



**Local Development Framework  
Issues and Options  
Public Consultation Summary  
PART 2**

**London Borough of Lewisham  
Planning Policy  
April 2007**

## Contents

Introduction	Page 3
Consultation Process	Page 4
Methodology Consultation	Page 5
Summary of Questionnaire Responses	Page 8
Summary of Written Responses	Page 28
Next Stage	Page 182
Appendix1 – Summary of Planning Focus Meetings	Page 183

## Introduction

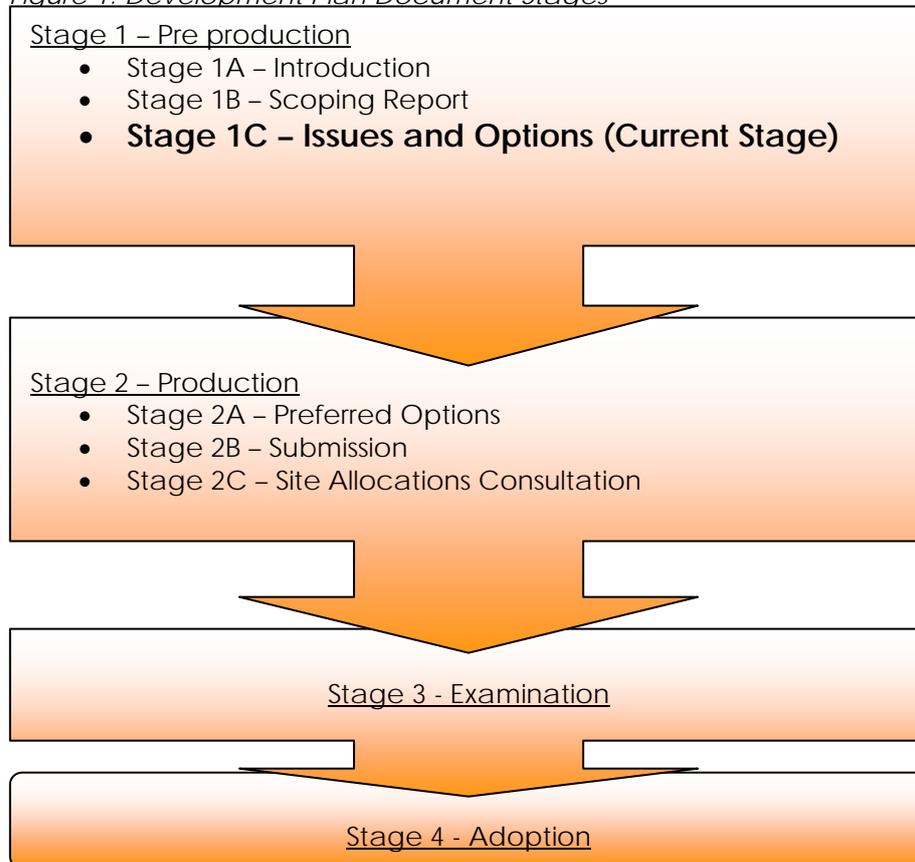
This report forms as a summary of the responses received from consultees during the public consultation period of the London Borough of Lewisham Local Development Framework Issues & Options Paper part 2, during 12<sup>th</sup> September 2005 – 24<sup>th</sup> October 2005.

A summary of the options together with a response questionnaire were provided to enable the public to understand what the prevailing issues in the borough are, present the options to remedy the issues in a straightforward manner and allow for a convenient way to respond.

This report has been prepared in conjunction with the Statement of Community Involvement whose purpose it is to explain and demonstrate to the public how the Council will carry out consultation on various issues including the Local Development Framework.

This stage represents Stage 1c (Pre- Production) of the Local Development Framework process as set out in the adopted Statement of Community Involvement. The Statement of Community Involvement explains how the community can be actively involved in planning in Lewisham and details how the community can make a change to places where they live, work and visit. The Issues and Options stage was the first stage in the preparation of the development plan documents, this is detailed in figure 1 below. The Issues and Options stage involved asking the community about what issues felt important to them and what direction they thought the local planning authority should adopt. Gathering facts and figures (known as the evidence base) helped the process by being able to rely on up to date and accurate information which has helped in developing the issues in the borough and the potential options to address the issues.

*Figure 1. Development Plan Document Stages*



## Consultation Process

The Issues and Options papers cover ten (10) topics as set out below. The Council has consulted on these matters in four parts, to spread out the amount of information exhibited. The public consultation period for each of the Parts took place over a 6 week period, in accordance with Regulation 25 of the Planning & Compulsory Purchase Act (2004).

The topics covered and their consultation periods is as follows:

### Part 1:

Consultation period: 25<sup>th</sup> July – 12<sup>th</sup> September 2005

- Housing
- Urban Design and Conservation
- Sustainable Environment
- Waste Management

### Part 2:

Consultation period: 12<sup>th</sup> September 2005 – 24<sup>th</sup> October 2005

- Open Space and Biodiversity
- Employment
- Transport

### Part 3:

Consultation period: 10<sup>th</sup> October – 21<sup>st</sup> November 2005

- Retail and Town Centres
- Site Allocations

### Part 4:

Consultation period: 26<sup>th</sup> October – 30<sup>th</sup> November 2005

- Community Facilities, Health & Education

## Methodology of Consultation

The Council undertook an extensive public consultation program that used all available medians to engage the public with the LDF Issues & Options. A total of 1400 individuals, groups, associations and government agencies and 'specific consultation bodies' were consulted during the process.

The contact list for the public consultation exercise was comprised of a list generated from the existing Unitary Development Plan in combination with a new list of consultees generated early in the LDF consultation process, along with any other consultees that responded to any of the LDF documents that were publicly exhibited prior the Issues and Options stage.

A list of the Specific Consultation Bodies that were consulted, as required by the Regulations is provided in Appendix 2. A list of all the General Consultation groups that were consulted has been provided in Appendix 3. These appendices can be found as separate documents.

The following medians were utilised during the public consultation process:

### Internet:

The Council posted all the Issues & Options documents including questionnaires on the Council's website:

<http://www.lewisham.gov.uk/Environment/Planning/PlanningPolicy/LocalDevelopmentFramework/LDFConsultation/>

### Telephone:

The Council provided four contact numbers to enable the general public to contact the Council's Planning Policy team throughout the public exhibition process.

### Visitation:

The Council made available all the Issues and Options documents for public viewing at all the borough libraries and the Planning Information Office.

### Diversity Case Study:

In 2005 Lewisham Council joined the international 'Intercultural City' project which was launched in 2004 by COMEDIA with core funding from the Roundtree Foundation. The Intercultural City is a project with case studies all over the world which seeks to better understand the value of cultural diversity and the benefits of cross cultural interaction in cities.

In September 2005 phase 1 of the Lewisham case study was undertaken with the aim of examining:

"...how local development studies and masterplanning techniques can be enhanced and developed in order to better meet the needs of an increasingly diverse community. This focus on masterplanning will also help to consider how Lewisham can make the most out of new development opportunities for the benefits of the wider and increasingly diverse community."

The work is due to be completed at the end of February 2007 and will be available on the Council website and hard copies made available.

### Planning Focus Meetings:

The Council undertook planning focus meetings, specifically targeting 'active community groups' and 'hard to reach' groups. The planning focus meetings enabled the Councils

Policy Planners to engage with the public in an informal and interactive arrangement. The following meetings took place:

<b>Group:</b>	<b>Date:</b>
Deptford Business Forum	23 August 2005
Conservation and Amenity Groups	17 October 2005
Faith Groups	16 November 2005
Older People	21 October 2005
Ethnic Minorities	21 October 2005
Lewisham Disability Coalition	12 December 2005

Council officers also attended a meeting with the Mayor's Commission for Developing a Sustainable Environment on the 27<sup>th</sup> November 2006.

A summary of the comments provided in these meetings is provided in Appendix 1.

**LDF Newsletter:**

The Council produced two (2) Newsletters, providing the public with a summary and update on the Issues and Options stage of the Local Development Framework. The LDF Newsletter was sent out to all the consultees as discussed above.

**Mail Drop:**

A letter was sent to all the Specific Consultation Bodies, identified in Appendix 2 as well as the General Consultation groups, identified in Appendix 3.

Additionally, the Council wrote to 728 premises located within the Council's Defined Employment Areas under the Unitary Development Plan, informing that the Issues and Options papers for Employment Land and Site Allocations were available for review and comment.

The Council received a total of 521 responses during the public consultation process .

The following number of responses were received for each Part:

<b>Part:</b>	<b>Number of Responses:</b>
<b>Part 1</b>	66
<b>Part 2</b>	74
<b>Part 3</b>	349
<b>Part 4</b>	32
<b>TOTAL</b>	<b>521</b>

The responses can be split up into two categories; (A) Questionnaire responses, including responses from the Specific Consultation body submissions and (B) Written responses, forming the majority of the responses received.

## SUMMARY OF QUESTIONNAIRE RESPONSES

The Responses received may have inaccurate readings, this is mainly due to uncompleted forms and respondents providing written responses as opposed to filling out the feedback consultation sheet. The policy direction will be explained further in the preferred options document.

### OPEN SPACE & BIODIVERSITY

Question 1: Have we addressed all the relevant issues?

Answer:	No. of Responses:
Yes	3
No	3

What other issues have we not covered in relation to open space and biodiversity?

- *Council needs to think globally.*
- *Flooding - Important to recognise natural zones.*
- *Develop strategies to encourage good usage of private garden space.*
- *No mention of the need to identify, protect and improve historic designed landscapes (inc parks and cemeteries) of national and local importance.*

Question 2: Have we proposed the most appropriate options?

Answer:	No. of Responses:
Yes	3
No	0

Question 3: What are the views on the Options presented?

- *Support Option 1.2.*
- *Support Option 3.2.*
- *Support Options 1.1, 2.1, 2.2, 3.1, 3.2, 3.3, 3.4, 4.3, 4.4, 4.5, 5.1, 5.2.*
- *Do not support options 1.2 or 1.3.*
- *Option 1 in each issue should be recommended.*
- *Increased density of use/occupation will off set any increase of open space.*  
*2.2/2.4/2.6/2.8.*

### TRANSPORT & PARKING

Question 4: Have we addressed all the relevant issues?

Answer:	No. of Responses:
Yes	4
No	1

What other issues have we not covered in relation to transport and parking?

- *Extending and enhancing walking routes.*

Question 5: Have we proposed the most appropriate options?

Answer:	No. of Responses:
Yes	3
No	1

Question 6: What are your views on the Options presented?

- *Do not agree with Option TR1. Support Options TR2,3,4,12,15,16,17 & 18*
- *Agree to Option 16 & 18*
- *Prefer Option TR1*
- *Issue 4 most important.*

## EMPLOYMENT LAND

Question 6: Have we addressed all the relevant issues?

Answer:	No. of Responses:
Yes	3
No	2

What other issues have we not covered in relation to Employment Land?

- *Provision to allow for small non-polluting industries in residential areas.*
- *Consideration should be given to long term use of live/work units - How can Council enforce their usage as such often 2/3 changes of ownership - say in 10 years?.*

Question 7: Have we proposed the most appropriate options?

Answer:	No. of Responses:
Yes	3
No	0

Question 8: What are your views on the Options presented?

- *Agree to E2,DEA3, DEA5,DEA7,OTH2, OTH3,OFF4. Do not agree to DEA1, LW1.*
- *Option 5 would allow more flexibility.*
- *More emphasis need on promoting and protecting affordable housing.*
- *Encourage properly serviced facilities where self employment can flourish.*

## TRANSPORT

### Issue 1: Location & Accessibility

Option TR1. Allow higher density development only in places where good public transport is available and restrict development in places with poor public transport.

Question 1: Do you agree with Option TR1?

Answer:	No. of Responses:
Yes	12
No	5

Question 2: Do you support the use of PTAL Maps?

Answer:	No. of Responses:
Yes	9
No	3

Question 3: Can you suggest some other criteria?

- *Walking Time x 3.*
- *Connect transport flows to traffic usage.*

- *Potential to improve public transport should also be considered.*

Question 1: Do you prefer Option TR2 or TR3?:

Answer:	No. of Responses:
TR2 - Require transport assessment/travel impact statements for all new developments.	4
TR3 - Set thresholds for development that will be required to submit travel impact statements.	10

Question 2: Should the thresholds be based on such things as gross floor space or number of residential units. For example, all development over 1000 square meters or 15+ residential units?

Answer:	No. of Responses:
Yes	10
No	2

Question 3: Can you suggest another way to deal with this issue?

- *Thresholds dependant on use x 2.*
- *Assess all travel modes in relation to development.*
- *Recommend thresholds are set for developments that require the submission of Transport Assessments, but that a Travel Plan Framework is prepared as part of a planning application to represent a Statement of Intent and the final presentation of the Travel Plan be a condition of the planning approval.*

Question 1: Option TR4. Require green travel plan for large scale developments or developments which will generate a 'significant' amount of movement. Do you support this option?

Answer:	No. of Responses:
Yes	12
No	1

Question 2: Should the Council seek to require GTPs or merely encourage them?

Answer:	No. of Responses:
Require	8
Encourage	3

Question 3 Can you suggest a threshold for qualifying planning applications, for example, based on size of development in square meters or number of people employed?

- *Number employed being 15.*
- *Number employed being 5.*
- *Number employed being 20.*
- *Thresholds dependant on use.*
- *Council should have flexibility to require a GTP.*

Question 4: Can you suggest another way to deal with this issue?

- *Number of visitors x 2*
- *Thresholds dependant on use*

Question 1: Do you prefer Option TR5 or TR6?

Answer:	No. of Responses:
TR5 - Require developers to contribute to public transport infrastructure where deficiencies are identified.	8
Option TR6 - Require developers only to meet the immediate transport improvements related to their development.	10

Question 2: Can you suggest an alternative option?

- *Pool funding.*
- *TR5 has hidden tax implications. Transport infrastructure should be developed in line with demand.*
- *Improve public transport.*

## Issue 2: Traffic Management and Road Safety

Question 1: Option TR 7. Manage and distribute traffic in accordance with the road hierarchy established in the Unitary Development Plan. Do you support this option?

Answer:	No. of Responses:
Yes	12
No	1

Question 2: Do you think the road hierarchy is too rigid for managing traffic problems?

Answer:	No. of Responses:
Yes	3
No	7

Question 3: Do you have an alternative?

- *Connect with Traffic Flows*
- *Roads to be assessed for their designed usage*
- *Improved management of traffic*

Question 1: Option TR8. Introduce engineering, education and enforcement measures to improve road safety. Do you support this option?

Answer:	No. of Responses:
Yes	11
No	2

Question 2: Do you have an alternative?

- *Different methods to cut down speed & traffic volumes.*
- *Improve quality and education of transport engineers.*
- *Education.*

## Issue 3: Parking Control

Question 1: Which option do you prefer?

Answer:	No. of Responses:
Option TR9 - Continue to use the UDP Car parking standards for new development proposals	6
Option TR10 - Require developers only to meet the immediate transport improvements related to their development	4
Option TR11 - Introduce some other car parking standards	3

Question 2 Do you support the link between public transport provision and car parking provision?

Answer:	No. of Responses:
Yes	9
No	3

Question 3: Do you think retail and town centres can only flourish if adequate car parking is provided?

Answer:	No. of Responses:
Yes	7
No	5

Question 4: Is there a case for less restrictive car parking to assist regeneration areas?

Answer:	No. of Responses:
Yes	7
No	4

Question 5: Should business have separate operational parking standards?

Answer:	No. of Responses:
Yes	6
No	3

Question 1: Which option do you prefer?

Answer:	No. of Responses:
Option TR12. Require specific cycle provision as part of all developments	6
Option TR13. Negotiate cycle provision on an individual basis	8

Question 1: Which option do you support?

Answer:	No. of Responses:
Option TR14. Promote car-free residential development in areas with excellent public transport facilities	7
Option TR15. Insist on some minimum parking provision in relation to all residential development	6

Question 2: Should a threshold of residential development be set above which some provision would be required, for example 5+ dwellings?

Answer:	No. of Responses:
Yes	4
No	10

Question 1: Option TR17. Require Developers to contribute towards the implementation of CPZs. Do you support this option?

Answer:	No. of Responses:
Yes	6
No	4

#### Issue 4: Promotion of Public Transport Facilities

Question 1: Option TR18. The Council will encourage the safeguarding of transport facilities through avoiding inappropriate development. Do you agree with option TR 18?

Answer:	No. of Responses:
Yes	13
No	1

Question 2: Can you suggest other ways for the Council to safeguard essential transport facilities?

- *Monitoring.*
- *Change of use development.*

Question 1: Do you support the following options:

Option TR19. The Council will support and promote public transport improvements.

Option TR20. The Council will support rail and other transit improvement schemes that benefit local residents, subject to acceptable environmental impacts, in particular;

- East London Line Extension Phase 2.
- Extension of DLR from Lewisham to Catford.
- DLR 3 Car Capacity Enhancement.
- Extension of the Croydon Tramlink to Lewisham.
- Extension of the Greenwich Waterfront Transect to Canada Water.
- Orbital Rail Route Improvements.

Answer:	No. of Responses:
Yes	14
No	0

Question 2: How else could policy reflect an intension to support public transport improvements?

