case, the landowner has determined not to engage in the plan-making process. For clarity, the Council highlights that other development industry partners with interests in this policy have responded positively.</p> <p>Although the Council is determined to work positively with development industry partners and arrive at a consensus there are alternative approaches available, outside of the plan-making process, to deliver the policy objective. The Council notes the content under national planning practice guidance at Paragraph: 002 Reference ID: 2b-002-20190722.</p>	

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						<p>put forward your suggested revised wording of any policy or text. Please be as precise as possible</p> <p><i>Criterion c. should exclude from the policy the Bell Green Retail Park.</i></p> <p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing</p> <p><i>Yes (I do wish to participate in an examination hearing session)</i></p> <p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: - Please explain below</p> <p>The policy raises significant implications in terms of the future of the Bell Green Retail Park which is owned by the West Midlands Pension Fund. Not only does it give rise to uncertainty as to the future of the retail park which contains a large number of occupiers under a range of leases, but it could also inhibit further investment in the short to medium term. The position of the Fund in respect of this policy therefore needs to be explained in detail to the examining Inspector(s).</p>		
CON128	REP628		Mark Christopher Wood		Policy LSA SA 02	<p>To which part of the Proposed Policies Map does your representation relate? (Representations must be made on a specific policy within the Delivery and Monitoring chapter. Please state the policy number and name in the box below) - Policy name/number</p> <p>Bell Green and Lower Sydenham/ LSA3</p> <p>Please give details of why you consider this part of the Proposed Policies Map is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments</p> <p>For the reasons provided under Policy LSA3 it is not considered that the redevelopment of the Bell Green Retail Park in accordance with the draft policy is likely to occur within the plan period.</p>	<p>The Council notes the comments made in relation to new Local Plan Policy LSA SA 02.</p> <p>The Council remains firmly committed to working positively with development industry partners to secure and deliver the growth necessary to support the Borough's residents and communities, and fundamentally to create successful and sustainable places.</p> <p>Throughout the preparation of the new Local Plan the Council has proactively sought to engage development industry partners. This is progressively evidenced through the Consultation Statements. In this case, the landowner has determined not to engage in the plan-making process. For</p>	No further action required in relation to this representation.

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						<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible</p> <p>The Proposals Map should exclude the Bell Green Retail Park.</p> <p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Yes / No No</p> <p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: - Please explain below</p> <p>This matter can be delete with by a written statement. 8</p>	<p>clarity, the Council highlights that other development industry partners with interests in this policy have responded positively.</p> <p>Although the Council is determined to work positively with development industry partners and arrive at a consensus there are alternative approaches available, outside of the plan-making process, to deliver the policy objective. The Council notes the content under national planning practice guidance at Paragraph: 002 Reference ID: 2b-002-20190722.</p> <p>The Council highlights that the respondent has not provided any sound evidence that demonstrates that the site allocation will not come forward during the plan period.</p>	
CON129	REP629		Michael Atkins		Policy QD 07	<p>What is your organisation? - Organisation Port of London Authority</p> <p>To which part of the High Quality Design chapter does you representation relate? (Representations must be made on a specific policy within the High Quality Design chapter. Please state the policy number and name in the box below) - Policy number and name QD7: Amenity and Agent of Change.</p> <p>Do you consider that this part of the High Quality Design chapter is legally compliant: - Do you consider that this part of the High Quality Design chapter is legally compliant Yes</p> <p>Do you consider that this part of the High Quality Design chapter is sound - Do you consider that this part of the High Quality Design chapter is sound No</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 07 Amenity and agent of change.</p> <p>The Council notes the comments made in relation to the agent of change principle; specifically in terms of how the approach is applied to noise generating uses. The Council considers that this is matter is already addressed within the policy supporting text under Paragraph 5.52; which speaks to noise generating uses in their totality. For clarity, supporting text Paragraph 5.58 is focussed upon the potential for existing cultural and community venues, and their potential to generate noise. It would be inappropriate and unnecessary to expand this highly text to encompass all noise generating uses.</p>	No further action required in relation to this representation.

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						<p>Do you consider that this part of the High Quality Design chapter is compliant with the Duty to Co-operate - Do you consider that this part of the High Quality Design chapter is compliant with the duty to co-operate</p> <p>Yes</p> <p>Please give details of why you consider this part of the High Quality Design chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate.</p> <p>In principle support policy QD7, which states that development proposals must clearly demonstrate how noise and other nuisances will be mitigated and managed and must comply with the Agent of Change principle in accordance with the London Plan. However, it is considered that the supporting text at paragraph 5.58 must be expanded to include a specific reference that the Agent of Change principle should be applied to all noise-generating uses including industrial areas and safeguarded wharves, and that noise sensitive uses located in close proximity to such sites (including vacant wharves) must be designed to minimise the potential for conflicts of use and disturbance. This would ensure the policy in in line with regional and national policy including policies D12 (Agent of Change) and SI15 (Water Transport) of the London Plan, and paragraph 187 of the National Planning Policy Framework (NPPF). With regard to artificial lighting, welcome that this policy now makes clear that development proposals adjacent to the River Thames must ensure that artificial lighting will not have an adverse impact on river navigation, and also consider water habitats with regard to light spill</p> <p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible</p> <p>Proposed amendment to paragraph 5.58 is as follows: “Noise generating cultural and community venues (such</p>	<p>The Council considers that this matter appropriately addressed within existing supporting text, and fully within the London Plan, which is also cross referenced. The London Plan forms part of Lewisham’s wider Development Plan and there is no requirement to regurgitate it verbatim. The Council concludes that the policy is sound.</p>	

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						<p>as theatres, concert halls, pubs and live music venues), as well as other noise generating uses in Industrial Areas and Safeguarded Wharves should be protected for the benefit of the wider community and the local economy”</p> <p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing</p> <p>No (I do not wish to participate in an examination hearing session)</p>		
CON129	REP630 a and b		Michael Atkins		<p>Policy SD 09</p> <p>Figure 11.4</p>	<p>S To which part of the Sustainable Design & Infrastructure chapter does your representation relate? (Representations must be made on a specific policy within the Sustainable Design & Infrastructure chapter. Please state the policy number and name in the box below) - Policy name/number</p> <p>Policy SD9: Lewisham’s Waterways</p> <p>Do you consider that this part of the Sustainable Design & Infrastructure chapter is legally compliant: - legally compliant</p> <p>Yes</p> <p>Do you consider that this part of the Sustainable Design & Infrastructure chapter is sound - sound</p> <p>No</p> <p>Do you consider that this part of the Sustainable Design & Infrastructure chapter is compliant with the Duty to Co-operate - Duty to Co-operate</p> <p>Yes</p> <p>Please give details of why you consider this part of the Sustainable Design & Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments</p> <p>Support the amendments made to part E of the policy which states that the Council will continue to safeguard Convoys Wharf taking into account the Ministerial</p>	<p>The Council notes the comments and broad level of support offered in relation to the new Local Plan Policy SD 09 Lewisham’s Waterways.</p> <p>The Council has considered the suggestion that supporting text Paragraph 11.59 be amended to make more specific reference to the agent of change principle to ensure that new developments are designed to minimise the potential for conflicts of use and disturbance between residential and waterway activities. The Council concludes that it would be inappropriate to amend the specific supporting text as suggested.</p> <p>The Council notes and acknowledges the factual position in respect of the safeguarded status of Convoys Wharf. The Council highlights that the Section 106 legal agreement associated with the outline planning permission 13/08338 for Convoys Wharf includes Annex 1 sets out the uses and processes excluded from the wharf. These restrict the industrial uses that could be delivered on the Wharf in order to secure residential amenity for the proposed neighbouring residential uses. These restrictions primarily relate to waste processing and recycling uses.</p>	<p>Amend Figure 11.4 key to read –</p> <p><i>Confirmed Safeguarded Wharf Boundary</i></p>

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						<p>Safeguarding Direction for the wharf and extant planning consents, however in order to consistent with regional policy it is recommended that supporting paragraph is updated to directly refer to Convoys Wharf. Furthermore, the supporting text must include specific reference to the need for adjacent and nearby development proposals to be designed to minimise the potential for conflicts of use and disturbance, in line with the Agent of Change principle and London policy SI15, to ensure that the long term use and viability of the safeguarded wharf, which could operate over 24 hours a day in line with the tides is not constrained which could result in the wharf becoming unviable for waterborne freight cargo handling. In addition, the key for figure 11.4 (Safeguarded Wharf at Convoys Wharf) must be amended as to reflect the confirmation of the safeguarded wharf boundary as part of the 2021 Ministerial Direction.</p> <p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</p> <p>(Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible</p> <p>Recommended that supporting paragraph 11.59 is amended as follows: “There is a network of wharves, including Convoys Wharf, along the River Thames that are protected for use as a wharf for waterborne freight cargo handling by a safeguarding Direction issued by the Secretary of State on 1st March 2021”. Proposed wording with regard to Agent of Change principle for the supporting text to SD9: “Development proposals located in close proximity to the safeguarded Convoys Wharf must be designed to take into account potential future wharf operations, which can take place over 24 hours a day in line with tidal movements, in accordance with the Agent of Change Principle and London Plan policy SI15” The key to figure 11.4 (Safeguarded Wharf at Convoys</p>	<p>They are specified under the Section 106 Agreements Annex 1 (Page 214). The Council considers that limits the full potential of the agent of change principle. For this reason, the Council considers it inappropriate to amend the supporting text.</p>	

