



Dear Programme Officer

In your email of December 16 you invited comments (by February 3rd) on Lewisham's responses to the Inspector's questions regarding the DMLP. I am responding on behalf of the Blackheath Society.

We have a number of outstanding points on the DMLP which we will plan to make at one of the public meetings to be held in February. Specifically regarding the points arising out of the Inspector's questions however we do wish to make the following points in relation to DM 36-38.

DM 36-38

In response to the Inspector's questions, we strongly agree that DMs 36-38 add considerable value, provide clear policy guidance and should be retained. In line with our earlier submission, we would like to see the sections strengthened as follows:

• DM36 should contain stronger and clearer wording to state explicitly that it is incumbent on the applicant to demonstrate clearly that the public interest will be best served by the new development going ahead. Wording such as "The council will consider any wider public benefits which may flow from the development and the case for these in the impact assessment will need demonstrably to outweigh any detrimental effects of the loss of the asset".

• We continue to believe strongly that the third paragraph of DM38 makes little sense as currently drafted. If the applicant cannot demonstrate substantial public benefits it is not clear why the proposal would be considered at all. As noted in our earlier submission, the whole policy statement would be clearer and stronger if re-cast along the following lines:

○ Existing para 1

○ Existing para 2

○ Para 3 recast along the lines of: "in weighing the balance of the potential public benefits and the potential loss of the assets concerned or harm to them, account will be taken of ... [items a-e]"

○ New para: "It will be incumbent on the applicant to demonstrate that the public benefits clearly outweigh the potential loss of the asset or harm to it"

○ Existing paras 4-8

rs sincerely

Paul Wright