- *Increase bus lanes & Restrict cars using Town Centre*
- *Support Extension to East London line to Clapham Junction. Support re-opening of Brockley High Level Station.*
- *Walking and cycling improvements should be key in all new developments*
- *Option TR20 could be amended to read: "Extension of DLR from Lewisham to Catford, and station improvements at Catford."*

#### OPEN SPACE

##### Issue 1: Open Space Provision – Dealing with deficiencies

Question 1: Do you agree with the Core Strategy approach in 1.1?

Answer:	No. of Responses:
Yes	11
No	2

Question 2: Which target for open space provision do you prefer?

Answer:	No. of Responses:
(1.1) 1.7/1000 average with aim to increase	10
(1.2) maintain existing	1

(1.3) only over areas of deficiency	3
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Other suggestions?

- *Defunct employment land could be utilised as public open space.*
- *Policy 1.3 should be considered wherever opportunities arise to create open space.*
- *Options provided conflict with density plans. Density plans are not viable.*
- *Create open space around main and non-main rivers. This would be backed up by the Water Framework Directive. The environment agency would like to see buffer zones on main rivers reaching 16m in tidal areas, and 8m in non-tidal rivers, plus 5m for non-main rivers. The Environment Agency would also like to encourage where possible, access down to waterways.*

## Issue 2: Protection and Enhancement of Open Space & avoiding inappropriate development

Question 3: Which Core Strategy Option is most appropriate for Lewisham?

Answer:	No. of Responses:
2.1: Protect and take opportunities to enhance	3
2.2: Protect and seek new opportunities to enhance	13

Question 4: Which of the proposed options do you think are best to protect and enhance open space?

Answer:	No. of Responses:
2.1: Refuse planning permission in OS (if bad effects on OS)	7
2.2: Refuse planning permission nearby OS (if bad effects on OS)	7
2.3: Refuse planning permission nearby MOL (if bad effects on MOL)	8
2.4: Criteria based approach for UGS	4
2.5: Require new development to set aside 1.7ha/1000 population	5
2.6: Development contributions	3
2.7: Negotiate to open up private land to public	5
2.8: Assess potential brownfield sites	8

Other suggestions?

- *Land adjacent to railway lines.*
- *Future Policy should allow for individual sites and proposed developments to be assessed on their individual merit, as well as within a defined set of broad perimeters.*
- *Long term brownfields sites will be reclaimed by nature - There is no reason why developers should not be expected to provide management for what could become new nature conservation areas within a developed site as part of landscaping & site maintenance.*
- *Suggest TPOs.*
- *\*Ref Opt 2.5 - Undertake more flexible approach, as 1.7ha/1000 will not be achievable on all developments. \* Ref Opt 2.6 - Circular 05/2005 on Planning Obligations makes it clear that obligations should not be sought to resolve existing deficiencies and must be clearly related to the development proposed. The Development Framework should make it clear that contributions will only be sought where the need arises as a result of the development proposed.*

## Issue 3: Quality and Maintenance

Question 5: Do you support the Core Strategy approach in 3.1?

Answer:	No. of Responses:
Yes	11

No	0
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Question 6: Which option/s do you think best deals with quality and maintenance of open space?

Answer:	No. of Responses:
3.1: Actions of Open Space Strategy	7
3.2: Setting quality standards	5
3.3: No development in areas of deficiency if accessibility affected	5
3.4: Development contributions	3

Other:

- *Allow a more unilateral approach to maintenance of open spaces.*
- *Opt 3.4 is too limited as improving the quality of open space should not just be limited to areas of deficiency as existing open space could be poor.*

#### Issue 4: Natural Habitats and Biodiversity

Question 7: Do you agree with the Core Strategy policy direction 4.1?

Answer:	No. of Responses:
Yes	12
No	1

Question 8: Which options do you favour to protect natural habitats and biodiversity?

Answer:	No. of Responses:
4.1	1
4.2: Adopt target in Open Space Strategy	7
4.3: Allow developments seeking conservation benefits	7
4.4: Naturalisation of waterways and esplanades	9
4.5: Green building methods	9
4.6: Planning permission granted only where compensation or mitigation is offered	3
4.7: Consideration of alternatives	4

Other:

- *Encourage green building methods*

#### Issue 5: Protection and enhancement of links and corridors

Question 9: Do you support the Core Strategy policy direction in 5.1?

Answer:	No. of Responses:
Yes	10
No	1

Question 10: Which, if any, of the options regarding Protection and Enhancement of Links and Corridors do you support?

Answer:	No. of Responses:
5.2: Planning permission granted only where compensation or mitigation is offered	8
5.3: Only allow development on proposed 'Waterlink Way' route if it enhances recreation or biodiversity	8
5.4: Encourage naturalisation of waterways	9

Other suggestions:

- *Railway embankments to be used as biological corridors.*
- *Demographics & climate change means that all developments should be considered as to long term effects.*
- *People require maximum Open Space and proximity to Biodiversity reserves.*

## EMPLOYMENT

### Issue 1: Options for protecting employment land: Strategic employment locations

Question 1: Option E1 Do you think that the current boundaries of the Strategic Employment Locations should be maintained?

Answer:	No. of Responses:
Yes	3
No	2

Reasons:

Yes:

- *Providing the boundaries are previewed to ensure there are no appropriate sites should be removed/added.*
- *Boundaries should remain unchanged.*

No:

- *Unrealistic to set boundaries in stone. Should be adjusted as circumstances change.*

Question 2: Option E2 Do you think that the boundaries to the Strategic Employment Locations should be reviewed by the addition and/or removal of sites (Option No E2)?

Answer:	No. of Responses:
Yes	3
No	3

Reasons:

Yes:

- *There may be a need to make adjustments but the overall proportion of land for strategic employment purposes should not be diminished.*
- *Option recognises that some existing employment sites have outlived their usefulness in terms of providing sustainable employment opportunities and, perhaps resulting from a change of circumstances in adjoining areas, would be better used for other purposes.*

No:

- *Protect SME & Creative Sector.*

Question 3: If you think that some of the sites should be removed from the Strategic Employment Locations which uses would you prefer to see on those sites?

- *Review as circumstances and priorities change.*
- *Open Space provisions in areas of Deptford*

### Issue 2: Options for protecting employment land: Defined Employment Areas

Question 4: Option DEA 1 Do you think that all the currently protected Defined Employment Areas should remain in Employment Use ?

Answer:	No. of Responses:
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Yes	0
No	5

Question 5: Option DEA 2 Do you think that the Council should remove protection from these employment sites and allow their redevelopment for other uses?

Answer:	No. of Responses:
Yes	2
No	3

Question 6: Do you think that the decision to retain a Defined Employment Area in employment use should be taken on an individual basis dependent on the physical quality of the site and its value in enhancing the local economy and for providing jobs (Option DEA 3)?

Answer:	No. of Responses:
Yes	6
No	0

Reasons for your answers to Questions 4 to 6:

- *Option would allow the removal of some sites from the DEA designation, depending on certain criteria, to be favoured option, particularly in the north of the Borough, where pressure for development is at its greatest and where the opportunity for regeneration of deprived areas is also at its greatest.*
- *DEA's appear to be under utilised and better use could be made of the space for housing.*

Question 7: How would you judge the worth of an employment site?

- *Demand*
- *Number of Employees.*

### Issue 3: Alternative uses in defined employment area

Question 6: The following options deal with general preferences for the use of Defined Employment Areas should the decision be taken to allow for redevelopment. Which is your preferred option?

Answer:	No. of Responses:
Option DEA 4 Allows 100 % residential development	2
Option DEA 5 Allows for mixed use commercial and residential development with a proportion of affordable housing and community facilities	6
Option DEA 6 Proposes that development on former Defined Employment Areas should be 100% Affordable Housing	2

Other suggestions:

### Issue 4: Creation of new business floorspace

Question 11: Option DEA 7: Do you think that when employment areas are developed for other uses developers should make 'planning contributions' to fund affordable replacement employment floorspace?

Answer:	No. of Responses:
Yes	2

No	2
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### Issue 5: Other Employment Sites

Question 12: Option OTH 1 Do you think that all the smaller employment sites in the Borough should be preserved in business/industrial use?

Answer:	No. of Responses:
Yes	1
No	5

Question 13: Option OTH 2: Do you think that the Council should allow redevelopment of all the smaller employment sites in the borough for mixed use commercial and housing or 100% housing?

Answer:	No. of Responses:
Yes	1
No	5

Question 14: Option OTH 3 Do you think that these sites should be assessed individually depending on their physical quality and usefulness to the local economy?

Answer:	No. of Responses:
Yes	5
No	0

Reasons:

- *Consider on individual merits.*
- *Prefer Option OTH 3 - Would allow each site to be judged individually, and which would allow a structured release of land to meet housing and other needs.*
- *Smaller sites should be retained, but there may be good reasons for change of use in some circumstances.*

### Issue 6: Office Development

Question 16: Option OFF 1. Do you agree that larger office development should be directed to Lewisham and Catford Town Centres with smaller scale offices generally acceptable in other locations (smaller town centres and ancillary to employment uses)?

Answer:	No. of Responses:
Yes	5
No	0

Other suggestions:

- *No Response.*

### Issue 7: Employment clusters and creative industries

Question 17: Option CRE 1 The Council is proposing to identify 'Creative Quarter' where the Council will encourage creative enterprises. Do you think that this would act to preserve or create affordable workspace for creative industries?

Answer:	No. of Responses:
Yes	5
No	0

## Issue 8: Live/Work Developments

Question 18: Option LW 1 This proposes that Live/work developments are welcome in Town Centres and other shopping locations and will be restricted in Employment Areas. Do you agree with this policy?

Answer:	No. of Responses:
Yes	3
No	1

Question 17: Option LW2 Do you think that Live/work developments should only be acceptable in older workshop/warehouse buildings to ensure continued use?

Answer:	No. of Responses:
Yes	1
No	2

Question 18: Option LW 3 proposes that these developments should be refused planning permission in favour of 100% residential or mixed use commercial and residential. Do you agree?

Answer:	No. of Responses:
Yes	1
No	2

## DEFINED EMPLOYMENT AREAS

### Blackheath Hill Defined Employment Area

Question 1: Should employment protection for this site be maintained?

Answer:	No. of Responses:
Yes	1
No	0

Question 2: Please state the reasons for your choice:

No Response.

Question 3: If you think the site should no longer be protected what alternative uses would you consider?

No Response.

### Clyde Vale/Perry Vale Defined Employment Area

Question 1. Should employment protection for this site be maintained?

Answer:	No. of Responses:
Yes	1
No	1

Question 2: Please state the reasons for your choice:

Yes:

- *Good Transports links.*

No:

- *Spatial development would allow for retail/commercial below & housing above.*

*Question 3:* If you think the site should no longer be protected what alternative uses would you consider?

Answer:	No. of Responses:	Reasons:
100% Housing	0	
100% Affordable Housing	0	
Mixed Use 50% Affordable Housing & 50% Commercial	1	<i>Plenty of scope for development for both commercial &amp; housing</i>
Other	0	

### **Creekside Defined Employment Area**

Question 1: Should employment protection for this site be maintained?

Answer:	No. of Responses:
Yes	1
No	0

Question 2: Do you think that just part of the area should be released from employment use. If so which part of the Area?

No Response.

Question 3: Reasons:

No Response.

*Question 4:* Do you think that the area provides important premises for the nucleus of creative industries at this location being promoted by the Council?

Answer:	No. of Responses:
Yes	1
No	0

Question 5: If you think the site/ or part of the site should no longer be protected what alternative uses would you consider?

Answer:	Number of Responses:	Reasons:
100% Housing	0	
100% Affordable Housing	0	
Mixed Use 50% Affordable Housing & 50% Commercial	1	<i>Sensible compromise</i>
Other	0	

### **Endwell Road Defined Employment Area**

Question 1. Should employment protection for this site be maintained?

Answer:	No. of Responses:
Yes	0
No	1

Question 2: Please state the reasons for your choice.

- *Need employment.*

Question 3: If you think the site should no longer be protected what alternative uses would you consider?

No Response.

### **Evelyn Street Defined Employment Area**

Question 1: Should employment protection for this site be maintained?

Answer:	No. of Responses:
Yes	1
No	1

Question 2: Please state the reasons for your choice.

Yes: *Need Employment*

No: *Advantages in mixed use development.*

Question 3: If you think the site should no longer be protected what alternative uses would you consider?

Answer:	No. of Responses:
100% Housing	0
100% Affordable Housing	0
Mixed Use 50% Affordable Housing & 50% Commercial	1
Other	0

Please give the reasons for your choice:-

- *Advantages in mixed use development include:*
- *3 times as many jobs would be created as currently exist on the site by providing modern Class B1 office and workshop sites.*
- *Additional 600 dwellings (inc 180 affordable dwellings),*
- *Green corridors linking the site and Evelyn St to the areas to the north & east,*
- *Opportunity to 'mend' the environment of this otherwise 'run-down' site.*

### **Goodwood Road Defined Employment Area**

Question 1: Should employment protection for this site be maintained?

Answer:	No. of Responses:
Yes	2
No	1

Question 2: Please state the reasons for your choice.

Yes:

- *Already in mixed use, heavily biased to residential, but full capacity of business units.*
- *Need to keep trades local to London.*

No:

- *Problem with lorries delivery goods.*

Question 3: If you think the site should no longer be protected what alternative uses would you consider?

Answer:	No. of Responses:
100% Housing	1
100% Affordable Housing	0
Mixed Use 50% Affordable Housing & 50% Commercial	0
Other	0

Please give the reasons for your choice:-

No Response.

### **Malham Road Defined Employment Area**

Question 1: Should employment protection for this site be maintained?

Answer:	No. of Responses:
Yes	2
No	0

Question 2: Please state the reasons for your choice.

- *Extensively used by business.*

Question 3: If you think the site should no longer be protected what alternative uses would you consider?

No.

### **Manor Lane Defined Employment Area**

Question 1: Should employment protection for this site be maintained?

Answer:	No. of Responses:
Yes	3
No	0

Question 2: Reasons.

- *Extensively used by business.*

Question 3: If you think the site should no longer be protected what alternative uses would you consider?

No Response.

### **Molesworth Defined Employment Area**

Question 1: Should employment protection for this site be maintained?

Answer:	No. of Responses:
Yes	1
No	0

Question 2: Please state the reasons for your choice.

- *Suitable.*

Question 3: If you think the site should no longer be protected what alternative uses would you consider?

No Response.

#### **Plough Way Defined Employment Area**

Question 1: Should employment protection for this site be maintained?

Answer:	No. of Responses:
Yes	2
No	0

Question 2: Please state the reasons for your choice.

- *Area in full use.*

Question 3: If you think the site should no longer be protected what alternative uses would you consider?

- No Response.

#### **Stanton Square Defined Employment Area**

Question 1: Should employment protection for this site be maintained?

Answer:	No. of Responses:
Yes	4
No	0

Question 2: Please state the reasons for your choice.

- *This is an introduced 'island site' and not suitable for usage other than employment.*

Question 3: If you think the site should no longer be protected what alternative uses would you consider?

No Response.

#### **Willow Way Defined Employment Area**

Question 1: Should employment protection for this site be maintained?

Answer:	No. of Responses:
Yes	1
No	1

Question 2: Please state the reasons for your choice.

Yes: *Suitable.*

No: *This area is only suitable for employment purposes.*

Question 3: If you think the site should no longer be protected what alternative uses would you consider?

No Response.

### Worley Bridge Road Defined Employment Area

Question 1: Should employment protection for this site be maintained?

Answer:	No. of Responses:
Yes	3
No	0

Question 2: Please state the reasons for your choice.

- *Car park is vital for business and has continuous comings and goings through the working day.*

Question 3: If you think the site should no longer be protected what alternative uses would you consider?

No Response.

## STRATEGIC EMPLOYMENT LOCATIONS

### Issue 1: Strategic Employment Locations

Question 1: The Council is proposing to retain a set of core sites to form the Strategic Employment Location at Surrey Canal Road. Do you agree that these sites should be retained in industrial/commercial/waste transfer use?

Answer:	No. of Responses:
Yes	3
No	4

Question 2: If your answer to Q1 is no please state what other uses for these sites you would propose ?

- *Community; Commercial; Open Space; Residential; Creative Industries; Light Industrial*

Question 3. A local resident suggests that part of the railway lands at Coldharbour Lane which the Council is proposing to retain in industrial/commercial use should be redeveloped for housing. What do you think of this suggestion?

- *Agree x 2.*
- *Better to be redeveloped as community uses/Open Space if it is certain not to be further use as employment land.*

Question 4: The Council has proposed various options for the use the following sites in the Surrey Canal Road Location. We would like to receive your views on these:

### Rollins Street/Stockholm Road

Please state which option or combination of options you prefer.

Answer:	No. of Responses:
Option ROLL 1 - Mixed Use Commercial/Residential/Live Work on	1

Excelsior, employment uses retained a Stockholm Road and Rollins Wharf	
Option ROLL 2 - Allocate land for housing and community use	3
Option ROLL 3 - Retain employment uses	2
Option ROLL 4 - Waste Management	1

Other suggestions: No Response.