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>Wharf) must be amended as follows: “Confirmed Safeguarded Wharf Boundary ”</p> <p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing</p> <p>No (I do not wish to participate in an examination hearing session)</p>		
CON129	REP631 a, b and c		Michael Atkins		<p>Policy LNA SA 01</p> <p>Policy LNA SA 02</p> <p>Figure 15.2</p>	<p>To which part of the Lewisham North Area chapter does your representation relate? (Representations must be made on a specific policy within the Lewisham's North Area chapter. Please state the policy number and name in the box below) - Policy name/number</p> <p>Key Spatial Principles / Site Allocation 1: Convoys Wharf Mixed-Use Employment Location / Site Allocation 2 Deptford Landings Mixed-Use Employment Location (formerly known as Oxestalls Road) and Scott House.</p> <p>Do you consider that this part of the Lewisham North Area chapter is legally compliant: - legally compliant</p> <p>Yes</p> <p>Do you consider that this part of the Lewisham North Area chapter is sound - Soundness</p> <p>No</p> <p>Do you consider that this part of the Lewisham North Area chapter is compliant with the Duty to Co-operate - Duty to Co-operate</p> <p>Yes</p> <p>Please give details of why you consider this part of the Lewisham North Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments 11</p> <p>- Figure 15.2 (North Area key diagram) To ensure consistency with regional policy, figure 15.2 (North Area key diagram) must be updated to highlight the safeguarded wharf boundary for Convoys Wharf, and the</p>	<p>The Council notes and acknowledges the comments made in relation to the new Local Plan Policies LNA SA 01 and SA 02.</p> <p>The Council has considered the suggestion that supporting text Paragraph 11.59 be amended to make more specific reference to the agent of change principle to ensure that new developments are designed to minimise the potential for conflicts of use and disturbance between residential and waterway activities. The Council concludes that it would be inappropriate to amend the specific supporting text as suggested.</p> <p>The Council notes and acknowledges the factual position in respect of the safeguarded status of Convoys Wharf. The Council highlights that the Section 106 legal agreement associated with the outline planning permission 13/08338 for Convoys Wharf includes Annex 1 sets out the uses and processes excluded from the wharf. These restrict the industrial uses that could be delivered on the Wharf in order to secure residential amenity for the proposed neighbouring residential uses. These restrictions primarily relate to waste processing and recycling uses. They are specified under the Section 106 Agreements Annex 1 (Page 214).</p>	<p>The Council to consider the benefits and mapping practicalities of identifying the Confirmed Safeguarded Wharf Boundary again under Figure 15.2.</p>

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>proposed riverbus stop at Convoys wharf. - Key spatial objective 10: With regard to spatial objective 10 and the Thames Path. Whilst the PLA in principle supports the aim to enhance public access to the river, including by repairing breaks in the Thames Path. It must be recognised how in some cases there can be challenges in finding the best route near operational wharves and industrial areas, and that this will require a pragmatic solution to achieving appropriate, safe access around these sites. An amendment is therefore proposed to key spatial objective 10 - Site Allocation 1: Convoys Wharf Mixed-Use Employment Location. PLA consider that the development guidelines section must be amended to state that as part of the proposed development and forthcoming Reserved Matters applications, the proposed residential development located in close proximity to the Safeguarded Wharf must be designed to minimise the potential for conflicts of use and disturbance, including by utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, as well as implement any required mitigation measures in line with the Agent of Change principle to ensure future residents are protected, and that future wharf operators can operate without risk of nuisance complaint. This would be consistent with regional policy in the London Plan (SI15) and would also be in line with other Local Plan site allocations include sites 18 and 19 which do recognise this issue. - Site 2: Deptford Landings Mixed-Use Employment Location (formerly known as Oxestalls Road) and Scott House. As with allocation 1 in order to ensure consistency with the London Plan the development guidelines section must be also be amended here to state that as part of the proposed residential development located in close proximity to the Safeguarded Wharf, this must be designed to minimise the potential for conflicts of use and disturbance, including by utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, and implement any required mitigation measures in line with the Agent of Change principle.</p> <p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness</p>	<p>The Council considers that limits the full potential of the agent of change principle. For this reason, the Council considers it inappropriate to amend the supporting text.</p> <p>The Council will consider the suggestion to amend Figure 15.2 to identify the Confirmed Safeguarded Wharf Boundary – albeit that this may not be necessary for purposes of soundness as the Boundary is clearly defined elsewhere within the new Local Plan (figure 11.4).</p>	

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>matters you have identified above - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible</p> <p>- Figure 15.2 (North Area key diagram): Must be updated to include the safeguarded wharf boundary and the proposed riverbus stop at Convoys wharf. - Key spatial objective 10 proposed amendment: "Maximise the recreational and amenity value of the River Thames and Deptford Creekside by transforming the riverside area into a vibrant neighbourhood and visitor destination. Secure Creekside's continued role in accommodating boating communities, including boat dwellings. Enhance public access to the river, including by repairing breaks in the Thames Path and Waterlink Way where appropriate and safe to do so, as well as enabling river bus services at Convoys Wharf." - Site Allocation 1: Convoys Wharf Mixed-Use Employment Location proposed addition to the development guidelines section: "The proposed residential development located in close proximity to the safeguarded Convoys Wharf must be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, and implementing appropriate mitigation measures if required in line with the Agent of Change principle." - Site 2: Deptford Landings Mixed-Use Employment Location (formerly known as Oxestalls Road) and Scott House proposed addition to the development guidelines section: "The proposed residential development located in close proximity to the safeguarded Convoys Wharf must be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, and implementing appropriate mitigation measures if required in line with the Agent of Change principle."</p> <p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in</p>		

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>examination hearing session(s)? - Participate in examination hearing</p> <p>No (I do not wish to participate in an examination hearing session) 13</p>		
CON130	REP632 a and b		Lena		<p>Legal compliance – public con- sultation</p> <p>Policy LCA SA 10</p>	<p>To which part of the Lewisham Central Area chapter does your representation relate? (Representations must be made on a specific policy or site allocation within the Lewisham Central Area chapter. Please state the policy number and name in the box below) - Policy name/number</p> <p>House on the Hill and Slaithwaite Road</p> <p>Do you consider that this part of the Lewisham Central Area chapter is legally compliant: - Legally Compliant</p> <p>Yes</p> <p>Do you consider that this part of the Lewisham Central Area chapter is sound - Soundness</p> <p>No</p> <p>Do you consider that this part of the Lewisham Central Area chapter is compliant with the Duty to Co-operate - Duty to Co-operate</p> <p>No</p> <p>Please give details of why you consider this part of the Lewisham Central Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments</p> <p>Duty to Cooperate - I am a local resident, and do not feel that information on the council's plans around House on the Hill at Slaithwaite Road was adequately provided to myself and my neighbours (living on Slaithwaite Road and Clarendon Rise. We were not provided clear and transparent information or the opportunity to feed in our thoughts and concerns. Most of us are not in the habit of repeatedly checking the Lewisham council website to check for local planning updates, so it would not occur to us to seek out information on House on the Hill. A small white piece of paper informing us of the consultation was posted outside the property, but for most local residents</p>	<p>The Council notes the comments made in relation to the new Local Plan – specifically in terms of the public consultation, and its inter-relationship with Policy LCA SA 10 House on the Hill at Slaithwaite Road.</p> <p>The Council remains committed to ensuring that the Borough's residents and communities have access to the plan-making and decision-taking processes. The Council's Statement of Community Involvement sets out how those with an interest in plan-making and decision-taking will be involved in these processes.</p> <p>It is noted that the respondent perceives that residents were not properly consulted. The Council disputes this perception. The new Local Plan has been subject to three statutory consultation stages, all of which have witnessed positive engagement with residents and communities. The extent and nature of engagement is evidenced through the Consultation Statements for the individual stages of the process.</p> <p>In terms of managing the potential impacts of new development, to ensure that it delivers successful and sustainable places, the Council considers that the new Local Plan through its spatial strategy, site allocations and planning policies provides an appropriate framework for decision-takers. The Council considers that this is particularly so in relation to</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>(including myself), this would not have been noticed. It would have been much better to send local residents information through the post to keep us looped in on consultations etc. As such, most of us were unable to get to the stage of feeding in views and concerns within the consultation window. It was only through word of mouth, at the last minute, that I found out about this consultation. The opinion of local residents matters, because we are best placed to inform the council on idiosyncrasies of and issues within the local area that need to be borne in mind.</p> <p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible</p> <p>It will be necessary to ensure that, following the construction of a new residential building, traffic does not increase materially, nor car pollution or noise pollution. Moreover, provisions must be made to ensure that access to local services (such as doctors, dentists, nurseries, etc.) are not further constrained by greater demand not being met by greater supply. Finally, the construction should not be too high, to preserve adequate sunlight reaching neighbouring properties.</p> <p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing</p> <p>No (I do not wish to participate in an examination hearing session)</p>	managing the possible impacts of growth upon the Borough's visual character and appearance. Equally, the approach to securing investment in infrastructure networks will ensure that new development is successfully integrated across the Borough.	
CON131	REP633		Jonathan Sharif		Legal Compliance – public consultation	<p>To which part of the Housing chapter does your representation relate? (Representations must be made on a specific policy within the Housing chapter. Please state the policy number and name in the box below) - Policy name / number</p> <p>H01</p>	The Council notes the comments made in relation to the new Local Plan – specifically in respect of the public consultation and engagement undertaken to inform the process.	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>Do you consider that this part of the Housing chapter is legally compliant: - Legally compliant No</p> <p>Do you consider that this part of the Housing chapter is sound - sound No</p> <p>Do you consider that this part of the Housing chapter is compliant with the Duty to Co-operate - Duty to co-operate No</p> <p>Please give details of why you consider this part of the Housing chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments Local neighbouring residents who will be directly effected by the proposed housing developments have not been properly consulted regarding the impact of new housing next door to their existing long-term dwellings. The implications of this include; anti-social behaviour, pollution and criminality, amongst various other issues.</p> <p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible Local neighbouring residents should be consulted and remedies agreed before developments start.</p> <p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: - Please explain below Yes, I would like to participate in the hearing sessions in order that the voices and opinions of local neighbouring</p>	<p>The Council remains committed to ensuring that the Borough's residents and communities have access to the plan-making and decision-taking processes. The Council's Statement of Community Involvement sets out how those with an interest in plan-making and decision-taking will involved in these processes.</p> <p>It is noted that the respondent perceives that residents were not properly consulted. The Council disputes this perception. The new Local Plan has been subject to three statutory consultation stages, all of which have witnessed positive engagement with residents and communities. The extent and nature of engagement is evidenced through the Consultation Statements for the individual stages of the process.</p> <p>The possible impacts of the new Local Plan, and specifically of the scale of growth, is the subject of progressive statutory assessment through the Integrated Impact Assessments and Habitat Regulation Assessment. These documents have also been the subject of consultation.</p>	