### Orion Business Centre/Surrey Canal Road

Please state which option or combination of options you prefer.

Answer:	No. of Responses:
Option ORION 1 - Retain employment uses	1
Option ORION 2 - Allocate land for housing and community use	0
Option ORION 3 - Mixed Use Employment and Housing	3
Option ORION 4 - Waste Management	1

Other suggestions: No Response.

### Oxestalls Road Area

Please state which option or combination of options you prefer.

Answer:	No. of Responses:
Option OXE 1 - Retain employment uses	2
Option OXE 2 - Allocate land for housing	3
Option OXE 3 Mixed Use – Employment and Housing, Community Use	7
Option OXE 4 - Waste Management	1
Option OXE 5 - This option was suggested by the landowners for Bridge Wharf and Victoria Wharf- mixed use high density residential development which would provide more jobs than currently exist on site	3

Other suggestions: No Response.

### Childers Street Area

Please state which option or combination of options you prefer.

Answer:	No. of Responses:
Option CHI 1 - Retain current employment uses on site	1
Option CHI 2 - Allocate land for housing	0
Option CHI 3 - Mixed Use employment and Housing	0
Option CHI 4 - Mixed use employment/Live Work Units, Housing	4

Other suggestions: No Response.

### Arklow Road Area

Answer:	No. of Responses:
Option ARK 1 - Retain current employment uses on site	1
Option ARK 2 - Allocate land for housing and community facility	0
Option ARK 3 - Mixed Use employment and Housing	1
Option ARK 4 - Mixed use employment/Live Work Units, Housing	3
Option ARK 5 - The owners of the site have proposed that the	4

'Donway Building' on this estate should be redeveloped and comprise a B1 employment space and live/work units in a single building. They also propose that the Arklow Road Trading estate should be redeveloped to comprise B1 employment space and 'mixed tenure' housing (i.e. with a proportion of affordable housing).	
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Comments: No Response.

**Issue 2: Bromley Road Strategic Employment Location**

**Bellingham Trading Estate, Franthorne Way**

Please state which option or combination of options you prefer:

Answer:	No. of Responses:
1. Continuation in employment use	2
2. Waste processing	1
3A. Promotion of housing	0
3B. Mixed use commercial and housing	0
3C. Other Use (please state)	0

**Catford Bus Garage**

Please state which option or combination of options you prefer:

Answer:	No. of Responses:
1. Continuation in employment use	1
2. Waste processing	1
3A. Promotion of housing	0
3B. Mixed use commercial and housing	0
3C. Other Use (please state)	0

**Initial Textile Services**

Please state which option or combination of options you prefer:

Answer:	No. of Responses:
1. Continuation in employment use	1
2. Waste processing	1
3A. Promotion of housing	0
3B. Mixed use commercial and housing	0
3C. Other Use (please state)	1

**Police Garage Aitken Road**

Please state which option or combination of options you prefer:

Answer:	No. of Responses:
1. Continuation in employment use	2
2. Waste processing	2
3A. Promotion of housing	0
3B. Mixed use commercial and housing	0
3C. Other Use (please state)	1

**Depot, Fordmill Road**

Please state which option or combination of options you prefer:

Answer:	No. of Responses:
1. Continuation in employment use	2
2. Waste processing	1
3A. Promotion of housing	0
3B. Mixed use commercial and housing	1
3C. Other Use (please state)	0

**Corner Site Randlesown Road and Bromley Road**

Please state which option or combination of options you prefer:

Answer:	No. of Responses:
1. Continuation in employment use	1
2. Waste processing	0
3A. Promotion of housing	0
3B. Mixed use commercial and housing	0
3C. Other Use (please state)	1

The owner of part of this site has proposed that Nos. 206-210 Bromley Road should be used for a high density residential development due to the proximity of the site to Bellingham Railway Station and bus routes.

**Written Responses (only summary of main points) & Officer recommendations**

Part 2

- Open Space and Biodiversity
- Employment
- Transport

Part 2

# OPEN SPACE & BIODIVERSITY

LIST OF RESPONDENTS FOR **OPEN SPACE** ISSUES AND OPTIONS CONSULTATION

RESPONDENTS IDENTIFICATION NUMBER	RESPONDENT
10	Deidre Mason Honor Oak Park Assoc
18	Susan Gore, Ladywell Society
19	Georgie Cook, Thames Water Property Services
20	Env. Sub Committee, Grove Park Community Group
21	Andrew Reid, on behalf of Tewkesbury Lodge Estate
22	Laura Graham, Cluttons
26	G. Rowlands, 51 Upwood Road
27	Anonymous
29	Tim Wild, Sydenham Citizens Advice Bureau
30	C V Sayers, 71 Leyland Road
42	Pat Trembath Sydenham Society
49	Peter Richardson, The Users & Friends of Manor House Library
57	Paula Carney, RPS Planning
61	Linden Groves, Garden History Society
64	Michelle Barry, RPS group
65	Cllr Robert Massey, London Borough of Lewisham
66	Christine McGoldrick, Strategic Planning Manager, Greater London Authority
71	Fiona McNie, Environment Agency

## Schedule of Representations

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
10	Deidre Mason	Honor Oak Park Assoc	Main Issues Raised:	Open space should not be encroached on by development.	Agree, policy will be worded to reflect this stance.	No changes made
10	Deidre Mason	Honor Oak Park Assoc	Main Issues Raised:	Parks need a more visible presence in the form of attendants.	Comments noted	Seek improvements in the way the Council manages its parks
10	Deidre Mason	Honor Oak Park Assoc	Main Issues Raised:	Natural habitats and biodiversity that reflect the local ecology and that are managed so as not to become "cover" for vandalism and anti-social behaviour would add to the neighbourhood	Agree, this will be encouraged within the core strategy.	Add more strength to natural habitats and biodiversity within the core strategy.
18	Susan Gore	Ladywell Society	Issue 2: Protection & Enhancement of Open Space & Avoiding Inappropriate Development	Land adjacent to railway lines	Many of Lewisham's railway corridors have some level of protection. It is proposed within the policy that all open space regardless of ownership is protected.	No changes made
18	Susan Gore	Ladywell Society	Issue 5: Protection & Enhancement of Links & Corridors	Railway embankments to be used as biological corridors.	Agree, policy will be worded to reflect this stance.	No changes made

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
19	Georgie Cook	Thames Water Property Services	Main Issues Raised:	Thames Water do object in principal to the aim of protecting and increasing the provision of all types of Open Space. However, unnecessary constraints should not be placed on Thames Water operational water or sewerage sites. If an operational site were to be designated as a protected open space this would restrict future operational development at the site which may be necessary to service development to avoid unacceptable environmental impacts (e.g. sewerage flooding, pollution and low pressure water supply).	Agree, there may be some instances where statutory undertakers may need to carry out essential works to providing services to the community. Additional amendments will be made to the future policy to reflect this.	Include: A caveat regarding operational development by statutory undertakers may be allowed in exceptional circumstances where no other alternative site can be found.
20	Env. Sub Committee	Grove Park Community Group	Issue 1: Open Space Provision: Dealing with Deficiencies	Defunct employment land could be utilised as public open space	Agree, the re-use of Brownfield land for the creation of new open space will be a direction the Council will pursue.	Policy to reflect the use of previously used land for open space.
21	Andrew Reid	on behalf of Tewkesbury Lodge Estate	Issue 1: Open Space Provision: Dealing with Deficiencies	Policy 1.3 should be considered wherever opportunities arise to create open space	Agree, amendments to the policy shall be incorporated.	Policy to reflect the use of previously used land for open space.
21	Andrew Reid	on behalf of Tewkesbury Lodge Estate	Issue 2: Protection & Enhancement of Open Space & Avoiding Inappropriate Development	Improve the environment, access private open space.	Agree, this has already been incorporated within the policy.	No changes made

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
21	Andrew Reid	on behalf of Tewkesbury Lodge Estate	Issue 3: Quality & Maintenance	Provide pleasant & safe environment	Agree, this has already been incorporated within the policy.	No changes made
21	Andrew Reid	on behalf of Tewkesbury Lodge Estate	Issue 5: Protection & Enhancement of Links & Corridors	Resist development 'backland' sites	The LDF will include a policy to reflect the existing character of the borough and that any proposals that would be out of keeping with the character are likely to be refused.	Check which policy this relates to.
22	Laura Graham	Cluttons	Issue 1: Open Space Provision: Dealing with Deficiencies	Option 1,1 is the most favoured target as it has been subject to public scrutiny. It is also consistent with the objectives outlined in PPG17	Support welcomed	No changes made
22	Laura Graham	Cluttons	Issue 2: Protection & Enhancement of Open Space & Avoiding Inappropriate Development	Future Policy should allow for individual sites and proposed developments to be assessed on their individual merit, as well as within a defined set of broad perimeters.	All proposals are assessed on their individual merit. The policies offer a limited amount of scope as long as it is justified.	No changes made

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
22	Laura Graham	Cluttons	Issue 3: Quality & Maintenance	Allow a more unilateral approach to maintenance of open spaces	Agree, there maybe a variety of ways in which open spaces can be managed and maintained. The future policy will allow applicants the freedom to propose different maintenance and management techniques to ensure high quality open spaces	No changes made
22	Laura Graham	Cluttons	Issue 4: Natural Habitats & Biodiversity	We support the objectives of options 4.3, 4.5, 4.6 and 4.7 as they allow for a greater flexibility and consideration of individual circumstances.	Support welcomed	No changes made
22	Laura Graham	Cluttons	Issue 5: Protection & Enhancement of Links & Corridors	Option 5.2 allows for the greatest amount of flexibility whilst ensuring green links running throughout the borough are protected and maintained.	Comments noted	To be assessed further during preferred options process.
26	G. Rowlands	51 Upwood Road	Other Issues?	3.2 is the most important option.	Comments noted	

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
27	Anonymous		Other Issues?	Council needs to think globally and act locally.	The LDF is a development plan that seeks to deliver the aims of the community strategy and other local significant issues. However the plan does recognise various global issues such as the impact of climate change and seeks to play an active role in reducing the boroughs effect on Climate Change and biodiversity.	No changes made
29	Tim Wild	Sydenham Citizens Advice Bureau	Other Issues?	Develop strategies to encourage good usage of private garden space.	The current Open Space Strategy provides a five year framework lasting till 2010 for the boroughs open spaces.	No changes made

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
29	Tim Wild	Sydenham Citizens Advice Bureau	Q3 (Views)	Option 1 in each issue should be recommended	In many cases Option 1 was the preferred choice, however it was considered that an amalgamation of the other options would provide a better policy framework.	No changes made
30	C V Sayers	71 Leyland Road	Other Issues?	Flooding - Important to recognise natural zones	Flooding can have devastating consequences to both human life, biodiversity and property. It will be a requirement that any development within an area of flood risk have in place the necessary preventative measures for reducing the risk of flooding.	No changes made

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
30	C V Sayers	71 Leyland Road	Q3 (Views)	Increased density of use/occupation will off set any increase of open space. 2.2/2.4/2.6/2.8	Agree, it is envisaged that density growth will offset the target for providing open space. In order to balance this offset, it is considered that qualitative enhancements are made based on density figures to allow sufficient improvements to the quality and accessibility to open spaces.	No changes made
42	Pat Trembath	Sydenham Society	Issue 2: Protection & Enhancement of Open Space & Avoiding Inappropriate Development	Long term brownfields sites will be reclaimed by nature - There is no reason why developers should not be expected to provide management for what could become new nature conservation areas within a developed site as part of landscaping & site maintenance.	Brownfield sites are finite sources of land and come under pressure for other uses such as residential or retail. The Council approach will be to create a mix of uses which will include an element of open space and could economically facilitate new nature conservation sites.	No changes made

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
42	Pat Trembath	Sydenham Society	Issue 4: Natural Habitats & Biodiversity	The Council should where possible encourage 'green building methods'	Agree, this will be included within a sustainable design and construction policy.	No changes made
42	Pat Trembath	Sydenham Society	Issue 5: Protection & Enhancement of Links & Corridors	Demographics & climate change means that all developments should be considered as to long term effects.	Agree, these factors have been incorporated within our objectives for the Local Development Framework.	No changes made
49	Peter Richardson	The Users & Friends of Manor House Library	Issue 1: Open Space Provision: Dealing with Deficiencies	Options provided conflict with density plans. Density plans are not viable	Density plans are consistent with the Mayors London Plan and the options provided offer alternative plans to dealing with open space provision and deficiencies.	No changes made

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
49	Peter Richardson	The Users & Friends of Manor House Library	Issue 2: Protection & Enhancement of Open Space & Avoiding Inappropriate Development	What protection do allotments actually have? Suggest TPOs	The Allotments Act of 1925 and 1950 places a duty on all local authorities to provide allotments where demand exists. Allotment sites can also be defined as local open space and have the same level of protection as all other open spaces in the borough. Tree Preservation Orders are an Order enacted by the Local Authority through the Town and Country Planning Act 1990 (as Amended) and can be used in an area where the amenity value can be justified.	No changes made
49	Peter Richardson	The Users & Friends of Manor House Library	Issue 5: Protection & Enhancement of Links & Corridors	A half hour drive or 1.5 hours bus ride gets you to Kent	Unable to comment due to lack of information	No changes made

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
49	Peter Richardson	The Users & Friends of Manor House Library	Issue 5: Protection & Enhancement of Links & Corridors	People require maximum Open Space and proximity to Biodiversity reserves.	Agree, this has already been incorporated within the policy.	No changes made
57	Paula Carney	RPS Planning	Issue 2: Protection & Enhancement of Open Space & Avoiding Inappropriate Development	We support the Core Strategy 2.2 which seeks to protect existing open space and to create new open space in the borough.	Support welcomed	No changes made
57	Paula Carney	RPS Planning	Main Issues Raised:	* Redevelopment of the Surrey Canal Triangle land will provide new areas of public realm	Agree, the proposed redevelopment of this site will offer substantive rewards in producing a high quality open environment.	No changes made
61	Linden Groves	Garden History Society	Other Issues?	No mention of the need to identify, protect and improve historic designed landscapes (inc parks and cemeteries) of national and local importance	This will be covered in the Development Control polices section and due to its statutory weight was not considered to be a prejudicial issue.	No changes made

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
61	Linden Groves	Garden History Society	Q3 (Views)	Commend Options 2.1-2.3 but would like to see a reference to "historic designed landscapes", particularly with regard to 2.3. We would like to see a reference to the English heritage Register of Parks & Gardens of special historic interest and also to a local list of parks & gardens.	Agree, amendments to the policy shall be incorporated.	reference to "historic designed landscapes", particularly with regard to 2.3. We would like to see a reference to the English heritage Register of Parks & Gardens of special historic interest and also to a local list of parks & gardens.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
64	Michelle Barry	RPS group	Issue 2: Protection & Enhancement of Open Space & Avoiding Inappropriate Development	*Ref Opt 2.5 - Undertake more flexible approach, as 1.7ha/1000 will not be achievable on all developments. * Ref Opt 2.6 - Circular 05/2005 on Planning Obligations makes it clear that obligations should not be sought to resolve existing deficiencies and must be clearly related to the development proposed. The Development Framework should make it clear that contributions will only be sought where the need arises as a result of the development proposed.	Agree, the limit of 1.67ha/1000 population has been adopted which is the current level adopted. However, the Council recognises that improvements to the quality of open space will also encourage the use of it by more people. *Agree, Government circular indicates that obligations should not be sought to resolve existing deficiencies, therefore the future policy will only relate to where need is produced from new developments.	No changes made

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
64	Michelle Barry	RPS group	Issue 3: Quality & Maintenance	Option 3.3 states that in areas of deficiency the Council will seek Section 106 contributions to improve the quality of open space facing increased pressure. Circular 05/2005 on Planning Obligations makes it clear that obligations should not be sought to resolve existing deficiencies and must be clearly related to the development proposed.	Agree, Government circular indicates that obligations should not be sought to resolve existing deficiencies, therefore the future policy will only relate to where need is produced from new developments.	No changes made
65	Cllr Robert Massey	London Borough of Lewisham	Issue 1: Open Space Provision: Dealing with Deficiencies	Important for an inner London borough to set targets for access to open space	Agree, comments noted	as per officer response
65	Cllr Robert Massey	London Borough of Lewisham	Issue 2: Protection & Enhancement of Open Space & Avoiding Inappropriate Development	Creating open space in under used sites would be excellent. We could also look at enhancing biodiversity around the margins of areas that are solely lawn-like (e.g. school sports pitches).	Agree, comments noted	To be assessed further during preferred options process.
65	Cllr Robert Massey	London Borough of Lewisham	Issue 2: Protection & Enhancement of Open Space & Avoiding Inappropriate Development	as 1.3	Comments noted	To be assessed further during preferred options process.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
65	Cllr Robert Massey	London Borough of Lewisham	Issue 2: Protection & Enhancement of Open Space & Avoiding Inappropriate Development	Converting Brownfield sites to open space is interesting, if issues like contamination are dealt with. Given that these sites often have high biodiversity a creative approach to their development would be helpful.	Agree, comments noted	To be assessed further during preferred options process.
65	Cllr Robert Massey	London Borough of Lewisham	Issue 3: Quality & Maintenance	I strongly support the idea of refusing development that inhibits access to public open space.	Support welcomed	No changes made
65	Cllr Robert Massey	London Borough of Lewisham	Issue 5: Protection & Enhancement of Links & Corridors	Naturalisation of waterways proved successful in Chinbrook Meadows. So rolling it out across the Pool/ Ravensbourne watershed is an excellent idea.	Support welcomed	No changes made
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Issue 1: Open Space Provision: Dealing with Deficiencies	Core Strategy – Option 1.1: The development of a local standard is consistent with PPG17 and the London Plan.	Support welcomed	No changes made
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Issue 1: Open Space Provision: Dealing with Deficiencies	Development Control Options 1.1 – 1.3: Option 1.1 is preferred, as it aims to address the identified deficiencies.	Comments noted	A combination of the options should be adopted including option 1.1.
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Issue 2: Protection & Enhancement of Open Space & Avoiding Inappropriate Development	Options 2.1 – 2.2: Option 2.2 is preferred, as it is more proactive and addresses quality. MOL should be given strong protection.	Comments noted	MOL to be given strong protection. Local open space to be adopted for all open space regardless of ownership.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Issue 2: Protection & Enhancement of Open Space & Avoiding Inappropriate Development	Development Control – Options 2.1 – 2.8: Option 2.1 is consistent with the London Plan, although MOL should be given strong protection. Option 2.3 is preferred, as gives strong protection to MOL, which is consistent with London Plan policy 3D.9. Option 2.4 is not consistent with London Plan policies 3D.7 and 3D.10, which states all open space should be protected, and that private open space should not be made more vulnerable to development. Designating all open space for protection with a single ‘Local Open Space’ label would be preferred.	Comments noted	MOL to be given strong protection. Local open space to be adopted for all open space regardless of ownership.
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Issue 2: Protection & Enhancement of Open Space & Avoiding Inappropriate Development	Options 2.5 - 2.8 all would appear to be relevant, depending on whether there is an identified deficiency that could be addressed or whether new development would create new demand.	Comments noted	A combination of the options should be adopted

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Issue 3: Quality & Maintenance	Opt 3.4 is too limited as improving the quality of open space should not just be limited to areas of deficiency as existing open space could be poor.	Agree, future policy will be amended to reflect this position. Improvement to the quality of open space should be reflected on all open space regardless of whether it is new or existing.	No changes made
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Issue 3: Quality & Maintenance	Option 3.1 - The aim of improving quality is supported.	Support welcomed	No changes made
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Issue 3: Quality & Maintenance	Option 3.3, which appears to be more about protection, and which is covered in section 2 of the document, should be the adopted approach (as set out in paragraph 3.252 of the London Plan).	Agree, comments noted	A combination of the options should be adopted
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Issue 3: Quality & Maintenance	Policy 3D.12 also requires development control policies on protection of important wildlife sites, protection of important species, and consideration of biodiversity in all planning applications (as per the existing OS12 and OS13 in the adopted UDP).	Agree, these policies will be rolled over into the LDF Development Control Policies DPD	Rollover policies OS12 and OS13 into the Development Control policies DPD.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Issue 4: Natural Habitats & Biodiversity	Opt 4.1 needs to mention important species as well as habitats. *Opt 4.6 should state that planning permission will only be granted for developments which have significant adverse biodiversity impacts if the social and/or economic benefits of the development clearly outweigh the loss of biodiversity. Only then will mitigation and, as a last resort, compensation be considered.	Agree, the important species will be included within the Lewisham Biodiversity Action Plan and made reference to in the Core Strategy and Development Control policies DPD. *This shall be included within future policies.	Include: Planning permission will only be granted for developments which have significant adverse biodiversity impacts if the social and/or economic benefits of the development clearly outweigh the loss of biodiversity. Only then will mitigation and, as a last resort, compensation be considered.
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Issue 5: Protection & Enhancement of Links & Corridors	Option 5.1: The Option given is supported.	Support welcomed	No changes made
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Issue 5: Protection & Enhancement of Links & Corridors	Options 5.2-5.4: Support all three Options.	Support welcomed	No changes made

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
71	Ivan Pasalich	Environment Agency	Issue 1: Open Space Provision: Dealing with Deficiencies	Create open space around main and non-main rivers. This would be backed up by the Water Framework Directive. The environment agency would like to see buffer zones on main rivers reaching 16m in tidal areas, and 8m in non-tidal rivers, plus 5m for non-main rivers. The Environment Agency would also like to encourage where possible, access down to waterways.	Agree, the dangers of flooding cause great harm to property and businesses. Lewisham will seek to maintain a buffer zone of 8 metres along the rivers within the borough.	Lewisham to maintain a buffer zone where feasible of 8 metres along the river corridors.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
71	Ivan Pasalich	Environment Agency	Issue 1: Open Space Provision: Dealing with Deficiencies	<p>Furthermore, it is important to recognise that open spaces can have a multi-functional role in terms of providing green space of recreation purposes, amenity value and enhancing biodiversity. In addition it is important to consider the role of parks and new open space with regard to their potential to help attenuate storm water run off through SUDS schemes as well as providing flood storage space when planned effectively to fit in with river restorations schemes within Lewisham. This is of particular importance in this Borough due to the presence of a number of rivers with stretches, which have been identified as potential sites for river enhancement or restoration. This is outlined within the South London River Restoration Strategy and it would be useful to reference this document within this LDF.</p>	Agree, comments noted	Reference to the South London River Restoration Strategy to be made within the LDF.
71	Ivan Pasalich	Environment Agency	Issue 4: Natural Habitats & Biodiversity	<p>The Environment Agency welcomes and supports the statement that green space with enhanced biodiversity has an important positive impact upon the quality of life and health of the local community.</p>	Support welcomed	No changes made

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
71	Ivan Pasalich	Environment Agency	Issue 4: Natural Habitats & Biodiversity	The Environment Agency welcomes and supports the statement relating to the Borough's watercourses.	Support welcomed	No changes made
71	Ivan Pasalich	Environment Agency	Issue 4: Natural Habitats & Biodiversity	The Environment Agency does not think that Option 4.3 (Allow developments seeking conservation benefits) is necessarily a good idea. There may be other environmental factors that can make development unsuitable regardless of whether environmental enhancement is proposed. For example, if the site is in the floodplain or on contaminated ground. Environmental enhancement and mitigation should be provided from all developments that are known to be suitable to a particular site.	Agree, comments noted	A combination of options 4.2, 4.5 and 4.6 is likely to be adopted.
71	Ivan Pasalich	Environment Agency	Issue 4: Natural Habitats & Biodiversity	Option 4.7 (Consideration of alternatives) is not acceptable to the Environment Agency. No development should result in demonstrable harm to the environment at that site. Providing mitigation at another site would merely create a neutral situation whereby no gain has been made. All development should seek to improve the environment where it is at. Environmental mitigation and enhancement is always possible in one form or another – bird and bat boxes in buildings, green roofs, at least 10%	Comments noted	A combination of options 4.2, 4.5 and 4.6 is likely to be adopted.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
				renewable energy sources, use of Sustainable Urban Drainage Systems, greywater recycling systems, – these can all be introduced in to design without the site having any surrounding environment and would create improvements to an already urbanised footprint. However, we acknowledge that further improvement to the environment elsewhere would always be welcome, but planning should always seek some effort for enhancement at the site in question. Furthermore, and more specific to the Environment Agency, we would strongly object to any development causing demonstrable harm to any waterway or buffer to a waterway, regardless of any environmental enhancement at a different place.		
71	Ivan Pasalich	Environment Agency	Issue 5: Protection & Enhancement of Links & Corridors	The core strategy for Protection and Enhancement of links and corridors is not sufficient. It should be: "To secure the protection of existing ecological and recreational links, AND look for opportunity to increase and enhance new wildlife corridors, including increased buffer zones along rivers and railways, opening up culverts, and providing habitat for wildlife wherever possible".	Agree, comments noted	A combination of options 4.2, 4.5 and 4.6 is likely to be adopted.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
71	Ivan Pasalich	Environment Agency	Issue 5: Protection & Enhancement of Links & Corridors	The Water Framework Directive WFD (Directive 2000/60/EC establishing a framework for the Community action on the field of water policy) should have mention here, within the Plans and Programmes section.	Agree, comments noted	Reference to the European legislation regarding the Water Framework Directive objectives will be included in the preferred options stage.
71	Ivan Pasalich	Environment Agency	Issue 5: Protection & Enhancement of Links & Corridors	The WFD is a major opportunity to improve the whole water environment and promote the sustainable use of water for the benefit of people and wildlife alike. A key piece of European legislation, the WFD rewrites existing water legislation into a new overarching programme to deliver long-term protection of the water environment and improve the quality of all waters - groundwater and surface waters - and associated wetlands, and help create wildlife corridors. Planning authorities and development agencies should be duty-bound to take account of WFD objectives when developing Local Development Frameworks.	Agree, comments noted	Reference to the European legislation regarding the Water Framework Directive objectives will be included in the preferred options stage.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	Summary of Response	Officer Response	Proposed Changes
71	Ivan Pasalich	Environment Agency	Issue 5: Protection & Enhancement of Links & Corridors	The WFD requires the Environment Agency to prepare and publish 10 River Basin Management Plans (RBMP's) by 2009 to promote the concept of sustainable water management. The aims of the RBMP's are: To safeguard the sustainable use of water; To protect and restore the status of aquatic ecosystems; To improve aquatic environments by the reduction of hazardous substances; To reduce groundwater pollution, and To help mitigate the effects of floods and droughts.	Comments noted	Reference to the Environment Agency's 10 River Basin Management Plans to be included in the final submission document.
71	Ivan Pasalich	Environment Agency	Issue 5: Protection & Enhancement of Links & Corridors	The Environment Agency approves of all Option 5.2, 5.3 and 5.4, but we feel that none are sufficient by themselves.	Agree, options to be amalgamated into one policy.	Options to be amalgamated into one policy.

# EMPLOYMENT

LIST OF RESPONDENTS FOR **EMPLOYMENT LAND** ISSUES AND OPTIONS CONSULTATION

RESPONDENTS IDENTIFICATION NUMBER	RESPONDENT
1	Pam Butler, Network Rail
2	Jane Harmer
3	Mr B.V Donovan
4	Mr & Mrs E. Osei-Abeyie
5	James Davies
6	Peter Richardson, The Users & Friends of Manor House Library
7	Councillor Ingleby, London Borough of Lewisham
8	Andrew Reid, Tewkesbury Lodge Estate
9	Anthony Hammond
10	Collette Cunningham
11	Trevor Merrell
12	Paula Carney, RPS Planning
13	Peter W Campbell
14	Andrew Freeman
15	Mr C J Hewish, Scrap the Scrapyrd Residents Group
16	Christine McGoldrick, Strategic Planning Manager, Greater London Authority
17	Michael J.L Freeman-Pinnocks
18	R Washington Young, Washington Young LLP
19	Deidre Mason Honor Oak Park Assoc
22	Alicia Hollings, Yeoman Logistics Ltd
23	Pat Trembath, Sydenham Society
24	Env. Sub Committee, Grove Park Community Group
25	John Hamilton, Secretary of the New School Campaign
26	James Amos, Hephher Dixon

31	David Lane, DLA Town Planning LTD
32	Ash Patel, Sharps Global Trading Ltd
33	T C Chapman, Bromcom Computers PLC
35	Mr K Rope, Diamond Glass & Glazing South Ltd
40	C V Sayers, 71 Leyland Road
42	Barton Willmore Planning Partnership on behalf of Coventry Scaffolding Ltd
43	Paul Russell Associates
44	G Rowlands
45	Mrs June Broome, St. Mary's Conservation Area
46	Tim Wild, Sydenham Citizens Advice Bureau
47	Peter Barber Architects

## Schedule of Representations

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
1	Pam Butler	Network Rail	Defined Employment Area: Manor Lane	General Comment	Network Rail is concerned to ensure that any option chosen is considered carefully in terms of the sites in terms of the sites location adjacent to the operational railway.	These comments are noted.	The preferred option for this site is retention in employment use therefore no redevelopment proposed
1	Pam Butler	Network Rail	Office Development	Larger Office development in Lewisham & Catford Major Town Centres	For the reasons set out in the transportation response, Network Rail would generally support the development of larger offices near public transport hubs.	No response required	Option has been carried forward into the Retail and Town Centre Section of the Core Strategy, and AAP.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
1	Pam Butler	Network Rail	Strategic Employment Location: Arklow Road	General Comment	Network Rail is concerned to ensure that any option chosen is considered carefully in terms of the sites in terms of the sites location adjacent to the operational railway. There are some operational issues relating to residential open space...	These comments are noted. These matters are for the detailed design of any proposed development.	No change proposed

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
1	Pam Butler	Network Rail	Strategic Employment Location: Childers Street	General Comment	Network Rail has no particular view on the allocations for the land in Childers Street, other than to note that it has recently upgraded the spaces under the arches to provide high quality business and industrial units.	These comments are noted. These matters are for the detailed design of any proposed development.	No change proposed

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
1	Pam Butler	Network Rail	Strategic Employment Location: Coldblow Lane	General Comment	This site is currently included in the Surrey Canal Strategic Employment Location. The site suggested for residential development forms a discrete parcel on the eastern side of the railway line. The site's location is strategic in that it will be useful	This option has not been carried forward in response to this comment.	The site has been included in the Surrey Canal Strategic Employment Location.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
2	Jane Harmer		Strategic Employment Location: Oxestalls Road	Supports Redevelopment for Mixed Use Employment, Housing, Community Use	Chose specifically creative industries for local community and not light industrial use.	Any employment element in a mixed use redevelopment will need to be compatible with residential development either by appropriate location or by character of the use. This will be dealt with in the detailed design of any proposed redevelopment.	The Preferred Option policy for Oxestalls Road site is designation as a Mixed Use Employment Area. The content of the policy includes a requirement to provide a range of business units suitable for varied uses. The Council will also include a policy sup
3	Mr B.V Donovan		Strategic Employment Location: Oxestalls Road	Supports Redevelopment for High Density Residential/Employment on Bridge Wharf and Victoria Wharf	'Excellent ideas, even better if you can open Surrey Canal, another Little Venice'	The Council supports mixed use development on Bridge and Victoria Wharfs but considers that comprehensive redevelopment of the entire Oxestalls Road area will provide a more satisfactory environmental and developmental option.	Preferred Development Policy for Mixed Use Employment Area involving comprehensive redevelopment of Oxestalls Road area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
4	Mr & Mrs E. Osei-Abeyie		Strategic Employment Location: Oxestalls Road	Supports Redevelopment for Mixed use - Employment and Housing, Community Use.	No large industry, creative industries, green spaces and playground	Redevelopment of the site would require play spaces and green spaces and a range of business units to support a wide range of business activities compatible with residential development.	The Council supports the redevelopment of the Oxestalls Road site for a comprehensive mixed use development, and has put this forward as a preferred option in the development policies document.
5	James Davies		Strategic Employment Location	New Option/General Comment	Did not think these sites should remain in industrial use. Should be community/commercial, green spaces. High density housing residents must be the to consideration re: quality of life issues	The Council must retain sites designated as a Strategic Employment Location to enable the functioning of London as a whole such as warehousing, some industrial processes, waste management and public utilities. The Council has reviewed all the industrial	Preferred Option will be Strategic Employment Location and Mixed Use Employment Areas

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
5	James Davies		Strategic Employment Location: Oxestalls Road	Supports redevelopment for Mixed use - Employment and Housing, Community Use.	'Pro: Green Spaces. No industry. Light commercial/creative	As Oxestalls Road is a large site there is a possibility of locating some industry in part of the site without affecting residential development. The Council is promoting as a Preferred Option mixed use, commercial residential development on the site	The Council supports the redevelopment of the Oxestalls Road site for a comprehensive mixed use development, and has put this forward as a preferred option in the development policies document.
6	Peter Richardson	The Users & Friends of Manor House Library	Bromley Road Strategic Employment Location: Bellingham Trading Estate	Supports retaining employment use or use for Waste Processing		The Council supports the continuing industrial functioning of the Bromley Road SEL	Preferred Option for this site will be designation as part of the Bromley Road SEL
6	Peter Richardson	The Users & Friends of Manor House Library	Bromley Road Strategic Employment Location: Catford Bus Garage	Supports continuation in employment use or waste processing		The Council supports the continuing industrial functioning of the Bromley Road SEL	Preferred Option for this site will be designation as part of the Bromley Road SEL