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						residents to these developments are heard and properly considered. 21		
CON132	REP634		Tom Clarke MRTPI		Policy QD 07	<p>What is your organisation? - Organisation Theatres Trust</p> <p>To which part of the High Quality Design chapter does you representation relate? (Representations must be made on a specific policy within the High Quality Design chapter. Please state the policy number and name in the box below) - Policy number and name QD7 Amenity and agent of change</p> <p>Do you consider that this part of the High Quality Design chapter is legally compliant: - Do you consider that this part of the High Quality Design chapter is legally compliant Yes</p> <p>Do you consider that this part of the High Quality Design chapter is sound - Do you consider that this part of the High Quality Design chapter is sound Yes</p> <p>Do you consider that this part of the High Quality Design chapter is compliant with the Duty to Co-operate - Do you consider that this part of the High Quality Design chapter is compliant with the duty to co-operate Yes</p> <p>Please give details of why you consider this part of the High Quality Design chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - give details of why you consider this part of the High Quality Design chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. We remain supportive of this policy</p> <p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing No (I do not wish to participate in an examination hearing session)</p>	The Council notes and welcomes the continued support for the new Local Plan Policy QD 07 Amenity and agent of change.	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
CON132	REP635		Tom Clarke MRTPI	2	CI 01	<p>To which part of the Community Infrastructure chapter does your representation relate? (Representations must be made on a specific policy within the Community Infrastructure chapter. Please state the policy number and name in the box below) - Policy name/number CI1 Safeguarding and securing community infrastructure</p> <p>Do you consider that this part of the Community Infrastructure chapter is legally compliant: - legally compliant Yes</p> <p>Do you consider that this part of the Community Infrastructure chapter is sound - sound Yes 22</p> <p>Do you consider that this part of the Community Infrastructure chapter is compliant with the Duty to Co-operate - Duty to Co-operate Yes</p> <p>Please give details of why you consider this part of the Community Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments We remain supportive of this policy and its support and protection of valued facilities. We would however urge minor amendment to paragraph 9.1 so that cultural facilities are referenced as examples of community infrastructure covered by the policy, particularly as the site allocation for the Albany Theatre (Site 15) references the need to accord with this policy if re-provision is proposed.</p> <p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy CI 01 Safeguarding and securing community infrastructure.</p> <p>The Council considers that the suggested addition to the supporting policy text is helpful. The Council will consider making this amendment through the modification process.</p>	<p>Amend the new Local Plan Policy CI 01 Paragraph 9.1 to read –</p> <p>Paragraph 9.1 –</p> <p><i>“Community infrastructure is also commonly referred to as social infrastructure. It covers a range of services and facilities that contribute towards inclusive and sustainable neighbourhoods and communities by providing residents and visitors with opportunities to enjoy a good quality of life. Community infrastructure includes provision for health services, education and training, community facilities (including public houses), cultural facilities, places of faith, and sport and recreation facilities for people of all ages and abilities. Green infrastructure is also a component of social infrastructure, although it is addressed separately in this Local Plan.”</i></p>

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible</p> <p>Amend paragraph 9.1 to refer to cultural facilities.</p> <p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing</p> <p>No (I do not wish to participate in an examination hearing session)</p>		
CON132	REP636		Tom Clarke MRTPI	3	LCA 03	<p>To which part of the Lewisham Central Area chapter does your representation relate? (Representations must be made on a specific policy or site allocation within the Lewisham Central Area chapter. Please state the policy number and name in the box below) - Policy name/number</p> <p>LCA3 Catford major centre and surrounds</p> <p>Do you consider that this part of the Lewisham Central Area chapter is legally compliant: - Legally Compliant</p> <p>Yes</p> <p>Do you consider that this part of the Lewisham Central Area chapter is sound - Soundness</p> <p>Yes</p> <p>Do you consider that this part of the Lewisham Central Area chapter is compliant with the Duty to Co-operate - Duty to Co-operate</p> <p>Yes</p> <p>Please give details of why you consider this part of the Lewisham Central Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to 23</p> <p>support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments</p> <p>We continue to support this policy with regards to its support for the Broadway Theatre.</p>	<p>The Council notes and welcomes the continued support for the new Local Plan Policy LCA 03 Catford major centre and surrounds.</p> <p>Catford major centre and surrounds</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
CON132	REP637		Tom Clarke MRTPI		Policy LNA SA15	<p>To which part of the Lewisham North Area chapter does you representation relate? (Representations must be made on a specific policy within the Lewisham's North Area chapter. Please state the policy number and name in the box below) - Policy name/number 15 Albany Theatre</p> <p>Do you consider that this part of the Lewisham North Area chapter is legally compliant: - legally compliant Yes</p> <p>Do you consider that this part of the Lewisham North Area chapter is sound - Soundness No</p> <p>Do you consider that this part of the Lewisham North Area chapter is compliant with the Duty to Co-operate - Duty to Co-operate Yes</p> <p>Please give details of why you consider this part of the Lewisham North Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments Whilst the site allocation seeks retention of the Albany, we noted in our previous comments there is a need to protect the theatre (and ensure suitable living conditions for occupants) by protecting from future conflict with new residents. This applies whether the theatre remains in its current space or elsewhere at the site. We recommend the addition of text highlighting the need to consider the Agent of Change principle including for the theatre's access and servicing needs. Our recommendations were taken forward at Site Allocation 19 (Laurence House and Civic Centre) and they should similarly be integrated here to ensure development is sustainable and that suitable living standards can be achieved for future occupants.</p> <p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA15 Albany Theatre.</p> <p>The Council notes the suggestion that the policy supporting text be amended to include reference to the agent of change principle so that new development can secure the retention of the theatre uses without conflicting with the new on-site residential uses. The Council agrees that an appropriate amendment to the supporting text, that is consistent with wording elsewhere in the new Local Plan, be introduced as a modification.</p>	<p>Amend new Local Plan Policy LNA SA15 Paragraph 15.91 to include new text under new Point 2 –</p> <p><i>“Paragraph 15.91 2. Development should be designed to protect the amenity of residential properties, taking into account the theatre’s out of hours’ access and servicing needs, in line with the Agent of Change principle.”</i></p>

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>sound, in respect of any legal compliance or soundness matters you have identified above - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible</p> <p>Addition of text on protecting the theatre and its wider operational needs, such as: "Development should be designed to protect the amenity of residential properties, taking into account the theatre's out of hours' access and servicing needs, in line with the Agent of Change principle".</p> <p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing</p> <p>No (I do not wish to participate in an examination hearing session)</p>		
CON133	REP638 a and b		Bridget Fox		<p>Policy GR 1</p> <p>Policy GR 5</p>	<p>What is your organisation? - Organisation The Woodland Trust</p> <p>To which part of the Green Infrastructure chapter does your representation relate? (Representations must be made on a specific policy within the Green Infrastructure chapter. Please state the policy number and name in the box below) - Policy name/number GR1, GR3, GR5</p> <p>Do you consider that this part of the Green Infrastructure chapter is legally compliant: - legally compliant Yes</p> <p>Do you consider that this part of the Green Infrastructure chapter is sound - sound Yes</p> <p>Do you consider that this part of the Green Infrastructure chapter is compliant with the Duty to Co-operate - Co-operate Yes</p>	<p>The Council notes and welcomes the strong support provided for the new Local Plan Policy GR 1 Green infrastructure and Lewisham's Green Grid.</p> <p>The Council notes the suggestion that the policy be amended to include specific reference as to how proposals that could result in the loss of irreplaceable habitats will be considered. This is a matter that is clearly set out under national planning policy (NPPF Para 180) and it is normally necessary for local plans to regurgitate the content. However, as the Council remains committed to delivering green infrastructure enhancements, as a core component of successful place-shaping, a suitable addition to the policy can be considered.</p>	<p>Amend new Local Plan Policy GR 1 A to incorporate –</p> <p><i>"...Development proposals must protect and seek to enhance provision of green infrastructure across the Borough, including by improving or creating new links between its different elements. Development resulting in the loss of irreplaceable habitats (such as Ancient Woodland or veteran trees) will normally be refused unless there are demonstrable exceptional reasons and a suitable compensation strategy exists."</i></p>

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>Please give details of why you consider this part of the Green Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments</p> <p>GR1 The Woodland Trust welcomes this policy, in particular section B requiring "provision of sufficient space where large canopy trees can be retained and new trees established without pressure for their future removal." This is line with para 131 of the NPPF which recognises the value of trees and encourages policies for their long-term survival. GR3 The Woodland Trust supports this policy and welcomes the wording referring to the emerging requirement for Local Nature Recovery Strategies in section A, which will make this policy sounder for the long term. We would like to see the policy strengthened with explicit reference to protection of irreplaceable habitats in line with para 180c of the NPPF.</p> <p>GR5 The Woodland Trust strongly supports this policy, in particular section C on the Urban Greening Factor and sections E and F which provide for the protection of existing trees and the provision of additional trees, in line with para 131 of the NPPF.</p>	The Council notes and welcomes the strong support provided for the new Local Plan Policy GR 5 Urban greening and trees.	
CON133	REP639		Bridget Fox		Policy GR 03	<p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible</p> <p>GR3 We propose rewording para B as follows: change "They must also protect and conserve protected and priority habitats and species that sit outside of the SINC network," to read " They must also protect and conserve irreplaceable habitats, protected and priority habitats, and species that sit outside of the SINC network," to</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy GR 03 Biodiversity and access to nature.</p> <p>The Council notes the suggestion that the policy be amended to include specific reference as to how development proposals be required to protect and conserve irreplaceable habitats. The Council will consider amending the policy wording according.</p>	<p>Amend new Local Plan Policy GR 03 B to read –</p> <p><i>"They must also protect and conserve irreplaceable habitats, protected and priority habitats, and species that sit outside of the SINC network, with reference to the London Environment Strategy."</i></p>

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>ensure that there is an explicit reference to irreplaceable habitats in the policy. 25</p> <p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing</p> <p>No (I do not wish to participate in an examination hearing session)</p>		
CON133	REP640		Bridget Fox		Policy LSA SA 08	<p>To which part of the Lewisham South Area chapter does your representation relate? (Representations must be made on a specific policy within the Lewisham South Area chapter. Please state the policy number and name in the box below) - Policy name/number</p> <p>Site allocation 8: Land at Pool Court</p> <p>Do you consider that this part of the Lewisham South Area chapter is legally compliant: - Legally Compliant</p> <p>Yes</p> <p>Do you consider that this part of the High Quality Design chapter is sound - Soundness</p> <p>Yes</p> <p>Do you consider that this part of the Lewisham South Area chapter is compliant with the Duty to Co-operate - Duty to Co-operate</p> <p>Yes</p> <p>Please give details of why you consider this part of the Lewisham South Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments</p> <p>Ancient woodland is recognised as an irreplaceable habitat which must be protected from development unless there are exceptional circumstances and suitable compensation is provided (NPPF para 180c). Ancient and veteran trees outside woods have the same legal protection as ancient woodland, and require suitable buffer zones and root protection areas to be specified. There is a veteran Crack Willow tree recorded on the Ancient Tree Inventory (Tree ID: ID232560) at grid</p>	<p>The notes and welcomes the broad level of support offered in relation of the new Local Plan Policy LSA SA 08 Land at Pool Court.</p> <p>The Council notes that the respondent has indicated that the policy is considered legally compliant and sound.</p> <p>The Council notes the suggestion that the policy be amended to include specific reference as to how development proposals be required to protect and seek to enhance ancient and/ or veteran trees in addition to the SINC. The Council considers that this addition would be helpful and agrees to consider amended text as a modification.</p>	<p>Amend new Local Plan Policy LSA SA 08 Paragraph 17.23 to read –</p> <p><i>“Paragraph 17.23 2. Development proposals must protect and seek to enhance green infrastructure and biodiversity, including the SINC and any ancient or veteran trees.”</i></p>

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>reference TQ3730273027, which is either within or adjacent to this proposed development site. We note that the policy in 17.43 section 2 says "Development proposals must protect and seek to enhance green infrastructure and biodiversity, including the SINC."</p> <p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible</p> <p>We request that the wording "and any ancient or veteran trees" be added after "the SINC". This will improve compliance with national policy by protecting such trees from loss or fragmentation and from harmful effects of pollution or encroachment on root areas. It will also make a positive contribution to requirements for net gain and nature recovery, as well as better reflecting the aspirations of the England Trees Action Plan and National Model Design Code.</p> <p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing</p> <p>No (I do not wish to participate in an examination hearing session)</p>		
CON134	REP641		Camilla Barlow		Policy GR 03	<p>To which part of the Green Infrastructure chapter does your representation relate? (Representations must be made on a specific policy within the Green Infrastructure chapter. Please state the policy number and name in the box below) - Policy name/number</p> <p>GR3 Biodiversity and access to nature</p> <p>Do you consider that this part of the Green Infrastructure chapter is legally compliant: - legally compliant</p> <p>Yes</p>	<p>The Council note the comments made in relation to the new Local Plan Policy GR 03 Biodiversity and access to nature.</p> <p>The Council acknowledges and welcomes the suggested addition to the policy's supporting text and considers that an addition would provide additional clarity.</p>	<p>Amend the new Local Plan Policy GR 03 Paragraph 10.13 to read –</p> <p><i>"Development proposals must seek to avoid harm to and protect biodiversity as well as maximise opportunities to enhance the value of habitats wherever possible. For example, this could include, where appropriate, integrated bird, bat and bee bricks,</i></p>

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>Do you consider that this part of the Green Infrastructure chapter is sound - sound No</p> <p>Do you consider that this part of the Green Infrastructure chapter is compliant with the Duty to Co-operate - Co-operate Yes</p> <p>Please give details of why you consider this part of the Green Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments</p> <p>The Biodiversity Action Plan at section 10.13 states: "Access to nature is a key component of living in an urban environment as it offers opportunities for respite, relaxation and education. Lewisham residents generally benefit from good access to green and open spaces. Where new development comes forward opportunities should be taken to introduce additional biodiversity features across the Borough, and particularly in the areas of deficiency". It is important to include a list of examples of ecological enhancements that will provide the biodiversity, such as integrated bird, bat and bee bricks, hedgehog highways and reptile refugia/logpiles etc. The government recognises the importance of bird bricks (which are not included in the Biodiversity Net Gain Metric), and expects local authorities to condition them separately.</p> <p>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. - (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible N/A</p>		<i>hedgehog highways and reptile refugia/log piles..."</i>

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing</p> <p>No (I do not wish to participate in an examination hearing session)</p>		
CON135	REP642		Will Martin		EC 03	<p>What is your organisation? - Organisation w2m Planning</p> <p>To which part of the Economy and Culture chapter does your representation relate? (Representations must be made on a specific policy within the Housing chapter. Please state the policy number and name in the box below) - Policy name/number EC3</p> <p>Do you consider that this part of the Economy and Culture chapter is legally compliant: - legally compliant Yes</p> <p>Do you consider that this part of the Economy and Culture chapter is sound - sound No</p> <p>Do you consider that this part of the Economy and Culture chapter is compliant with the Duty to Co-operate - Duty to Co-operate Yes</p> <p>Please give details of why you consider this part of the Economy and Culture chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. - If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments The policy allows for live work units to be developed within areas and on sites which have viable business users already occupying them. The policy is to heavily in favour of redevelopment of these sites where justification of the protection existing businesses could be demonstrated on economic development grounds. Unfortunately traditional businesses and supply chains are being forced from the area with their sites being</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 03 High quality employment areas and workspace.</p> <p>The comments made in relation to the retention of existing business are noted. The Council remains committed to supporting the Borough's existing and future business communities. The new Local Plan seeks to protect and enhance existing businesses. The Spatial Strategy, Policies EC 1 and EC 2 seek to achieve this objective. Furthermore, Policy EC 04 Low-cost and affordable workspace seeks to ensure that new employment land provision also delivers an appropriate and proportionate amount of affordable workspace.</p> <p>The statement that new employment land development is fuelling the market and consequently raising rents, and thereby making provision less affordable, is noted. The Council is sympathetic to those businesses that have experienced this adverse impact from the free market. As set out above the new Local Plan seeks to respond to this matter.</p> <p>Plan-making and decision-taking are two of the Council's responsibilities and there are other mechanisms – through economic and regeneration services – that seek to support business communities.</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>redeveloped, this in turn is reducing the diversity of businesses supported in the area. We would note that such a site is 111-115 Endwell Road, which whilst proposing employment floorspace is also allowing live / work units which is likely to result in the existing leasehold business being removed from the site and this supply chain being lost from the district.</p> <p>If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Participate in examination hearing</p> <p>No (I do not wish to participate in an examination hearing session) 28</p>		
CON136	REP643		Commonplace Response 1		<p>Policy GR 03</p> <p>Paragraph 10.13</p>	<p>1.To which part of the Green Infrastructure chapter does you representation relate? (Representations must be made on a specific policy within the Green Infrastructure chapter. Please state the policy number and name in the box below) - Green Infrastructure</p> <p>GR3 Biodiversity and access to nature</p> <p>2. Do you consider that this part of the Green Infrastructure chapter is legally compliant? - Green Infrastructure</p> <p>Yes</p> <p>3. Do you consider that this part of the Green Infrastructure chapter is sound? - Green Infrastructure</p> <p>No</p> <p>4. Do you consider that this part of the Green Infrastructure chapter is compliant with the Duty to Co-operate? - Green Infrastructure</p> <p>Yes</p> <p>5. Please give details of why you consider this part of the Green Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) - Green Infrastructure</p> <p>Reference in 10.13 to the Biodiversity Action Plan (BAP) is welcome as this covers ecologically important items such as swift bricks (the government refers to these as "species features" in their latest Biodiversity Net Gain (BNG) consultation response (March 2023), where they confirm</p>	<p>The Council notes the comments and suggested amendments to the new Local Plan Policy GR 03 Biodiversity and access to nature; specifically in relation to Paragraph 10.13.</p> <p>The Council welcomes the broad level of support offered to the new Local Plan Policy GR 03. The identification of the typographic error is noted and appreciated. Upon further consideration the Council agrees that the use of the word “must” is reasonable and importantly consistent with its usage elsewhere within the associated supporting text.</p>	<p>Amend the new Local Plan Policy GR 03 Paragraph 10.13 to read –</p> <p><i>“Applicants must refer to the latest Lewisham Biodiversity Action Plan, currently A Natural Renaissance for Lewisham (2021), which sets out information on the vision and opportunities for the borough including consideration for potential requirements for important species features such as swift bricks which are not included in the Biodiversity Net Gain calculation.”</i></p>