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
6	Peter Richardson	The Users & Friends of Manor House Library	Bromley Road Strategic Employment Location: Corner Site Randlesdown Road	Retain Employment use		The Council considers that the Bromley Road Strategic Employment Location is a large reservoir of industrial/warehouse land in the south of the borough which is important for the functioning of London as a whole and supports continuation of the employment use.	Designate this site as part of the Bromley Road Strategic Employment Location.
6	Peter Richardson	The Users & Friends of Manor House Library	Bromley Road Strategic Employment Location: Depot Fordmill Road	Supports continuation in employment use, waste processing or mixed use commercial and housing redevelopment option		The Council supports the continuing industrial functioning of the Bromley Road SEL	Preferred Option for this site will be designation as part of the Bromley Road SEL and therefore continuation in employment use.
6	Peter Richardson	The Users & Friends of Manor House Library	Bromley Road Strategic Employment Location: Initial Textile Services	Supports continuation in employment use or waste processing		The Council supports the continuing industrial functioning of the Bromley Road SEL	Preferred Option for this site will be designation as part of the Bromley Road SEL and therefore continuation in employment use.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
6	Peter Richardson	The Users & Friends of Manor House Library	Bromley Road Strategic Employment Location: Police Garage Aitken Road	Supports continuation in Employment use, waste processing or other use - open space		The Council supports the continuing industrial functioning of the Bromley Road SEL	Preferred Option for this site will be designation as part of the Bromley Road SEL and therefore continuation in employment use.
6	Peter Richardson	The Users & Friends of Manor House Library	Creation of New Business Floorspace	Supports Creation of New Employment Floorspace by S106 agreements	Disagreed with proposal to use S106 contributions towards the creation of affordable replacement floorspace.	The Council is committed to obtaining S106 contributions in an open manner in order to fund improvements or mitigation required arising from redevelopment	The S106 approach will be carried forward in to the preferred options
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Area: Blackheath Hill	Retain Employment use	Amply suited for its purpose	The Council considers that this DEA should continue in employment use.	Designate this site as a Defined Employment Area.
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Area: Clyde Vale/Perry Vale	Retain Employment Use.	Transport links quite good	The Council considers that these sites perform an important function in the local economy and that employment uses should be retained.	Designate these sites as a Defined Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Area: Creekside	Supports New Option - see comments	Release that part of the area that is currently vacant for reasons of transport access. Considered that the site provides an important nucleus for creative industries, but that they are notoriously fickle.	The Council considers that this area currently in business use provides the nucleus for creative industries in Creekside and therefore wishes to see employment uses continue.	No change in response to this comment. The Council's Preferred Option will be to designate this site as a Preferred Employment Area
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Area: Endwell Road	Retain employment use	The Borough needs employment		
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Area: Evelyn Street	Retain employment use	People need jobs. The Council need Business Ratepayers.	The Council considers that this is a well used area on main routes, and should remain in employment use.	The Council's Preferred Option will be to retain Employment on this site and designate it a Defined Employment area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Area: Goodwood Road	Retain employment use	Already in mixed use, heavily biased to flats, but full capacity of business units	Goodwood Road Defined Employment Area has lost part of its B Use Class base and has become fragmented. It is in important town centre location where the Council is seeking to regenerate the local environment...	Preferred Option will not be designation of Defined Employment Area and will be covered by the 'other Employment Area' policy which is supportive of new commercial uses in Town Centre locations.
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Area: Malham Road	Retain employment use	Heavily Used by business	This area is in full business use , is in an area of the borough where land in this type of use is in short supply, and performs an important function in the local economy.	The Councils preferred option is to propose this area as a Defined Employment Area.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Area: Manor Lane	Retain employment use	Extensively used by businesses. Mad road-pinching in Manor Lane restricts commercial vehicles access from points other than the South Circular.	This site has seen recent employment development and is well used. The Council agrees that it should be retained in employment use.	Preferred Option for this area will be Defined Employment Area
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Area: Molesworth Street	Retain employment use	Amply suited for current use	This designation will be addressed as part of the Lewisham Action Area Local Plan consultation Report	To be dealt with as part of Lewisham AAP
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Area: Plough Way	Retain employment use.	Area in full use. Businesses regard it as eminently suitable judging by capacity	The Council considers that the southern portion of the site is underused and would benefit from redevelopment in order to update existing premises and increase the number of jobs provided by the site.	The Preferred Option is to designate the southern part of the site as a Mixed use Employment Area, and the northern part of the site as a Defined Employment Area.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Area: Stanton Square	Retain employment use.	Very suitable for small businesses	The Council considers that this island site, is suitable for continued business/industrial use.	Preferred Option for this site is Defined Employment Area status.
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Area: Willow Way	Retain employment use.	Suitable for present uses	The Council considers that this site provides various small business premises important to the local economy and suitable for continued use.	Preferred Option will be to designate this site as a Defined Employment Area.
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Area: Worsley Bridge Road	Retain employment use.	Amply suited to business purposes	The Council considers that this site provides various small business premises important to the local economy and suitable for continued use.	Preferred Option will be to designate this site as a Defined Employment Area.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Areas	Retain all Defined Employment Areas	Retain all current DEAs. Given potential for work and full capacity. In the event the former is not realised and given that extensive publicity for its employment use has been made, if the site is derelict, it should be redeveloped.	The Council has retained most of the DEAs in the preferred Option, either as Strategic Employment Location or DEA. Under-used sites or where there has been some loss of employment land and the area has not retained its business character and integrity	Preferred Options is a three types of Employment Land designation - Strategic Employment Location, Defined Employment Area or Mixed Use Employment Area.
6	Peter Richardson	The Users & Friends of Manor House Library	Defined Employment Areas: General Preferences for Alternative Uses	Supports Mixed use commercial and residential development.		The Council supports this position on Defined Employment Areas proposed for redevelopment	Preferred Option is for Mixed use commercial/residential development as alternative uses for those Defined Employment Areas no longer considered to meet the requirement for this designation.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
6	Peter Richardson	The Users & Friends of Manor House Library	Employment Clusters and Creative Industries	Supports Creative Quarters	Probably yes. Creative uses tend to be fickle.	This approach is carried forward in the Development Plan Documents.	Preferred Option to promote creative industries.
6	Peter Richardson	The Users & Friends of Manor House Library	General Comment	Not applicable	Directive to create 11,000 new-build housing units plus 6,000 conversion units is plainly a daft idea. The pressures this creates on existing planning problems is phenomenal. It should be rejected on the grounds that it is unachievable	These targets are given by the London Plan to which the local planning framework is required to be in conformity by legislation.	No change in response to this comment

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
6	Peter Richardson	The Users & Friends of Manor House Library	Live/Work Developments	Chose Live Work Developments in Town Centres or Refused in favour of Mixed Use or Residential	The widest mix of uses is the most preferable	The Council considers that some live/work developments may not promote a mix of uses in some locations in that residential uses will eventually take over. Mixed use development in many cases is best promoted by having these uses separated out.	No preferred option for Live work units will be carried forward into the Development Plan Documents.
6	Peter Richardson	The Users & Friends of Manor House Library	Office Development	Supports Large Office Development in Lewisham and Catford Town Centres	Agrees Mainly directed to Lewisham and Catford Town Centres	This approach has been carried through in the development plan documents	Preferred Options for office development in Lewisham and Catford Town Centres.
6	Peter Richardson	The Users & Friends of Manor House Library	Other Employment Sites	Supports Use of Criteria to judge redevelopment of these sites	Agree they should all be preserved in business use. Redevelop only if the business potential no longer exists	The Council will be introducing a criteria based policy on these lines.	Preferred Option - Criteria based policy for other employment areas

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
6	Peter Richardson	The Users & Friends of Manor House Library	Strategic Employment Location	Supports Current SEL Boundaries	Agree that core sites should be retained.	A set of core sites has been retained. Some SEL sites have been redesignate Mixed Use Employment Areas.	Preferred Option will be core set of sites within SEL with those sites considered underused redesignated as Mixed Use employment areas.
6	Peter Richardson	The Users & Friends of Manor House Library	Strategic Employment Location	Supports Review of Strategic Employment Location Boundaries	It is important that people can find industrial employment locally. If they are lost there may be a case for this where industrial uses are few and potential uses have not been extensively encouraged resulting in poor or declining use.	The Council has reviewed the boundaries of the SELs and is promoting redevelopment on those sites which are not well uses to increase their contribution to the local economy and the numbers of jobs provided.	Preferred Option to retain cores sites within Strategic Employment Location, and designate a number of mixed use employment areas for redevelopment as above

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
6	Peter Richardson	The Users & Friends of Manor House Library	Strategic Employment Location: Arklow Road	Supports retaining Employment or any Mixed Use Employment/Residential redevelopment option		This site will be considered as a whole along with the near adjacent Childers Street buildings for mixed use employment/residential development.	Preferred Option will be Mixed Use Employment area.
6	Peter Richardson	The Users & Friends of Manor House Library	Strategic Employment Location: Bolina Road Waste Transfer	Supports Addition of site to Strategic Employment Location		This site will be required for the Bermondsey Diveunder Thameslink Rail project which is now programmed to be implemented during the lifetime of this plan. It will therefore not be available for Strategic Employment Location uses	This option will not be carried forward as a Preferred Option

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
6	Peter Richardson	The Users & Friends of Manor House Library	Strategic Employment Location: Childers Street	Supports retention of Employment or Mixed Use Employment/Housing redevelopment	Keep employment use as a high priority	This site will be considered as a whole along with the near adjacent Arklow Road Industrial Estate for mixed use employment/residential development.	Preferred Option will be mixed use Employment area.
6	Peter Richardson	The Users & Friends of Manor House Library	Strategic Employment Location: Coldblow Lane	Supports New redevelopment Option Coldblow Lane	Better to be redeveloped as community uses/open space if it is certain not to be further used as employment land. An up-turn could be only a year or two away!	This site will be required for the East London Line extension works and will likely not be available for consideration of development during the lifetime of the plan.	This site will be retained within the SEL.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
6	Peter Richardson	The Users & Friends of Manor House Library	Strategic Employment Location: Orion Business Centre	Supports Mixed Use Commercial. Residential redevelopment, or Retention of Employment or Waste Management	All options chosen retain an employment use.	The Council considers that the future arrival of a station on the East London Line Extension will support this sites role in Mixed Use Employment Area redevelopment	Preferred Option will be Mixed Use Employment Area.
6	Peter Richardson	The Users & Friends of Manor House Library	Strategic Employment Location: Oxestalls Road	Supports Retaining Employment Use or Mixed use redevelopment Option with Employment ,or Waste management	Employment uses should be kept a high priority	The Council's policy for this site will be to support as much employment as possible in any redevelopment proposals	Preferred Option is Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
6	Peter Richardson	The Users & Friends of Manor House Library	Strategic Employment Location: Rollins Street/Stockholm Road	Retain Employment Use or Identify for Waste Management		These sites are underused or do not provide a strong employment contribution. The Council considers they would benefit from high density mixed use redevelopment and does not agree with the respondent	Preferred Option will be Mixed use Employment Area
7	Councillor Ingleby		Bromley Road Strategic Employment Location: Bellingham Trading Estate	Supports continuation in Employment Use		The Council supports the continuing industrial functioning of the Bromley Road SEL	Preferred option will be inclusion in the Bromley Road SEL.
7	Councillor Ingleby		Bromley Road Strategic Employment Location: Corner Site Randlesdown Road	Supports redevelopment for high density residential development		The Council supports the continuing industrial functioning of the Bromley Road SEL	Preferred option will be inclusion in the Bromley Road SEL and retention in employment use.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
7	Councillor Ingleby		Bromley Road Strategic Employment Location: Depot Fordmill Road	Supports continuation in employment use		The Council supports the continuing industrial functioning of the Bromley Road SEL	Preferred option will be inclusion in the Bromley Road SEL and therefore redetection in employment use.
7	Councillor Ingleby		Bromley Road Strategic Employment Location: Initial Textile Services	Supports continuation in Employment use and/or redevelopment for other uses		The Council supports the continuing industrial functioning of the Bromley Road SEL	Preferred option will be inclusion in the Bromley Road SEL and therefore continuation in employment use.
7	Councillor Ingleby		Bromley Road Strategic Employment Location: Police Garage Aitken Road	Supports continuation in employment use and mixed use commercial and housing		The Council supports the continuing industrial functioning of the Bromley Road SEL	Preferred option will be inclusion in the Bromley Road SEL and therefore continuation in employment use.
7	Councillor Ingleby		Creation of New Business Floorspace	Supports creation of Affordable Employment Floorspace by using S106 Agreements	Agrees	No response required	This will be carried forward into the Preferred Option documents.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
7	Councillor Ingleby		Defined Employment Area: Manor Lane	Retain employment use		The Council considers this area should be retained in employment use - it is well used, has seen a recent high quality business development, is in an area of the borough where this type of land is in short supply .	Preferred Option to designate as Defined Employment Area
7	Councillor Ingleby		Defined Employment Area: Molesworth Street	No Opinion		No response required	This area will be dealt with as part of the Lewisham Action Area Local Plan

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
7	Councillor Ingleby		Defined Employment Area: Plough Way	No Opinion	Perhaps 50% Affordable Housing and 50% commercial - SME development /live/work	The Council has reviewed this employment area and considers that the southern half of the site is suitable for a mixed use employment development as it is underused and other buildings could be redeveloped to provide a better contribution to the economy	Preferred Option is Mixed Use Employment Area and Defined Employment Area
7	Councillor Ingleby		Defined Employment Area: Stanton Square	No Opinion	Could be used by SME's and live/work	Part of this area is modern purpose built units, and part is in older buildings which could be used by SME's. Live Work would need to be considered carefully on its merits in order to not introduce a residential element into a Defined Employment Area	Preferred Option for this site is Defined Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
7	Councillor Ingleby		Defined Employment Area: Willow Way	No Opinion	Maybe 50% Affordable and 50% commercial	The Council reviewed this site and considered that it is important to the local economy and capable of continued industrial/commercial functioning.	Preferred Option for this site is designation as a Defined Employment Area
7	Councillor Ingleby		Defined Employment Area: Worsley Bridge Road	No Opinion	Maybe 50% Affordable Housing	The Council reviewed this site and considered that it is important to the local economy and capable of continued industrial/commercial functioning.	Preferred Option for this site is designation as a Defined Employment Area
7	Councillor Ingleby		Defined Employment Areas	Supports criteria based decision for retention of Defined Employment Areas	All neighbourhoods evolve, especially in relation to Small and Medium Enterprises, knowledge economy and live/work possibilities	The Council has reviewed the Defined Employment Areas and designated those for employment protection that perform an important local economic function and are suitable for continued use.	Preferred Option will be Defined Employment Area policy that protects B use classes in these areas

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
7	Councillor Ingleby		Defined Employment Areas: General Preferences for Alternative Uses	Supports Mixed use commercial and residential development with a proportion of affordable housing and community use		The Defined Employment Areas have been reviewed and most of them have been found suitable for continued employment use.	Preferred Option is continuation of protection of most Defined Employment Areas (or as Strategic Employment Location). Those that have been released proposed for mixed use development - Mixed Use Employment Areas
7	Councillor Ingleby		Employment Clusters and Creative Industries	Supports Creative Quarters		No response required	Policy will be carried forward into the Preferred Option documents

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
7	Councillor Ingleby		Live/Work Developments	Encourage Live/work in Town Centres and in Older Warehouse Buildings	Agrees with L/W developments in town centres and older warehouse buildings and should not be refused pp in favour of 100% residential or mixed use commercial and residential. Use the St James Homes method.	Developments will be judged on their merits in appropriate buildings	No preferred option will be carried forward for Live/work developments.
7	Councillor Ingleby		Office Development	Supports directing larger Office Development to Lewisham and Catford Town Centres	Agrees that larger office development should be directed to Lewisham and Catford centres	No response required	This will be carried forward into the Preferred Option documents

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
7	Councillor Ingleby		Other Employment Sites	Supports retaining smaller sites in Business/Industrial use	Agrees that all smaller employment sites in the Borough should be preserved in business/industrial use.	The Council considers that some of these sites are not well located in relation to residential use and is introducing policies to account for this situation	Preferred Option will be Criteria based policy to consider these sites.
7	Councillor Ingleby		Strategic Employment Location	Supports maintaining current boundaries of Strategic Employment Locations	Protect Small and Medium Enterprises and the Creative Sector	The SELs are not necessarily locations for the Creative Sector. The Council is intending to ensure that by revising the SEL boundaries to allow for Mixed Use employment areas a supply of smaller high quality premises will be provided.	The Preferred Option is to maintain a core set of Sites within SELs and a selection of Mixed Use Employment Areas to provide variety in premises.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
7	Councillor Ingleby		Strategic Employment Location	Supports maintaining status quo of Strategic Employment Location boundaries		The Council has reviewed the boundaries of the SEL at Surrey Canal Road and considers that sites that are underused and present a poor environmental quality to adjacent occupiers would make a more substantial contribution to job provision.	Preferred Option will be core SEL sites at Surrey Canal Road and designation of Mixed Use Employment areas, and maintenance of Bromley Road SEL boundaries.
7	Councillor Ingleby		Strategic Employment Location: Arklow Road	Supports redevelopment for Mixed Use Employment/Live/work/housing		This site will be considered as a whole along with the near adjacent Childers Street buildings for mixed use employment/residential development.	this site will be considered as a whole along with the near adjacent Childers Street buildings for mixed use employment/residential development - Preferred Option will be Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
7	Councillor Ingleby		Strategic Employment Location: Childers Street	Supports redevelopment for Mixed Use Employment/Live Work		This site will be considered as a whole along with the near adjacent Arklow Road Industrial Estate for mixed use employment/residential development.	Preferred Option will be Mixed Use Employment Area
7	Councillor Ingleby		Strategic Employment Location: Orion Business Centre	Supports redevelopment for Mixed Use Employment/Housing	Mixed use employment and housing	The Council is proposing this site for mixed use redevelopment in line with these comments.	Preferred Option is Mixed use Employment Area
7	Councillor Ingleby		Strategic Employment Location: Oxestalls Road	Supports mixed use redevelopment for Bridge Wharf/Victoria Wharf	Option suggested by landowners of Bridge Wharf and Victoria Wharf - mixed use high density residential development which would provide more jobs than currently exist on site.	The Council is proposing that this site be included in a comprehensive development treatment of all the sites Oxestalls Road	Preferred Option is inclusion of these sites in the Oxestalls Road Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
7	Councillor Ingleby		Strategic Employment Location: Rollins Street/Stockholm Road	Supports redevelopment for Mixed Use Commercial/Residential/Live work	Mixed Use Commercial/Residential/Live Work on Excelsior, employment uses retained on Stockholm Road and Rollins Wharf	The Council will consider these sites as a whole in order to achieve a balanced mix of uses, increase the number of jobs provided and improve the overall environment.	The Council is proposing a Mixed Use Employment Area for these sites and a comprehensive development treatment.
8	Andrew Reid	Tewkesbury Lodge Estate	Creation of New Business Floorspace	Uncertain that supporting new business floorspace through S106 agreements is a good idea	No opinion but concerned that where there is intense pressure on land use this is a way of saying we should 'waste' land supporting uneconomic activities.	The Council is committed to negotiating S106 agreements as a means of improving or mitigating the effect of redevelopments.	The S106 approach will be taken through into Development Plan Preferred Options