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>that these species features are not included in the BNG metric and local authorities must condition them independently), which are not covered by Biodiversity Net Gain, Urban Greening or Green Infrastructure. However, 10.13 is not fully sound as there is a typo (missing "to"), and applicants "must" refer to the BAP, and please for clarity provide a reference to swift bricks in the Local Plan itself.</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - Green Infrastructure</p> <p>Final sentence of 10.13 to read: Applicants must refer to the latest Lewisham Biodiversity Action Plan, currently A Natural Renaissance for Lewisham (2021), which sets out information on the vision and opportunities for the borough including requirements for important species features such as swift bricks which are not included in the Biodiversity Net Gain calculation. 29</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? -Green Infrastructure Yes (I do wish to participate in an examination hearing session)</p> <p>8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary - Green Infrastructure To provide further information, if it is required.</p>		
CON137	REP644		Commonplace Response 2		Policy LNA SA 01	<p>1.To which part of the Lewisham's North Area chapter does your representation relate? (Representations must be made on a specific policy within the Lewisham's North Area chapter. Please state the policy number and name in the box below) - Lewisham's North Area All parts</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 01 Convoys Wharf Mixed-Use Employment Location.</p> <p>The Council remains committed to working positively with development industry partners to secure and deliver</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>2. Do you consider that this part of the Lewisham's North Area chapter is legally compliant? - - Lewisham's North Area No</p> <p>3. Do you consider that this part of the Lewisham's North Area chapter is sound? - Lewisham's North Area No</p> <p>4. Do you consider that this part of the Lewisham's North Area chapter is compliant with the Duty to Co-operate? - Lewisham's North Area No</p> <p>5. Please give details of why you consider this part of the Lewisham's North Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) -Lewisham's North Area Convoys Wharf has been sitting empty for too long. Strategy needs to include a start and end date for this development (or revoke all planning permissions).</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - Lewisham's North Area See above</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - {63e24470ce7cace3c9f44930} - Lewisham's North Area No (I do not wish to participate in an examination hearing session)</p>	the successful and sustainable places that the Borough needs. In parallel, the Council is also committed to positively meeting the challenge of the national housing crisis – and deliver new homes, and significantly boost housing delivery, to meet the needs of the Borough’s residents and communities in a timely manner. In this respect the Council shares the respondent’s concerns and frustrations that some development sites are taking longer to come forward than anticipated. Whilst some delays are caused by legitimate and unmanageable factors – such as global economic conditions – others are less excusable. Unfortunately, the current planning system, and its associated legislation, places an inequitable burden for delivery upon local planning authorities, when the development industry should take the lion-s share of responsibility for any delay post-consent. The Council continues to clarify this real-world position and will work with development industry partners to ensure that legitimate delays in delivery are minimised.	
CON138	REP645		Commonplace Response 3		Policy SD 02	1.To which part of the Sustainable Design & Infrastructure chapter does your representation relate? (Representations must be made on a specific policy within the Sustainable Design & Infrastructure chapter.	The Council notes the comments made in relation to the new Local Plan Policy SD 02 Sustainable Design and Retrofitting.	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>Please state the policy number and name in the box below) - Sustainable Design & Infrastructure</p> <p>5 qd 1 Design</p> <p>2. Do you consider that this part of the Sustainable Design & Infrastructure chapter is legally compliant? - Sustainable Design & Infrastructure</p> <p>No</p> <p>3. Do you consider that this part of the Sustainable Design & Infrastructure chapter is sound? - Sustainable Design & Infrastructure</p> <p>No</p> <p>4. Do you consider that this part of the Sustainable Design & Infrastructure chapter is compliant with the Duty to Co-operate? - Sustainable Design & Infrastructure</p> <p>No</p> <p>5. Please give details of why you consider this part of the Sustainable Design & Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) Sustainable Design & Infrastructure</p> <p>Nowhere in building design does it address or require buildings to include passive cooling such as sun shields etc. London is getting hotter and to buildings need passive solar and ventilation cooling designs. Otherwise people will be forced to install and use air conditioning, adding to climate change.</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - Sustainable Design & Infrastructure</p> <p>Need to specify passive solar/air cooling in all new builds.</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in</p>	<p>This policy seeks to secure sustainable design outcomes from new developments and from retrofitting (to existing buildings). The policy speaks to the spectrum of sustainable design measures – including those relating to energy use and heat risk.</p> <p>The Council acknowledges that passive cooling measures, such as sun shield, may in certain circumstances provide appropriate solutions to the challenges presented by climate change. The Council considers that the approach set out through the new Local Plan’s planning policies, including Policy SD 02, provide a sound framework for addressing this matter. The Council suggests that providing a fully comprehensive list of potential sustainable design solutions is unnecessary. The new Local Plan is sufficiently sound in its current wording.</p>	