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
8	Andrew Reid	Tewkesbury Lodge Estate	Defined Employment Area: Clyde Vale/Perry Vale	Retain Employment Use	<p>These sites appear to be reasonably successful with high levels of occupancy. They provide local employment and to a large extent, local services. They provide a core element in the potential for regeneration of Forest Hill.</p>	The Council agrees with this comment.	Preferred Option will be designation as a Defined Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
8	Andrew Reid	Tewkesbury Lodge Estate	Defined Employment Areas	Either remove employment protection entirely or decide by a set of criteria	Some DEAs appear to be underutilised and better use could be made of the space for housing. This decision needs to be taken on a case by case basis. If there is a demand for the properties on the site from businesses willing to pay a market rent,	The Council has retained most of the DEAs in the preferred Option, either as Strategic Employment Location or DEA. Under-used sites or where there has been some loss of employment land and the area has not retained its business character and integrity	Preferred Options is a three types of Employment Land designation - Strategic Employment Location, Defined Employment Area or Mixed Use Employment Area.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
8	Andrew Reid	Tewkesbury Lodge Estate	Defined Employment Areas: General Preferences for Alternative Uses	Allow mixed commercial and residential development	Allow for mixed use commercial and residential development with a proportion of affordable housing and community facilities. However each case needs to be considered in the light of all the surrounding circumstances.	The Council has reviewed designated employment areas and is proposing Mixed Use Employment areas for those not designated as Strategic Employment Locations or Defined Employment Areas	Preferred Option for sites not designated as Strategic Employment Locations or Defined Employment Areas will be Mixed Use Employment Areas
8	Andrew Reid	Tewkesbury Lodge Estate	Employment Clusters and Creative Industries	Supports Creative Quarters	This sort of initiative in Forest Hill would be supportive of the Forest Hill regeneration strategy	This policy will be carried forward into the Preferred Option development plan documents	See officer response

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
8	Andrew Reid	Tewkesbury Lodge Estate	Live/Work Developments	Supports live/work developments close to town centres	Support current UDP policy. We think that may areas of largely residential housing can support live-work activity (beyond the corner) and that providing the activity is acceptable to the neighbours it should be encouraged.	The Council considers that Live/work developments are to be considered on their merits due to concerns about their continued business use.	No Preferred Option will be carried forward in to the Development Plan Documents.
8	Andrew Reid	Tewkesbury Lodge Estate	Office Development	Agrees Major office development in Lewisham and Catford Town centres		No response required	This approach will be carried forward in the development plan Preferred options

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
8	Andrew Reid	Tewkesbury Lodge Estate	Other Employment Sites	Assess redevelopment on these sites by use of criteria	Support individual assessment of sites- circumstances vary and sites need consideration on their individual merits.	The Council is preparing policies to deal with sites on an individual basis.	Preferred Option will be a criteria based policy
8	Andrew Reid	Tewkesbury Lodge Estate	Strategic Employment Location	Supports review of Strategic Employment Location boundaries.	No specific uses suggested for Sites removed from Strategic Employment Locations - simply a requirement to review as circumstances/priorities change.	The Council has reviewed the boundaries of the SELs	Preferred Option is retention of core sites at Surrey Canal SEL with Mixed Use Employment Areas and retention of Bromley Road SEL.
9	Anthony Hammond		Strategic Employment Location: Oxestalls Road	Support redevelopment for Mixed Use Employment, Housing and Community Use	Mixed Use - Employment and Housing, Community Use - Creative art space and light workshops	It may be possible to include creative space and light workshops in a Mixed Use Employment Area	Preferred Option will be Mixed Use Employment Area for this site

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
10	Collette Cunningham		Strategic Employment Location	Support review of Strategic Employment Location Boundaries	Other uses should be residential, offices and creative industries. The mixture of light/medium industry and intensive housing so far has not been successful	The boundaries of the Strategic Employment Locations have been reviewed. Some sites will be designated as Mixed Use Employment Areas to support a mix of residential and other business uses.	Preferred Option will be core SELs and designation of Mixed use Employment Areas
10	Collette Cunningham		Strategic Employment Location: Oxestalls Road	Support redevelopment for Mixed Use Employment, Housing and Community Use	Mixed Use - Employment and Housing, Community Use	The Council will carry forward this proposal in the Preferred Options document	Preferred Option for this site will be Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
11	Trevor Merrell		Strategic Employment Location	Supports review and redevelopment of Strategic Employment Locations	Disagrees. Should be new housing and offices places for people to live and work to improve the area.	The Council has reviewed the boundaries of the Surrey Canal SEL and considers that some sites should be designated as Mixed Use Employment areas. However the Council must maintain sites within the SEL to ensure the continued functioning of the industrial	Preferred Option is designation of SEL and Mixed Use Employment Areas .
11	Trevor Merrell		Strategic Employment Location: Arklow Road	Supports redevelopment for Mixed use	Redevelop Donway building for B1 employment and live/work, and the rest B1 and 'mixed tenure' housing with a proportion of affordable housing	The Council will be promoting the comprehensive redevelopment of this site as a Mixed Use Employment Area	Preferred Option will be mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
11	Trevor Merrell		Strategic Employment Location: Childers Street	Supports redevelopment for Mixed Use Employment/Live Work/Housing	Mixed use employment/Live work units housing	This site will be considered as a whole along with the near adjacent Arklow Road Industrial Estate for mixed use employment/residential development.	Preferred Option will be Mixed Use Employment Area
11	Trevor Merrell		Strategic Employment Location: Coldblow Lane	New Option Coldblow Lane - supports redevelopment for housing	Agree with the suggestion - Redevelop for housing	Network Rail have advised that this site will not be available for development during the lifetime of this plan as it will be required for construction works to the East London Line extension.	The option for housing will not be carried forward into the Development Plan documents. Preferred Option will be retain within Strategic Employment Location
11	Trevor Merrell		Strategic Employment Location: Oxestalls Road	Supports redevelopment for housing		The Council considers that the site because of its size and location has the potential to make a contribution to jobs provision and to revitalise the local economy as well as providing housing.	The Preferred Option is for a Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
11	Trevor Merrell		Strategic Employment Location: Rollins Street/Stockholm Road	Supports redevelopment for housing and community use		The Council will be designating these sites as Mixed Use Employment areas to ensure that redevelopment will increase the numbers of jobs provided on these sites as well as residential development.	Preferred Option will be mixed use employment area
12	Paula Carney	RPS Planning	Strategic Employment Location	Supports review of Strategic Employment Location boundaries	The Greater London Authority (GLA) has identified a number of areas of land as Strategic Employment Locations (SELs) in the London Plan and in their Sub Regional Development Frameworks.	The Council has reviewed the boundaries of the SEL at Surrey Canal Road and considers that sites that are underused and present a poor environmental quality to adjacent occupiers would make a more substantial contribution to job provision.	Preferred Option will be Strategic Employment Location and Mixed Use Employment Areas

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
12	Paula Carney	RPS Planning	Strategic Employment Location: Rollins Street/Stockholm Road, Bolina Road, Bolina Road Waste Transfer	Supports Mixed use development options for these sites	The western part of the Surrey Canal is well-served by public transport, being immediately adjacent to South Bermondsey Railway Station with a high frequency of services connecting into London Bridge and Victoria.	These sites have the potential to make a strong contribution to the regeneration of North Lewisham by creating a new destination in an area that has few community facilities, increasing the number and variety of jobs provided and improving and transforming	Preferred Option is Mixed Use Employment Area
13	Peter W Campbell		Strategic Employment Location: Oxestalls Road	Supports redevelopment for housing or park	Allocate land for housing or park. Get rid of scrap yard.	The Council considers that the site because of its size and location has the potential to make a contribution to jobs provision and to revitalise the local economy as well as providing housing.	Preferred Option is for Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
14	Andrew Freeman		Strategic Employment Location	Supports review of Strategic Employment Location boundaries	Disagrees. Light industrial only. Heavy trucks not appropriate in the area.	The Council has reviewed the boundaries of the Strategic Employment Location and has designated those sites suitable for continuation in SEL use	Preferred Option for amended boundary to Strategic Employment Location
14	Andrew Freeman		Strategic Employment Location: Arklow Road	Supports Options for Mixed use employment/Live Work units, Housing		The Council will be promoting the comprehensive redevelopment of this site as a Mixed Use Employment Area	Preferred Option will be Mixed Use Employment Area
14	Andrew Freeman		Strategic Employment Location: Childers Street	Supports Mixed Use Employment/Live Work Units, Housing		This site will be considered as a whole along with the near adjacent Arklow Road Industrial Estate for mixed use employment/residential development.	Preferred Option will be Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
14	Andrew Freeman		Strategic Employment Location: Coldblow Lane	Supports redevelopment of site at Coldblow Land for housing	Yes agree with option for housing provided it is of good quality	Network Rail have advised that this site will not be available for development during the lifetime of this plan as it will be required for construction works to the East London Line extension.	The option for housing will not be carried forward into the Development Plan documents. Preferred Option will be retain within Strategic Employment Location
14	Andrew Freeman		Strategic Employment Location: Orion Business Centre	Supports Mixed Use - employment and housing		The Council is proposing this site for mixed use redevelopment in line with these comments.	Preferred Option will be Mixed Use Employment Area
14	Andrew Freeman		Strategic Employment Location: Oxestalls Road	Supports Mixed use employment housing and community use options	Would want to see proposal first. Current heavy industry - scrap yard, Onyx heavy trucks should go.	The Council is proposing a comprehensive mixed use development for this site which will involve an increase in the number of jobs provided as well as housing provision, and an overall upgrading and regeneration of the environment.	Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
14	Andrew Freeman		Strategic Employment Location: Rollins Street/Stockholm Road	Supports either retention of employment use or redevelopment for housing/community use		The Council will consider these sites as a whole in order to achieve a balanced mix of uses, increase the number of jobs provided and improve the overall environment.	The Council is proposing a Mixed Use Employment Area for these sites and a comprehensive development treatment.
15	Mr C.J. Hewish	Scrap the Scrapyard Residents Group	Strategic Employment Location	General Comment on retention or release of sites	I have no opinion because I have no knowledge of the nature or relation of the industrial sites a housing. Light commercial use should always buffer housing from heavy and polluting commercial work sites.	The Council has reviewed the boundaries of the Strategic Employment Location at Surrey Canal Road and designated those sites considered to have a deleterious effect on the surrounding environment, and also under-used in terms of the potential to generate	Preferred Option will be core SEL sites at Surrey Canal Road and designation of Mixed Use Employment areas, and maintenance of Bromley Road SEL boundaries.
15	Mr C.J. Hewish	Scrap the Scrapyard Residents Group	Strategic Employment Location: Arklow Road	No opinion on retention or redevelopment	No opinion	No response required	Preferred Option for Arklow Road will be mixed use employment area designation

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
15	Mr C.J. Hewish	Scrap the Scrapyard Residents Group	Strategic Employment Location: Bolina Road Waste Transfer	No opinion on Inclusion in SEL	No comments but principle that light industrial should always buffer housing from heavy and polluting commercial work sites.	This site will be required for the Bermondsey Diveunder Thameslink Rail project which is now programmed to be implemented during the lifetime of this plan. It will therefore not be available for Strategic Employment Location uses	This option will not be carried forward as a Preferred Option
15	Mr C.J. Hewish	Scrap the Scrapyard Residents Group	Strategic Employment Location: Childers Street	No Opinion on retention or redevelopment		No response required	Preferred Option will be Mixed Use Employment Area
15	Mr C.J. Hewish	Scrap the Scrapyard Residents Group	Strategic Employment Location: Coldblow Lane	No Opinion on future use		No response required	The option for housing will not be carried forward into the Development Plan documents. Preferred Option will be retain within Strategic Employment Location

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
15	Mr C.J. Hewish	Scrap the Scrapyard Residents Group	Strategic Employment Location: Orion Business Centre	No Opinion on future use	If employment use/waste management then light commercial use should always buffer housing from heavy and polluting commercial work sites.	This site is at an important location adjacent to the future station on Phase 2 of the East London Line extension. It is not adjacent to residential uses. However it could provide a greater contribution to the regeneration of the north of the borough in	Preferred Option will be Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
15	Mr C.J. Hewish	Scrap the Scrapyard Residents Group	Strategic Employment Location: Oxestalls Road	OXE 3	Mixed Use - Employment and Housing, Community Use is best to light commercial use always buffering housing from heavy and polluting commercial work sites. A perceived need exists for a secondary school in this part of Lewisham borough.	No response required.	Preferred Option will be Mixed Use Employment Area
15	Mr C.J. Hewish	Scrap the Scrapyard Residents Group	Strategic Employment Location: Rollins Street/Stockholm Road	No Opinion on future use	If employment use/waste management then light commercial use should always buffer housing from heavy and polluting commercial work sites.	The Council is proposing a comprehensive treatment of these sites that will dramatically improve the overall physical environment at this location.	Preferred Option is Mixed Use Employment area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Creation of New Business Floorspace	Does not support creation of new business floorspace by S106	If there is a need for employment space, this should be met by existing designations. If de-designating floorspace results in the need to secure new floorspace through development, there is a danger that total employment land will reduce.	The Council is committed to negotiating S106 agreements as a means of improving or mitigating the effect of redevelopments.	The S106 approach will be taken through into Development Plan Preferred Options

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Defined Employment Areas	No Opinion on retention or redevelopment	Defined employment area are of borough, not strategic importance. However, to avoid the loss of necessary employment land, any changes to the boundaries of these should be as a result of a comprehensive and robust assessment of supply and need	No comment required. An employment land demand study is being compiled from current information sources.	No change proposed

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Defined Employment Areas: General Preferences for Alternative Uses	No Opinion on Alternative Uses for DEAs	As above, Defined Employment Areas are of borough importance. Changes to these designations should be criteria/assessment based and replacement uses should be appropriate to their location and need for such uses.	No response required	Preferred Option for sites not designated as Strategic Employment Locations or Defined Employment Areas will be Mixed Use Employment Areas

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Employment Clusters and Creative Industries	Supports Creative Quarters	In line with Policy 3B.9 of the London Plan, Councils should identify and support the development of clusters of creative industries and related activities and environments. The approach suggested in this paper is therefore supported.	No response required	This policy will be carried forward into the Preferred Options document

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Live/Work Developments	Supports Live/work in Town Centres	Option promoting Live/work in town centres preferred. Live-work units can be viable and acceptable development options in certain site specific circumstances. However, in the context of employment land, the loss of such land to live-work should be recognised.	The Council considers that Live/work developments are to be considered on their merits due to concerns about their continued business use.	No Preferred Option will be carried forward in to the Development Plan Documents.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Office Development	Supports larger Office development in Lewisham and Catford Town Centres	Office development potential may be limited and should be directed towards town centres. The draft East Sub-regional Development Framework indicates that in Lewisham and Catford town centres some office provision could be promoted.	No response required	Option has been carried forward into the Retail and Town Centre Section of the Core Strategy, and AAP.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Other Employment Sites	Make decision on redevelopment base on criteria	As above locally defined employment land is a borough, not a strategic issue. However, sites should only be de-designated following a comprehensive assessment of need and supply. Replacement uses should be decided on a site-by-site basis.	Most of the sites concerned are very small, and sometimes surrounded by residential uses,. Individual assessment will therefore be required.	Criteria based policy to be carried forward into the Preferred Options
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Strategic Employment Location	Supports retention of SEL boundaries	Strategic Employment Location boundaries should remain unchanged	The Council has reviewed the boundaries of the SEL at Surrey Canal Road and considers that sites that are underused and present a poor environmental quality to adjacent occupiers would make a more substantial contribution to job provision	Preferred Option revised SEL at Surrey Canal Road, Bromley Road SEL retained unchanged and designation of a number of Mixed Use Employment areas.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Strategic Employment Location: Arklow Road	Supports retention of employment uses	SEL Boundary should remain unchanged	The Council considers that this site has the potential to provide more employment on site than the current set of employment uses - especially if treated comprehensively along with the buildings on Childers Street.	Preferred Option will be Mixed Use Employment Area
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Strategic Employment Location: Bolina Road Waste Transfer	Supports retention of employment uses	SEL Boundary should remain unchanged	This site will be required for the Bermondsey Diveunder Thameslink Rail project which is now programmed to be implemented during the lifetime of this plan. It will therefore not be available for Strategic Employment Location uses.	This option will not be carried forward as a Preferred Option

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Strategic Employment Location: Childers Street	Supports retention of employment uses	SEL Boundary should remain unchanged	The Council considers that this site has the potential to provide more employment on site than the current set of employment uses - especially if treated comprehensively along with the buildings in Arklow Road Industrial Estate.	Preferred Option will be Mixed Use Employment Area
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Strategic Employment Location: Orion Business Centre	Supports retention of employment uses	SEL Boundary should remain unchanged	This site is at an important location adjacent to the future station on Phase 2 of the East London Line extension. It is not adjacent to residential uses. However it could provide a greater contribution to the regeneration of the north of the borough in	Preferred Option will be Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Strategic Employment Location: Other Plans and Programmes	General Comment	Reference should also be made to the recently published draft London Plan alterations - Planning for Waste, Planning for Minerals (October 2005). In particular, the identification of the Surrey Canal Area PIL as a potential location for strategic recycling station.	The Council will be identifying the Surrey Canal Area as its preferred location for waste facilities.	Preferred Option for Surrey Canal SEL as Preferred Waste Location

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Strategic Employment Location: Oxestalls Road	Supports retention of employment uses	SEL Boundary should remain unchanged	This site is under used, provides very few jobs, and large parts of the area are very poor in environmental quality and provides noise and pollution problems to adjacent residential occupiers. The Council considers that a comprehensive Mixed Use development is required.	Preferred Option will be Mixed Use Employment Area
16	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Strategic Employment Location: Rollins Street/Stockholm Road	Supports retention of employment uses	SEL Boundary should remain unchanged	These sites have the potential to make a strong contribution to the regeneration of North Lewisham by creating a new destination in an area that has few community facilities, increasing the number and variety of jobs provided.	The Council is proposing a Mixed Use Employment Area for these sites and a comprehensive development treatment.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
17	Michael J.L Freeman- Pinnocks		Strategic Employment Location: Oxestalls Road	Suggests new option see comments	I have been a tenant of the above address for 10 years and in the area of SE8 for 17 years. I have many issues concerning waste of allocated space i.e. from only giving homes with garden spaces to gardeners or families with children etc.	The Council is promoting a Mixed Use Employment Area on this site that would increase the numbers of jobs provided, as well as open space/amenity space housing and associated facilities such as community uses. It is uncertain whether this facility could	Mixed Use Employment Area is the Preferred Option.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
18	R Washington Young	Washington Young LLP	Strategic Employment Location: Childers Street	Supports redevelopment for Mixed Use/Employment/Housi ng	Wish to seek a new mixed use designation for the Childers Street Employment zone as highlighted in the Employment Survey dated September 2005. To strengthen the planning policy justification for mixed use development I have undertaken stakeholder consultation	The Council considers that this site has the potential to provide more employment on site than the current set of employment uses - especially if treated comprehensively along with the buildings on Childers Street.	Preferred Option will be Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
19	Deidre Mason	Honor Oak Park Association	General Comment	Comment	Planners need to respect the needs of residents and their peaceful enjoyment. Housing density is too high and further housing developments will add to pressure on services and on parking.	There is a strong emphasis in the Plan on maintaining amenity. Employment sites re considered to be in appropriate locations so as to not have an undue impact on amenity and are vital for the London wide and local economy.	No change required.
22	Alicia Hollings	Yeoman Logistics Ltd	Defined Employment Area: Plough Way	Supports redevelopment Option see comments	Either 100% housing or with some viable commercial use at ground floor which could include health crèche or other uses. Owners of site at 19 Yeoman Street - other comments 1 Regular industrial working noise.	The Council considers that various sites on the Plough Way Defined Employment Area are underused including the respondents site, and is proposing a comprehensive mixed use redevelopment involving replacement of employment uses, and in increase in the numb	Designation of this site as part of the Plough Way Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
22	Alicia Hollings	Yeoman Logistics Ltd	Defined Employment Areas	Supports individual review of Defined Employment Areas	Support review of sites on an individual basis. The Council must review defined employment land to reflect the Mayor's draft supplementary planning guidance on industrial capacity (Sept 2003)	The Council has reviewed the Defined Employment Areas on an individual basis and also the site at Yeoman Street and considers it should form part of a Mixed use Employment Area promoted for comprehensive redevelopment.	Preferred Option is a for three types of Employment Land Designation - Strategic Employment Location, Defined Employment Areas and Mixed Use Employment Areas
22	Alicia Hollings	Yeoman Logistics Ltd	Strategic Employment Location	Supports review of SEL boundaries	Ensure review of sites to ensure appropriate sites are removed/added	The Council has reviewed the boundaries of the SEL at Surrey Canal Road and considers that sites that are underused and present a poor environmental quality to adjacent occupiers would make a more substantial contribution to job provision...	Preferred Option will be Strategic Employment Location and Mixed Use Employment Areas

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
23	Pat Trembath	Sydenham Society	Defined Employment Area: Clyde Vale/Perry Vale	Supports redevelopment for Retail/commercial/Housing	Does not support maintenance of employment protection for this site. Spatial development will allow for retail, commercial below and housing above development. Plenty of scope for both commercial and housing.	It is considered that these sites perform an important local economic function and the continuation of their current use is supported.	Preferred Option to designate these sites as a Defined Employment Area.
23	Pat Trembath	Sydenham Society	Defined Employment Area: Malham Road	Supports retaining employment		It is considered that the Malham Road Defined Employment Area makes a strong and varied contribution to the local economy and that continuation of the employment use should continue	Define the Malham Road Defined Employment Area as a preferred option.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
23	Pat Trembath	Sydenham Society	Defined Employment Area: Stanton Square	Supports retaining employment	Support maintenance of employment protection. This is an industrial 'island site' and not suitable for usage other than employment.	Agree with respondents comments.	Preferred Option designation as Defined Employment Area
23	Pat Trembath	Sydenham Society	Live/Work Developments	Comment	Consideration should be given to long-term use of live./work units - how can Council enforce their usage as such after 2-3 changes of ownership - say 10 years down the line?	It is proposed that mixed use developments will be considered on their merit, and that no specific policy will be carried forward	No change

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
24	Env. Sub-Committee	Grove Park Community Group	Defined Employment Area: Manor Lane	Retain in employment use		This area is in full business use, is in an area of the borough where land in this type of use is in short supply, has recently seen new high quality business development, and should be retained in employment uses.	Preferred option is to designate this site as a Defined Employment Area
24	Env. Sub-Committee	Grove Park Community Group	Defined Employment Area: Stanton Square	Retain in employment use		It is considered that this area is suitable for retention in employment use.	Preferred option is retention as Defined Employment Area.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
24	Env. Sub-Committee	Grove Park Community Group	Defined Employment Areas	Supports release of DEA sites according to criteria and alternative mixed use proposals	Supports DEA 3 - criteria based policy for release of sites. Common sense. Judge the worth of a site by the number of employees gainfully employed. Supports mixed use commercial and residential development with a proportion of affordable housing	The Council has retained most of the DEAs in the preferred Option, either as Strategic Employment Location or DEA. Under-used sites or where there has been some loss of employment land and the area has not retained its business character and integrity	Preferred Options is a three types of Employment Land designation - Strategic Employment Location, Defined Employment Area or Mixed Use Employment Area.
24	Env. Sub-Committee	Grove Park Community Group	Employment Clusters and Creative Industries	Supports Creative Quarters	Support - but funding should not depend on 'planning gain'	It will be necessary to support these uses by planning gain - arising from redevelopment and as a means of ensuring the continued use in creative uses.	Policy will be carried forward into the Preferred Option documents

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
24	Env. Sub-Committee	Grove Park Community Group	Live/Work Developments	Refuse Live/Work in favour of Mixed Use or 100% residential		The Council is carrying forward an emphasis on this type of development in Mixed Use Employment Areas. Live/work developments to be considered on their merits.	Preferred option will be Mixed use developments.
24	Env. Sub-Committee	Grove Park Community Group	Office Development	Supports larger office development in Lewisham and Catford Town Centres		No response required	Option has been carried forward into the Retail and Town Centre Section of the Core Strategy, and AAP.
24	Env. Sub-Committee	Grove Park Community Group	Other Employment Sites	Supports individual assessment of sites for release	common sense	No response required	Criteria based policy for Other Employment Sites will be carried forward into Preferred Options

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
24	Env. Sub-Committee	Grove Park Community Group	Strategic Employment Location	No decision on whether to retain or review SEL boundaries	Don't feel qualified to make a choice. Suggestion for open space provision	The SEL boundaries have been reviewed. Some sites are proposed as Mixed Use Employment Areas which will involve some open space/amenity provision	No change in response to this comment
25	John Hamilton	Secretary of the New School Campaign	Creation of New Business Floorspace	Supports planning contributions to pay for replacement affordable floorspace		None required	This approach will be carried forward into the Preferred Options

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
25	John Hamilton	Secretary of the New School Campaign	Defined Employment Areas	Support Review of DEAs based on criteria	Support this option - need to make adjustments but overall area should not diminish	The Council has retained most of the DEAs in the preferred Option, either as Strategic Employment Location or DEA. Under-used sites or where there has been some loss of employment land and the area has not retained its business character and integrity	referred Options is a three types of Employment Land designation - Strategic Employment Location, Defined Employment Area or Mixed Use Employment Area.
25	John Hamilton	Secretary of the New School Campaign	Defined Employment Areas: General Preferences for Alternative Uses	Prefer Mixed Use	Mixed use commercial and residential development with a proportion of affordable housing and community facilities is preferred option	The Council has reviewed designated employment areas and is proposing Mixed Use Employment areas for those not designated as Strategic Employment Locations or Defined Employment Areas	Preferred Option will be Mixed Use Employment Areas

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
25	John Hamilton	Secretary of the New School Campaign	Employment Clusters and Creative Industries	Supports Creative Quarters	Sounds an excellent idea if it can work	No response required	This policy will be carried forward into the Preferred Options document
25	John Hamilton	Secretary of the New School Campaign	Live/Work Developments	Supports Live/Work in Town Centres	Existing UDP policy a good idea in both town centres and employment areas dependent on demand	It is considered that live work developments should not be allowed in employment areas as the introduction of residential uses can have an effect on continued industrial functioning. Due to concerns about ensuring their continued business use, live/work	No Preferred Option will be carried forward in to the Development Plan Documents.
25	John Hamilton	Secretary of the New School Campaign	Other Employment Sites	Supports redevelopment for these sites on basis of criteria	We feel that generally smaller sites should be retained but there may be good reasons for change of use in some circumstances	The Council will be introducing a criteria based policy to account for situations where a change of use might be required.	Criteria based policy in Preferred Options

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
25	John Hamilton	Secretary of the New School Campaign	Strategic Employment Location	Support review of SEL boundaries	There may be a need to make adjustments but overall proportion of land should be unchanged.	The Council has reviewed the boundaries of the SEL at Surrey Canal Road and considers that sites that are underused and present a poor environmental quality to adjacent occupiers would make a more substantial contribution to job provision...	Preferred Option will be Strategic Employment Location and Mixed Use Employment Areas
25	John Hamilton	Secretary of the New School Campaign	Strategic Employment Location: Oxestalls Road	Supports Mixed Use redevelopment for employment, housing and community use	We prefer an option which would retain most of the site for employment purposes but allow for the central section of the site, owned by Law 2380 and not occupied by Safestore and Studley Commercial to be used for community use.	The Council has now presented a series of options for other sites to locate the secondary school required to meet school provision for the north of the borough. The sites at Oxestalls Road are considered suitable for a mix of uses as part of a comprehensive	The Council's Preferred Option is to designate this area as a Mixed use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
25	John Hamilton	Secretary of the New School Campaign	Strategic Employment Location: Oxestalls Road	Comment on Mixed Use option for Victoria and Bridge Wharfs	This option advised by the landowner has a couple of inaccuracies. They imply they would like to develop the whole of the Oxestalls Road site and that they would like this to be 'led' by high quality, high density residential development.	The Council will be promoting a comprehensive Mixed Use development that will meet all the aims discussed by the respondent. The Council will be requiring affordable housing as part of the development	Preferred Option is Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
26	James Amos	Hepher Dixon	Defined Employment Areas	Supports release of some DEAs according to criteria	This option allows the removal of some sites from the DEA designation, depending on certain criteria to be the favoured option, particularly in the north of the borough where pressure for development is at its greatest	The Council has reviewed the sites within the DEA designation. Some sites have been assigned to Strategic Employment Location designation, some are Mixed Use employment Areas, and some will continue as DEAs.	Preferred Option for three types of designated employment Areas

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
26	James Amos	Hepher Dixon	Defined Employment Areas: General Preferences for Alternative Uses	Supports Mixed use Commercial and residential (with 50% affordable housing)	Business development has a role to play in regeneration, but ideally in combination with both private and affordable housing which would add to the mix of uses in the area and which will act as the greatest incentive to new investment.	The Council supports this position on Defined Employment Areas proposed for redevelopment. The Council is considering the level of affordable housing provision elsewhere in the Preferred Options	Preferred Option is for Mixed use Employment Area designation on this site.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
26	James Amos	Hepher Dixon	Other Employment Sites	Release sites according to criteria	This is preferable because it allows sites to be judged individually, and which would allow a structured release of land to meet housing and other needs as they arise. The criteria for release are identified in the paper.	A general criteria based policy will be introduced - the appropriate alternative uses will vary according to the location of the site.	Criteria based policy to be carried forward in to Preferred Options

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
26	James Amos	Hepher Dixon	Strategic Employment Location	Supports review of SEL boundaries	We support the Council's initiatives in protecting employment land for employment purposes. However, we believe that there are circumstances where some employment sites in areas of mixed character are no longer suitable for that use...	No response required.	Preferred Option will be review of SEL boundaries at Surrey Canal Road and designation of Mixed Use Employment Areas to improve the offer of some sites.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
26	James Amos	Hepher Dixon	Strategic Employment Location: Arklow Road	Supports Mixed use	We believe that in the context of the regeneration of Deptford, the poor quality of the existing sites at Arklow Road and the low level of jobs provision provided that there is a significant opportunity to bring forward a major mixed use redevelopment...	The Council will be promoting the comprehensive redevelopment of this site as a Mixed Use Employment Area	Preferred Option will be mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
26	James Amos	Hepher Dixon	Strategic Employment Location: Arklow Road	Supports mixed Use Employment/Live/work /housing	ARK 4 proposes a mixed use employment, live work units and housing allocation. We would also offer support for this option which reflects recent permission in the area and recent proposals for the Donway building.	The Council will be promoting the comprehensive redevelopment of this site as a Mixed Use Employment Area	Preferred Option will be mixed Use Employment Area
26	James Amos	Hepher Dixon	Strategic Employment Location: Arklow Road	Supports mixed Use Employment/Housing	We would also offer support for ARK3 which suggests a mixed use employment, housing and community use for the site.	The Council will be promoting the comprehensive redevelopment of this site as a Mixed Use Employment Area	Preferred Option will be Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
26	James Amos	Hepher Dixon	Strategic Employment Location: Arklow Road	Supports redevelopment for housing and community facility	We would also offer support for ARK 2 which would allocate the site for housing and a community facility	The Council would wish to ensure that any redevelopment will replace the valuable jobs that exist on this site, and does not therefore support this option.	The Preferred Option for this site will be a Mixed Use Employment Area which will replace the employment on the site.
31	David Lane	DLA Town Planning LTD	Defined Employment Area: Plough Way	Supports redevelopment with new option described in comments	Promote Mixed Use Allocation of the Cannon Wharf Business Centre, the Insulcrete Works and former Salters Paper Mill. It is proposed that this site of 3 ha. be allocated for employment/residential purposes. Employment Use: Modern Class B1 office and industrial	The Council considers that various sites on the Plough Way Defined Employment Area are underused or would benefit for redeveloped buildings including the respondents site, and is proposing a comprehensive mixed use redevelopment	Designation of this site as part of the Plough Way Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
32	Ash Patel	Sharps Global Trading Ltd	Defined Employment Area: Goodwood Road	Supports Housing and Mixed Use Housing and Commercial uses	Problems with lorries delivering goods - this is a major problem. An alternative use could be light commercial maybe.	Goodwood Road Defined Employment Area has lost part of its B Use Class base and has become fragmented. It is in important town centre location where the Council is seeking to regenerate the local environment...	Preferred Option will not be designation of Defined Employment Area and will be covered by the 'other Employment Area' policy which is supportive of new commercial uses in Town Centre locations.
33	T.C. Chapman	Bromcom Computers PLC	Defined Employment Area: Worsley Bridge Road	Supports retention in employment use	Bromcom Computers plc occupies two floors extending to approximately 20,000 square feet of Kelvin House, a three storey largely office block built in the 1960's with an adjoining car park. The Company employs 115 people on site.	It is considered that this site performs a valuable function in the local economy and is suitable for continued office/light industrial use.	Designate Worsley Bridge Road as a Defined Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
35	Mr K. Rope	Diamond Glass & Glazing Sth Ltd	Defined Employment Area: Goodwood Road	Supports retention in Employment Use	Retain employment. Because we need to keep trades local to London giving a close service to the community	Goodwood Road Defined Employment Area has lost part of its B Use Class base and has become fragmented. It is in important town centre location where the Council is seeking to regenerate the local environment...	Preferred Option will not be designation of Defined Employment Area and will be covered by the 'other Employment Area' policy which is supportive of new commercial uses in Town Centre locations.
40	C V Sayers		Employment Clusters and Creative Industries	Supports Creative Quarters	I am not clear on how the LBL can create 'creative quarters' - but they should encourage properly serviced facilities where self employment can flourish wherever in the borough.	This will be encouraged by various means including S106 agreements	Policy will be carried forward into the Preferred Option documents