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>examination hearing session(s)? - Sustainable Design & Infrastructure</p> <p>No (I do not wish to participate in an examination hearing session)</p>		
CON139	REP646		Commonplace Response 4		Policy TR 03	<p>1. To which part of the Transport and Connectivity chapter does your representation relate? (Representations must be made on a specific policy within the Transport and Connectivity chapter. Please state the policy number and name in the box below) - Transport and Connectivity</p> <p>TR3</p> <p>2. Do you consider that this part of the Transport and Connectivity chapter is legally compliant? - - Transport and Connectivity</p> <p>Yes</p> <p>3. Do you consider that this part of the Transport and Connectivity chapter is sound? - Transport and Connectivity</p> <p>Yes</p> <p>4. Do you consider that this part of the Transport and Connectivity chapter is compliant with the Duty to Co-operate? - Transport and Connectivity</p> <p>No</p> <p>5. Please give details of why you consider this part of the Transport and Connectivity chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) - Transport and Connectivity</p> <p>Does not address the problem of bins being left out on streets all week.</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - Transport and Connectivity</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy TR 03 Healthy streets as part of healthy neighbourhoods.</p> <p>The Council understands that operational matters, such as those relating to waste collection, are important to residents and communities. The Council seeks to respond to issues relating to operational matters, such as those referred to in this representation, positively. The matters raised in this representation have been passed to the Council's Waste Collection service to be addressed as an operational matter.</p> <p>In plan-making terms, the provision of appropriate on-site storage facilities for waste collection bins is a matter that is addressed through several planning policies contained within the new Local Plan. For example, those policies that seek high quality design and manage delivery of new places – specifically in respect of the effective operation of inter-related infrastructure networks; including waste collection.</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>Strategy needs to include something on ensuring residents don't leave bins out on streets. This is a hazard to those with disabilities, elderly and with children. Council needs a plan to ensure pavements are kept clear and this is enforced.</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Transport and Connectivity</p> <p>No (I do not wish to participate in an examination hearing session)</p>		
CON140	REP647		Commonplace Response 5		Policy LNA 01	<p>1. To which part of the Lewisham's North Area chapter does your representation relate? (Representations must be made on a specific policy within the Lewisham's North Area chapter. Please state the policy number and name in the box below) - Lewisham's North Area</p> <p>Lna1</p> <p>2. Do you consider that this part of the Lewisham's North Area chapter is legally compliant? - - Lewisham's North Area</p> <p>Yes</p> <p>3. Do you consider that this part of the Lewisham's North Area chapter is sound? - Lewisham's North Area</p> <p>No</p> <p>4. Do you consider that this part of the Lewisham's North Area chapter is compliant with the Duty to Co-operate? -Lewisham's North Area</p> <p>No</p> <p>5. Please give details of why you consider this part of the Lewisham's North Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) -Lewisham's North Area</p> <p>The plans do not include anything on safer/clear streets. Local residents not removing bins from outside their homes and leaving permanently on streets causes significant problems for elderly people, those with disabilities and young children. There is no point in talking about cleaner streets in terms of trees etc unless this is also addressed.</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LNA 01 North Area Place Principles.</p> <p>The Council understands that operational matters, such as those relating to waste collection, are important to residents and communities. The Council seeks to respond to issues relating to operational matters, such as those referred to in this representation, positively. The matters raised in this representation have been passed to the Council's Waste Collection service to be addressed as an operational matter.</p> <p>In plan-making terms, the provision of appropriate on-site storage facilities for waste collection bins is a matter that is addressed through several planning policies contained within the new Local Plan. For example, those policies that seek high quality design and manage delivery of new places – specifically in respect of the effective operation of inter-related infrastructure networks; including waste collection.</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - Lewisham's North Area</p> <p>See above.</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Lewisham's North Area</p> <p>No (I do not wish to participate in an examination hearing session)</p>		
CON141	REP648		Commonplace Response 6			<p>3. Do you consider that this part of the Planning for an Open Lewisham chapter is sound?</p> <p>- Part 1: Planning for an Open Lewisham</p> <p>Yes</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s) Part 1: Planning for an Open Lewisham</p> <p>No (I do not wish to participate in an examination hearing session)</p>	The comment and implied support for the new Local Plan Policy OL 01 Delivering an Open Lewisham (spatial strategy) is noted and welcomed.	No further action required in relation to this representation.
CON142	REP649		Commonplace Response 7		Policy EC 15	<p>1.To which part of the Economy and Culture chapter does you representation relate? (Representations must be made on a specific policy within the Economy and Culture chapter. Please state the policy number and name in the box below) - Economy and Culture</p> <p>EC15</p> <p>2. Do you consider that this part of the Economy and Culture chapter is legally compliant? - Economy and Culture</p> <p>No</p> <p>3. Do you consider that this part of the Economy and Culture chapter is sound? - Economy and Culture</p> <p>No</p> <p>4. Do you consider that this part of the Economy and Culture chapter is compliant with the Duty to Co-operate? Economy and Culture</p> <p>No</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy EC 15 Local Centres.</p> <p>The Council notes the comments made in relation to securing high quality, accessible and inclusive design. The Council understands and agrees with these sentiments. The new Local Plan seeks to address these objectives through its site allocations and planning policies. In conclusion, the new Local Plan is sound in this respect.</p> <p>Finally, the suggestion that the Council retain ownership of redeveloped Local Centres is noted. This may be a mechanism that the Council pursues in</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>5. Please give details of why you consider this part of the Economy and Culture chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) - Economy and Culture</p> <p>Redesign has to take more consideration of consultation from people living in the area as well as implement local council run outlets and properties NOT privatised sanitised wastelands of gated exclusion.</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - Economy and Culture</p> <p>Lewisham Local Council maintains ownership of the project thereby protecting the interests by upholding the democratic process of local residents at all times.</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Economy and Culture</p> <p>Yes (I do wish to participate in an examination hearing session)</p> <p>8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary - - Economy and Culture</p> <p>I am an owner occupier living in the Borough of Lewisham and any development will impact me as well as all other residents of the Borough.</p>	specific circumstances where it is viable and appropriate. However, this is not an approach that can be guaranteed in every potential development scenario. It would be unsound to suggest otherwise.	
CON143	REP650		Commonplace Response 8		Policy QD 04	<p>1.To which part of the High Quality Design chapter does your representation relate? (Representations must be made on a specific policy within the High Quality Design chapter. Please state the policy number and name in the box below) - High Quality Design</p> <p>QD4Building heights</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy QD 04 Building Heights.</p> <p>The Council understands that existing residents and communities are concerned that new higher intensity taller developments could have an</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>2. Do you consider that this part of the High Quality Design chapter is legally compliant? - High Quality Design Yes</p> <p>3. Do you consider that this part of the High Quality Design chapter is sound? - High Quality Design Yes</p> <p>4. Do you consider that this part of the High Quality Design chapter is compliant with the Duty to Co-operate? - High Quality Design No</p> <p>5. Please give details of why you consider this part of the High Quality Design chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) - High Quality Design Lewisham has a recent history of allowing high rise properties that fail to conform to a High Quality standard, and also compromise the local environment with particular relations to light and air movement standards.</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - High Quality Design Plans for any high rise require much more careful modelling to justify the claims to be legally compliant.</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - High Quality Design No (I do not wish to participate in an examination hearing session)</p>	<p>impact upon the visual character and appearance of the Borough. The Council shares those concerns and has sought to ensure that the new Local Plan addresses this matter comprehensively in terms of evidence, master planning and the design led approach. Consequently, the approach to optimising site development capacities (Policies QD 06 and EC 13); building height (Policy QD 04); high quality design (Policy QD 01); High Quality Housing Design (Policy QD 08); and Master planning (Policy DM 03), serves to provide a framework for meeting these objectives. The Council considers this to be a sound approach.</p>	
CON144	REP651		Commonplace Response 9		Policy GR 05	<p>1.To which part of the Green Infrastructure chapter does your representation relate? (Representations must be made on a specific policy within the Green Infrastructure</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy GR 05 Urban Greening and Trees.</p>	<p>No further action required in relation to this representation.</p>

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>chapter. Please state the policy number and name in the box below) - Green Infrastructure GR6</p> <p>2. Do you consider that this part of the Green Infrastructure chapter is legally compliant? - Green Infrastructure Yes</p> <p>3. Do you consider that this part of the Green Infrastructure chapter is sound? - Green Infrastructure No</p> <p>4. Do you consider that this part of the Green Infrastructure chapter is compliant with the Duty to Co-operate? - Green Infrastructure Yes</p> <p>5. Please give details of why you consider this part of the Green Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) - Green Infrastructure Whilst strong focus on trees is welcome, it ignores wildflowers and flowering plants more generally which support bees etc. Trees alone will not help insect life - we need nectar sources too. Insects are the basis for wider biodiversity.</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - Green Infrastructure Include planting of year-round nectar sources, not just trees.</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Green Infrastructure No (I do not wish to participate in an examination hearing session)</p>	<p>The Council notes and acknowledges the comments made in relation urban greening. The expressed sentiment that urban greening be inclusive of a wide range of different species and planting typologies is fully acknowledged. The Council agrees that green infrastructure must be inclusive of all appropriate species and habitats in meeting the objective of positively shaping the Borough's places.</p> <p>For clarity, the policy supporting text at Paragraph 10.23 states –</p> <p><i>“Urban greening is a term used to describe a wide range of measures that can be incorporated into buildings and spaces to increase green cover in the Borough. These measures include but are not limited to: tree planting, naturalised biodiverse landscaping, green roofs and walls, hedges, climbers, plants for pollinators, de-paving, rain gardens and sustainable drainage systems using natural or semi-natural features”.</i></p> <p>The Council considers that this fully addresses the respondent's concerns.</p>	

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
CON145	REP652		Commonplace Response 10		Policy OL 01 Table 3.2: Lewisham Local Plan – Strategic objectives	<p>1. To which part of the Transport and Connectivity chapter does your representation relate? (Representations must be made on a specific policy within the Transport and Connectivity chapter. Please state the policy number and name in the box below) - Transport and Connectivity</p> <p>G17. Healthy and Safe Communities</p> <p>2. Do you consider that this part of the Transport and Connectivity chapter is legally compliant? - Transport and Connectivity</p> <p>No</p> <p>3. Do you consider that this part of the Transport and Connectivity chapter is sound? - Transport and Connectivity</p> <p>No</p> <p>4. Do you consider that this part of the Transport and Connectivity chapter is compliant with the Duty to Co-operate? - Transport and Connectivity</p> <p>No</p> <p>5. Please give details of why you consider this part of the Transport and Connectivity chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) -- Transport and Connectivity</p> <p>It's unsound because it refers to the "Healthy Streets Approach" which is not defined. The whole section is a wishy-washy jumble of meaningless words with few specific applications.</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - Transport and Connectivity</p> <p>To make it sound it needs totally rewriting into plain English.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy OL 01 Spatial strategy - Table 3.2: Lewisham Local Plan – Strategic objectives.</p> <p>The Council notes the respondent's comments that the references to Healthy Streets are not defined under Table 3.2. For clarity, this is a matter that is fully set out under Chapter 12 Transport and Connectivity, specifically under Policy TR 03 Healthy streets as part of healthy neighbourhoods. The Council notes that the new Local Plan must be read and considered as a whole. The suggestion that the new Local Plan is unsound simply because a specific term is not fully defined within a table setting out strategic objectives is discounted.</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Transport and Connectivity</p> <p>No (I do not wish to participate in an examination hearing session)</p>		
CON146	REP653		Commonplace Response 11		Policy OL 01	<p>1.To which part of the Planning for an Open Lewisham chapter does you representation relate? (Representations must be made on a specific policy within the Planning for an Open Lewisham chapter. Please state the policy number and name in the box below) - - Part 1: Planning for an Open Lewisham</p> <p>A1 . I do not understand what is meant by "an Open Lewisham". Meaningless words not defined anywhere.</p> <p>2. Do you consider that this part of the Planning for an Open Lewisham chapter is legally compliant?- Part 1: Planning for an Open Lewisham</p> <p>No</p> <p>3. Do you consider that this part of the Planning for an Open Lewisham chapter is sound? - - Part 1: Planning for an Open Lewisham</p> <p>No</p> <p>4. Do you consider that this part of the Planning for an Open Lewisham chapter is compliant with the Duty to Co-operate? - Part 1: Planning for an Open Lewisham</p> <p>No</p> <p>5. Please give details of why you consider this part of the Planning for an Open Lewisham chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) -Part 1: Planning for an Open Lewisham</p> <p>It cannot be compliant because it is not defined and is meaningless.</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Part 1: Planning for an Open Lewisham</p> <p>No (I do not wish to participate in an examination hearing session)</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy OL 01 Delivering an Open Lewisham (spatial strategy).</p> <p>The Council maintains that the new Local Plan provides a positively prepared, justified, and appropriate spatial strategy that will serve to positively deliver successful and sustainable places and meet the needs of the Borough’s existing and future residents and communities. The Council notes that the respondent has not provided any evidence to suggest the contrary.</p> <p>The comments that imply that the new Local Plan must, in some form, precisely define the term “Open Lewisham” is noted. The Council considers that the new Local Plan Policy OL 01 and its supporting text, which includes the plan vision and objectives, provides such a definition. The term Open Lewisham is fundamentally about securing the growth and place-shaping that responds and meets the needs of the Borough’s residents and communities – being inclusive and accessible. The Council considers that this is reasonably clear.</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
CON147	REP654		Commonpla ce Response 12			<p>1.To which part of the Lewisham's Central Area chapter does you representation relate? (Representations must be made on a specific policy within the Lewisham's Central Area chapter. Please state the policy number and name in the box below) - Lewisham's Central Area</p> <p>None</p> <p>5. Please give details of why you consider this part of the Lewisham's Central Area chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) - Lewisham's Central Area</p> <p>Hither Green is ignored. The shops and pavements along Springbank Road have not been identified as an area for investment at all.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LCA 01 Central Area Place Principles.</p> <p>The Council notes and acknowledges that Hither Green is not explicitly signalled nor referenced in the new Local Plan. This is not unusual, nor a mater of concern as it is not reasonably possible for a new Local Plan to make explicit reference to all paces within its administrative boundary.</p> <p>The Council notes residents’ concerns that places within the Borough appear to be neglected. This is not the case. The new Local Plan must be read and considered as a whole. There will be places in the Borough that are not locations for future growth but that does not mean that they will not receive investment in infrastructure.</p> <p>The Council highlights that Policy LCS 01 and the accompanying Figure 14.2 identify some of the infrastructure networks that pass through the area, including Hither Green. The Council remains committed to ensuring that investment in infrastructure networks matches the scale of growth being delivered across the whole Borough.</p>	No further action required in relation to this representation.
CON148	REP655		Commonpla ce Response 13			<p>Commonplace Response 13</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible -</p> <p>Transport and Connectivity</p>	<p>The Council notes the comments made in relation to the Zone pricing structure applied to the Capital’s rail stations – specifically Grove Park Station.</p> <p>The Council acknowledges that this is a genuine and legitimate issue for the Borough’s residents and communities – particularly during these challenging economic times. Unfortunately, this is not a matter that the Council through the new Local Plan can directly</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						I would like to see the prioritisation of Grove Park station being re designated as zone 2/3 like all other stations in the borough.	influence; neither is it a matter of soundness.	
CON149	REP656		Commonplace Response 14		Policy GR 05	<p>2. Do you consider that this part of the Green Infrastructure chapter is legally compliant? - Green Infrastructure No</p> <p>3. Do you consider that this part of the Green Infrastructure chapter is sound? - Green Infrastructure No</p> <p>4. Do you consider that this part of the Green Infrastructure chapter is compliant with the Duty to Co-operate? - Green Infrastructure No</p> <p>5. Please give details of why you consider this part of the Green Infrastructure chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) - Green Infrastructure Lewisham needs to not just apply hollow words on green infrastructure. The Borough is still destroying mature trees. Green infrastructure is also about prioritising walking and cycling etc over cars, so would like to see closure of traffic rat runs.</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - Green Infrastructure See above. Lewisham should not destroy mature trees without the local consent of the community. The poor air quality in the Borough makes this a priority</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Green Infrastructure</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy GR 05 Urban greening and trees.</p> <p>The Council notes and acknowledges that mature trees make a valued contribution towards the Borough's visual character and appearance, and as green infrastructure help mitigate some of the adverse impacts of climate change. The Council considers that the new Local Plan provides as much protection as it reasonably can provide to existing green infrastructure assets. The Council highlights that mature trees are protected through other parallel measures – such as Tree Preservation Orders and Conservation Area designation. Furthermore, the Council deploys Tree Officers and Ecologists to support, manage and enhance the Borough's treescapes. This includes taking regulatory action when it is necessary.</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						No (I do not wish to participate in an examination hearing session)		
CON150	REP657		Commonplace Response 15		Policy TR 04	<p>1. To which part of the Transport and Connectivity chapter does your representation relate? (Representations must be made on a specific policy within the Transport and Connectivity chapter. Please state the policy number and name in the box below) - Transport and Connectivity</p> <p>TR4</p> <p>2. Do you consider that this part of the Transport and Connectivity chapter is legally compliant? - Transport and Connectivity</p> <p>Yes</p> <p>3. Do you consider that this part of the Transport and Connectivity chapter is sound? - - Transport and Connectivity</p> <p>No</p> <p>4. Do you consider that this part of the Transport and Connectivity chapter is compliant with the Duty to Co-operate? - Transport and Connectivity</p> <p>Yes</p> <p>5. Please give details of why you consider this part of the Transport and Connectivity chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) - Transport and Connectivity</p> <p>This part of the document mentions disability only twice as far as I can see; considering you have a large hospital in your area I would expect to see many more references to disabled people and their difficulties with transport. Many need door to door facilities and will require suitable parking at their residence and also at various clinics around the borough. Young mothers with young children (some also disabled) unable yet to walk also require good reliable transport so they are not waiting at bus stops in the cold; primary children of varying ages will require dropping off to different schools & nursery which will not be practical by bus for single parent families with the parent then still having to make their way to work after the school run. Some allowance must be made for them to travel by car. As the family becomes older they may well be able to travel in a more</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy TR 04 Parking.</p> <p>The comments relating to accessibility – namely, that parking provision should be accessible to all – are noted. The Council recognises the importance of ensuring that all infrastructure networks are accessible to the Borough’s existing and future residents and communities. This is a thread that runs through the entire new Local Plan. As stated in previous responses, the new Local Plan must be considered in its entirety – as indeed, it will be when applied to the decision-taking process. In this respect, the Council refers to the Policy OL 01 Spatial Strategy; Policy TR 01 Sustainable Transport and Movement; and Policy QD 02 Inclusive and Safe Design, as examples.</p> <p>In terms of future parking provision, the Council is committed to meeting the challenges of climate change mitigation; specifically significant carbon reduction; through genuinely sustainable development. Managing the continued evolution of private vehicle ownership and usage is an important part of that challenge. The new Local Plan is founded upon a spatial strategy that is committed to reducing car use across the Borough, providing improved access to services, facilities, amenities, and sustainable travel networks. The management of parking provision will be part of that evolutionary process and will complement the growth and</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>environmentally way but will still need to park their bikes safely a/ at home - a single car space would be suitable for a family of 4 bicycles so they will still require plans for that space linked to their residence and b/ secure spaces at work and school. You do mention cargo bikes which is a small step in the right direction but these will require a larger area of dedicated secure parking at home & work and not everybody can afford a garden or garage.</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible -</p> <p>Transport and Connectivity</p> <p>If you are serious about about making travel greener you also have to make it family friendly so allow young families to use a car when the children are young, then encourage them onto bikes and buses when they are older. Consider a school bus or subsidise schools who supply them for example. You have to make allowances for the disabled in the community for door to door travel in the form of disabled parking space % in residences and in hospitals and clinics for the end of their journey. Unfortunately I will not be able to participate in the hearing in person but would be able to attend on Teams or zoom (which would be more environmentally friendly too). Thanks for listening.....</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? -Transport and Connectivity</p> <p>Yes (I do wish to participate in an examination hearing session)</p> <p>8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary -</p> <p>Transport and Connectivity</p> <p>I can attend virtually. There is a perception in this borough that you do not listen to the public when making this type of decision - we need to be future proof and</p>	<p>infrastructure strategy for the plan period.</p> <p>The Council appreciates and understands that the forthcoming evolution of how people use and/ or own private vehicles may be challenging for residents and communities. Nevertheless, it is important that the Council demonstrates leadership towards this important issue. The inevitable changes in how people use, and own private vehicles must be progressed in parallel with improvements to sustainable travel networks and services – so that residents and communities have a genuine choice. The Council considers that such investment is being planned-for and made in support of new development. This is evidenced through the new Local Plan and the associated Infrastructure Delivery Plan. For these reasons the Council concludes that the new Local Plan is sound.</p>	

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						have input from all sections of the community; the appearance is that you have excluded the disabled people with little mention of them in this Transport plan. You can rectify that by allowing, no encouraging them, to attend and actually hear their feedback and virtually is the way to go. Also children do not have a voice here - you should ask at schools for suggestions too. If the child wishes to bike to school then the parent/guardian will be the person to facilitate this, and you have to facilitate them.		
CON151	REP658		Commonplace Response 16			<p>1. To which part of the Heritage chapter does your representation relate? (Representations must be made on a specific policy within the Heritage chapter. Please state the policy number and name in the box below) - Heritage Lewisham Hermitage</p> <p>2. Do you consider that this part of the Heritage chapter is legally compliant?- Heritage Yes</p> <p>3. Do you consider that this part of the Heritage chapter is sound? - Heritage Yes</p> <p>4. Do you consider that this part of the Heritage chapter is compliant with the Duty to Co-operate? - Heritage Yes</p> <p>5. Please give details of why you consider this part of the Heritage chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) - Heritage Keeping the Boroughs heritage is vital as our heritage is important not only now but for future generations.</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible -Heritage</p>	<p>The Council notes and welcomes the stated support for the new Local Plan Policy HE 01 Lewisham's historic environment.</p> <p>The Council agrees that the preservation and enhancement of the Borough's statutory and non-designated heritage assets continues to be an important component of successful and sustainable place-making. The new Local Plan seeks to preserve or enhance the value and significance of Lewisham's historic environments through its spatial strategy, site allocations and planning policies.</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>Make Lewisham heritage an important part of any future improvements to the Borough of Lewisham</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Heritage</p> <p>No (I do not wish to participate in an examination hearing session)</p>		
CON152	REP659		Commonplace Response 17		Policy TR 04	<p>1. To which part of the Transport and Connectivity chapter does your representation relate? (Representations must be made on a specific policy within the Transport and Connectivity chapter. Please state the policy number and name in the box below) - Transport and Connectivity</p> <p>TR4</p> <p>2. Do you consider that this part of the Transport and Connectivity chapter is legally compliant? - Transport and Connectivity</p> <p>Yes</p> <p>3. Do you consider that this part of the Transport and Connectivity chapter is sound? - Transport and Connectivity</p> <p>No</p> <p>4. Do you consider that this part of the Transport and Connectivity chapter is compliant with the Duty to Co-operate? - Transport and Connectivity</p> <p>Yes</p> <p>5. Please give details of why you consider this part of the Transport and Connectivity chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) - Transport and Connectivity</p> <p>It is unsound because restrictions and resident parking zones will badly effect those who can't cycle. this includes families, older people and those offering lifts and services.</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy TR 04 Parking.</p> <p>The specific comments made in relation to the possible introduction of Controlled Parking Zones under Policy TR 04 G is noted. For clarity, the Council is responsible for managing on-street parking provision across the Borough. The effective management of parking provision is an important component measure that encourages more sustainable car usage patterns and ownership models. Furthermore, the capacity of on-street is finite. Consequently, it is reasonable for the Council to introduce appropriate measures to manage provision.</p> <p>The Council appreciates and understands that the forthcoming evolution of how people use and/ or own private vehicles may be challenging for residents and communities. Nevertheless, it is important that the Council demonstrates leadership towards this important issue. The inevitable changes in how people use, and own private vehicles must be progressed in parallel with improvements to sustainable travel networks and services – so that residents and communities have a genuine choice. The Council considers that such investment is being planned-for and</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible --</p> <p>Transport and Connectivity</p> <p>See above</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Transport and Connectivity</p> <p>No (I do not wish to participate in an examination hearing session)</p>	<p>made in support of new development. This is evidenced through the new Local Plan and the associated Infrastructure Delivery Plan. For these reasons the Council concludes that the new Local Plan is sound.</p>	
CON153	REP660		Commonplace Response 18		Policy OL 01	<p>1. To which part of the Planning for an Open Lewisham chapter does your representation relate? (Representations must be made on a specific policy within the Planning for an Open Lewisham chapter. Please state the policy number and name in the box below) - - Part 1: Planning for an Open Lewisham</p> <p>Being open and transparent</p> <p>2. Do you consider that this part of the Planning for an Open Lewisham chapter is legally compliant? - Part 1: Planning for an Open Lewisham</p> <p>Yes</p> <p>3. Do you consider that this part of the Planning for an Open Lewisham chapter is sound? - - Part 1: Planning for an Open Lewisham</p> <p>Yes</p> <p>4. Do you consider that this part of the Planning for an Open Lewisham chapter is compliant with the Duty to Co-operate? - Part 1: Planning for an Open Lewisham</p> <p>Yes</p> <p>5. Please give details of why you consider this part of the Planning for an Open Lewisham chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) Part 1: Planning for an Open Lewisham</p> <p>We need to be open and transparent to represent every one in the Borough of Lewisham</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that</p>	<p>The Council notes and welcomes the stated support for the new Local Plan Policy OL 01 Delivering an Open Lewisham (spatial strategy).</p> <p>The Council remains committed to representing the Borough's residents and communities to ensure that future growth positively contributes towards making Lewisham a successful and sustainable place. The Council continues to be open and transparent in its plan-making and decision-taking responsibilities.</p>	<p>No further action required in relation to this representation.</p>

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						<p>non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible - Part 1: Planning for an Open Lewisham</p> <p>To be honest open and transparent to represent everyone who lives works or visits the Borough of Lewisham</p>		
CON154	REP661		Commonplace Response 18		Policy TR 01	<p>1. To which part of the Transport and Connectivity chapter does your representation relate? (Representations must be made on a specific policy within the Transport and Connectivity chapter. Please state the policy number and name in the box below) - Transport and Connectivity</p> <p>Increase journeys by walking cycling and public transport</p> <p>2. Do you consider that this part of the Transport and Connectivity chapter is legally compliant? - Transport and Connectivity</p> <p>Yes</p> <p>3. Do you consider that this part of the Transport and Connectivity chapter is sound? - Transport and Connectivity</p> <p>Yes</p> <p>4. Do you consider that this part of the Transport and Connectivity chapter is compliant with the Duty to Co-operate? Transport and Connectivity</p> <p>Yes</p> <p>5. Please give details of why you consider this part of the Transport and Connectivity chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) - Transport and Connectivity</p> <p>We need invest in public transport to support growing local populations and new developments while making public transport sustainable as possible. More use of electric and hydrogen buses. Wider pavements for pedestrians and more cycle lanes for cyclists..</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness</p>	<p>The Council notes and welcomes the supportive comments made in relation to the new Local Plan Policy TR 01 Sustainable Travel and Movement.</p> <p>The Council is committed to delivering inclusive, safe, healthy, liveable, walkable, and sustainable neighbourhoods across Lewisham. The integration of land use and transport, along with effective public and sustainable transport networks will contribute meeting this objective. The Council considers that the new Local Plan, in parallel with the associated Infrastructure Delivery Plan, provides a good framework for achieving these objectives.</p>	No further action required in relation to this representation.

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						<p>matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible --</p> <p>Transport and Connectivity</p> <p>Improve public transport more frequent buses and new bus routes. Encourage more walking and cycling</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? -Transport and Connectivity</p> <p>No (I do not wish to participate in an examination hearing session)</p>		
CON155	REP662		Commonplace Response 19		Policy TR 04	<p>1.To which part of the Transport and Connectivity chapter does you representation relate? (Representations must be made on a specific policy within the Transport and Connectivity chapter. Please state the policy number and name in the box below) - Transport and Connectivity</p> <p>Parking</p> <p>2. Do you consider that this part of the Transport and Connectivity chapter is legally compliant? - - Transport and Connectivity</p> <p>No</p> <p>3. Do you consider that this part of the Transport and Connectivity chapter is sound? - Transport and Connectivity</p> <p>No</p> <p>5. Please give details of why you consider this part of the Transport and Connectivity chapter is not legally compliant, is unsound, or fails to comply with the duty to co-operate. (If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments) - Transport and Connectivity</p> <p>Strongly oppose any mandatory parking permits in my residential area</p> <p>6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy TR 04 Parking.</p> <p>The specific comments made in relation to the possible introduction of Controlled Parking Zones under Policy TR 04 G is noted. For clarity, the Council is responsible for managing on-street parking provision across the Borough. The effective management of parking provision is an important component measure that encourages mores sustainable car usage patterns and ownership models. Furthermore, the capacity of on-street is finite. Consequently, it is reasonable for the Council to introduce appropriate measures to manage provision.</p> <p>The Council appreciates and understands that the forthcoming evolution of how people use and/ or own private vehicles may be challenging for residents and communities. Nevertheless, it is important that the Council demonstrates leadership towards this</p>	No further action required in relation to this representation.

Consul tee Ref	Comme nt Ref	Organisati on (if relevant)	Name	Part	Section, policy, or paragraph	Comment	Officer response	Action
						<p>non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible Transport and Connectivity</p> <p>Remove any consideration of mandatory residential parking permits in my residential are</p> <p>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? - Transport and Connectivity</p> <p>No (I do not wish to participate in an examination hearing session)</p>	<p>important issue. The inevitable changes in how people use, and own private vehicles must be progressed in parallel with improvements to sustainable travel networks and services – so that residents and communities have a genuine choice. The Council considers that such investment is being planned-for and made in support of new development. This is evidenced through the new Local Plan and the associated Infrastructure Delivery Plan. For these reasons the Council concludes that the new Local Plan is sound.</p>	