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
42	Barton Willmore Planning Partnership	Coventry Scaffolding Limited	Defined Employment Area: Stanton Square	Supports redevelopment for Mixed use commercial and residential	<p>We write re 443-449 and 471 Southend Lane which forms part of the Stanton Square Employment Area, to seek its removal from its current employment status for the following reasons:</p> <p>1. the surrounding area is predominantly residential in nature and character</p>	<p>It is considered that this area is suitable for continued industrial use and is in an area of the borough where land of this nature is in short supply. The site is surrounded by busy roads. Nos 443 - 449 and 471 Southend Lane are not adjacent to any re</p>	<p>Preferred Option is to designate Stanton Square as a Defined Employment Area.</p>

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
43	Paul Russell Associates	Russell Associates	Strategic Employment Location: Grinstead Road (Parkside House)	Supports New Option for redevelopment - see comment	The existing site has a vacant two storey former office block (B1 use), and the surrounding area, which was presumably the former car park is now partially occupied by a scaffolding yard. To the left of the site is residential with a part 3, part 4 store	This site is at an important location which could both make a more positive contribution to the environment and increase the numbers of jobs provided.	Preferred Option will be Mixed Use Employment Area

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
44	G Rowlands		Defined Employment Areas	Supports redevelopment for mixed use commercial and residential	Allow 'mixed use' commercial and residential with affordable housing, also consider community facilities - would allow more flexibility	The Council has retained most of the DEAs in the preferred Option, either as Strategic Employment Location or DEA. Under-used sites or where there has been some loss of employment land and the area has not retained its business character and integrity	Preferred Options is a three types of Employment Land designation - Strategic Employment Location, Defined Employment Area or Mixed Use Employment Area.
45	Mrs. June Broome	St. Mary's Conservation Area	Defined Employment Areas	Supports criteria based review of DEAs a, allow for mixed use redevelopment including housing, and creation of new floorspace through S106 agreements	Does not support retention of all DEAS in employment use, the removal of protection from all areas, 100% housing, or 100% affordable housing in these areas	The Council has retained most of the DEAs in the preferred Option, either as Strategic Employment Location or DEA. Under-used sites or where there has been some loss of employment land and the area has not retained its business character and integrity	Preferred Options is a three types of Employment Land designation - Strategic Employment Location, Defined Employment Area or Mixed Use Employment Area.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
45	Mrs. June Broome	St. Mary's Conservation Area	Employment Clusters and Creative Industries	Supports Creative Quarters	Support - but too little attention is given to creative activities generally in the whole policy	No response required	Policy will be carried forward into the Preferred Option documents
45	Mrs. June Broome	St. Mary's Conservation Area	Live/Work Developments	Supports use of older buildings for Live/work units but not option for Live/work units in town centres	Do not agree with live/work units - an excuse to get away with substandard housing	Developments will be judged on their merits in appropriate buildings	o Preferred Option will be carried forward in to the Development Plan Documents.

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
45	Mrs. June Broome	St. Mary's Conservation Area	Other Employment Sites	Supported review of sites using criteria	Agree allow mixed use commercial and housing or 100% housing on these sites and assess applications for their redevelopment flexibly on the basis of criteria. Did not agree to preserve all these sites in business/industrial use	The Council will be introducing a criteria based policy to account for situations where a change of use might be required.	Criteria based policy to be carried forward into the Preferred Options
45	Mrs. June Broome	St. Mary's Conservation Area	Other Employment Sites	Supports small sites - see comments	Provision to allow for small non-polluting industries etc. in residential areas	A criteria based policy to enable continuation of these uses on appropriate sites will be introduced.	Criteria based policy to be carried forward into the Preferred Options

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
45	Mrs. June Broome	St. Mary's Conservation Area	Strategic Employment Location	Supports review of SEL boundaries	Agreed with Option E2 to review the boundaries of Strategic Employment Locations. E1 (maintain current boundaries) thought to be too rigid.	The Council has reviewed the boundaries of the SEL at Surrey Canal Road and considers that sites that are underused and present a poor environmental quality to adjacent occupiers would make a more substantial contribution to job provision.	Preferred Option will be Strategic Employment Location and Mixed Use Employment Areas
46	Tim Lord	Sydenham Citizens Advice Bureau	General Comment	General Comment	More emphasis needed on promoting and protecting affordable housing	The Council considers that sufficient sites will be allocated in the Plan to meet targets for housing provision which is discussed in the Housing Chapter of the Strategy	No change proposed

Form	Name	Organisation	Option Title	Option Choice	Comment	Response	Proposed Change
47		Peter Barber Architects	Defined Employment Area: Endwell Road	Support Redevelopment for 'Mixed Use Creative Mews'	They advise that serious problems have occurred on the scaffolding use of part of this site called Martins Yard over the past decade, including noise nuisance, lorry movements, yard based work and smoke and fumes from incineration.	Retain as defined local employment location.	As per officer response.

# TRANSPORT

LIST OF RESPONDENTS FOR **TRANSPORT & PARKING** ISSUES AND OPTIONS CONSULTATION

RESPONDENTS IDENTIFICATION NUMBER	RESPONDENT
1	Phillip Shepperd, Ladywell Society
2	Michelle Barry, RPS group
3	David Walker, Blackheath Society
4	MG Bacchus, Telegraph Hill Society
5	Roger Stocker, Lewisham Cyclists
7	CGMS Ltd, Metropolitan Police Department
8	Councillor Ingleby, London Borough of Lewisham
9	Andrew Reid, Tewkesbury Lodge Estate
10	Deidre Mason Honor Oak Park Assoc
11	Env. Sub Committee, Grove Park Community Group
12	Sarah Hampton, Rapleys LLP
13	P. Keywood, Martin Robeson Planning Practice
14	Roger Pickett, Diocese of Southwark
15	Charles Batchelor, Lee Manor Society
24	Ian Plowright, London Borough of Lewisham
29	Tim Wild, Sydenham Citizens Advice Bureau
30	C V Sayers, 71 Leyland Road
37	Pam Butler, Network Rail
47	Charlotte Naicker, Pollution Control Group, LBL
57	Paula Carney, RPS Planning
65	Cllr Robert Massey, London Borough of Lewisham
66	Christine McGoldrick, Strategic Planning Manager, Greater London Authority
71	Ivan Pasalich, Environment Agency

## Schedule of Representations

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
1	Phillip Shepperd	Ladywell Society	Option TR1	Gearing of transport flows to traffic usage at different times of the day/week/year.	Noted. Road hierarchy generally reflects traffic flows.	Preferred options will seek to connect transport flows to traffic use in accordance with a road hierarchy.
1	Phillip Shepperd	Ladywell Society	Option TR2, TR3	Thresholds dependant on use. Development plans should give the Council sufficient flexibility to require a transport assessment and travel impact statement for any new development if it deems that it is appropriate to do so.	Agree.	Requirements for a transport assessment/travel impact statement (TIA) will be in accordance with PPG13 - those developments having a significant impact. A small scale development may have a significant transport impact dependant on its location. For this reason thresholds will not be specified in the preferred option.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
1	Phillip Shepperd	Ladywell Society	Option TR4 Q3	Thresholds dependant on use. Development plans should give the Council sufficient flexibility to require a transport assessment and travel impact statement for any new development if it deems that it is appropriate to do so.	Agree.	Requirements for a transport assessment/travel impact statement (TIA) will be in accordance with PPG13 - those developments having a significant impact. A small scale development may have a significant transport impact dependant on its location. For this reason thresholds will not be specified in the preferred option.
1	Phillip Shepperd	Ladywell Society	Option TR4 Q4	Thresholds dependant on use. Development plans should give the Council sufficient flexibility to require a transport assessment and travel impact statement for any new development if it deems that it is appropriate to do so.	Noted.	See above.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
1	Phillip Shepperd	Ladywell Society	Option TR7	Gear road hierarchy to traffic flows at different times of the day.	Noted. Road hierarchy generally reflects traffic flows.	Preferred options will seek to connect transport flows to traffic use.
1	Phillip Shepperd	Ladywell Society	Option TR 18	There should be an overall view of transport routes, and these should be monitored to gauge use.	Noted.	The preferred option should reflect that the Council will need to work with transport operators to ensure effective delivery of services and the promotion of public transport.
1	Phillip Shepperd	Ladywell Society	Option TR 19, TR 20	Increase bus lanes and restrict cars using Town Centre.	Noted. The use of bus lanes across the Borough and traffic management in town centres is included in the Local Implementation Plan - the Borough's Transport Strategy.	Preferred options seek to minimise car parking provision in areas of good public transport
2	RPS Planning	RPS Planning	Option TR1	Option TR1 in effect would be a plot ratio policy, which is not supported. Accessibility considerations need to be looked at on a site by site basis which can take account all the implications of each development.	Noted. Option does not include a plot ratio policy.	No change. Option is consistent with National and Regional policy and guidance. All applications would be assessed on their merits

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
						subject to suitable criteria.
2	RPS Planning	RPS Planning	Option TR5	TR5 should not be pursued as it could cause unreasonable financial burdens. TR6 - Developers should normally only be required to meet the immediate transport improvements related to the development although in many cases there should be no requirement whatsoever.	TR5 and TR6 are in accordance with Circular 05/05, which provides guidance to Local Planning Authorities on the use of planning obligations.	No change. Council will seek planning obligations where they are considered reasonable and necessary, and in accordance with national policy guidance.
2	RPS Planning	RPS Planning	Options TR9, TR10, TR11	TR9, TR10, TR11. UDP car parking standards should continue to be used. Car free residential development should be allowed if developer considers it appropriate. London Plan standards should not be adopted.	LDF policies need to be in general conformity with the regional development plan - in this case the London Plan.	Car free development will be promoted as part of the transport preferred options, subject to suitable criteria. London Plan standards will be adopted to ensure consistency with the regional development plan.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
2	RPS Planning	RPS Planning	Option TR14	TR 14 - Developers should have the option of promoting car free residential development in areas with excellent public transport facilities but Option TR14 should be an option for developers not a requirement by the local authority.	Noted.	Car free development will be promoted, not enforced, as part of the transport preferred options.
2	RPS Planning	RPS Planning	Option TR15	TR15 - Do not agree that there should be minimum parking provision in relation to all residential developments. Car parking needs to be looked at in relation to public transport facilities and there will be cases where a low or no provision needs to be made.	Agree.	Car free development will be promoted, not enforced, as part of the transport preferred options, subject to a range of suitable criteria.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
3	David Walker	Blackheath Society	Option TR1	Suggest 10 minute walking time to public transport as criteria for allowing higher density development.	Noted.	Walking will be included as an accessibility criteria, but difficulty in stating a 10 minute walking time. This will be dependant on a range of factors including walking pace, topography, exact location of development to public transport etc.
3	David Walker	Blackheath Society	Option TR4	The Council should require Green Travel Plans and the threshold should be 10 employees.	Noted.	Preferred option will seek travel plans where a development will have a significant transport implication. Not just dependant on employee numbers but operating hours, location, intensity of use, visitor numbers etc.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
3	David Walker	Blackheath Society	Option TR9, TR10, TR11.	If public transport is poor there should be a case for less restrictive car parking to assist regeneration areas.	Noted.	Car free development will be promoted as part of the transport preferred options, subject to a range of suitable criteria. Car parking rates are also a maximum not a minimum.
3	David Walker	Blackheath Society	Options TR16, TR17	If there is local demand, CPZs should be extended.	Noted.	CPZs are implemented subject to assessment and are included as part of the Local Implementation Plan. There is always public consultation before a CPZ is adopted.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
4	MG Bacchus	Telegraph Hill Society	Option TR1	TR1 will ensure that places with poor public transport remain poor whilst encouraging service providers to provide more public transport at those places where transport services are good.	Noted. The first locational choice for major development should be those areas with good accessibility to public transport. Through the use of planning obligations transport services can be improved and contributions sought relative to the scale of development. Council will work with relevant transport providers to ensure effective delivery to all parts of the borough. Requirements for a transport assessment/travel impact statement will be in accordance with PPG13 - those developments having a significant impact.	No change.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
4	MG Bacchus	Telegraph Hill Society	Options TR2, TR3	Thresholds dependant on use. Development plans should give the Council sufficient flexibility to require a transport assessment and travel impact statement for any new development if it deems that it is appropriate to do so.	Noted.	Requirements for a transport assessment/travel impact statement will be in accordance with PPG13 - those developments having a significant impact. A small scale development may have a significant transport impact dependant on its location. For this reason thresholds will not be specified in the preferred option.
4	MG Bacchus	Telegraph Hill Society	Option TR4 Q3	Council should have flexibility to require a GTP.	Agree.	Preferred option will be drafted to permit flexibility in seeking a GTP.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
4	MG Bacchus	Telegraph Hill Society	Option TR4 Q4	It is suggested that all planning applications should require the applicant to give an indication of the number of people estimated to be visiting the completed development on a daily basis. This will give some indication as to whether a GTP should be required.	Agree.	Preferred option will be drafted to permit flexibility in seeking a GTP.
4	MG Bacchus	Telegraph Hill Society	Option TR7	Strongly in favour of a rigid road hierarchy which is adhered to. As Society we have strongly resisted any traffic plan which seeks merely to move traffic from one residential street to another or moves traffic down the road hierarchy.	Noted. Road hierarchy generally reflects traffic flows.	Preferred options will seek to connect transport flows to traffic use in accordance with a road hierarchy.
4	MG Bacchus	Telegraph Hill Society	Option TR8	Happy with educational measures and would ask the Council to improve its enforcement measures. Support engineering measures provided they do not conflict with the road hierarchy.	Noted. Such measures are included in the Local Implementation Plan and supported through the LDF.	No change.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
4	MG Bacchus	Telegraph Hill Society	Option TR12	Cycle provision is inexpensive and there is no reason therefore why cycle provision cannot be provided. In single dwellings it could be justified for the cycle provision to be no more than adequate space inside the property or its garages for cycles. It does not have to be, and indeed ideally should not be, external cycle provision.	Agree.	Preferred options will include the need for cycle provision.
4	MG Bacchus	Telegraph Hill Society	Options TR16, TR17	Society is emphatically against the extension of CPZs except in small targeted areas where there is a specific problem e.g. Lewisham Town Centre. The question should not presuppose that CPZs are either wanted or desired by residents or businesses either in existing areas or in new developments.	Noted. No decision on implementing a CPZ will be taken without full consultation with local people.	CPZs will be pursued as a preferred option.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
4	MG Bacchus	Telegraph Hill Society	Option TR 19 & TR 20	Support extension to East London line to Clapham Junction. Support re-opening of Brockley High Level Station.	Noted. Council can only support in its LDF documents those transport schemes that have received funding. The reopening of the Brockley High Level Station has been discussed with TfL and the local MP. Rail plans and new developments in the South East and East London have made it possible for the station proposals to be considered in the future rail strategy being developed by TfL.	No change, however preferred option will support working with transport providers to ensure public transport delivery.
5	Roger Stocker	Lewisham Cyclists	Option TR1	Consideration should be given to other criteria e.g. walking distance to transport links, location and distance from cycle network, distance from schools and public transport.	Noted.	Preferred option will consider a range of criteria to determine accessibility.
5	Roger Stocker	Lewisham Cyclists	Option TR2, TR3	Assess all travel modes in relation to development.	Noted.	Agree. Preferred options will include accessibility by all modes of transport, including walking and cycling.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
5	Roger Stocker	Lewisham Cyclists	Option TR4 Q3	Thresholds should be based on the size of a development in square metres and the number of people employed.	Noted.	Preferred option will be drafted to permit flexibility in seeking a GTP.
5	Roger Stocker	Lewisham Cyclists	Option TR5 & TR6	Pool together developers funding from nearby planning applications.	Noted. Planning obligations will be sought and used in accordance with National policy guidance.	No change.
5	Roger Stocker	Lewisham Cyclists	Option TR7	Roads to be assessed for their designed usage - local roads should be assigned for local traffic and not a through routes - roads are not just for motorized vehicles and should be designed to reduce vehicle speeds to a minimum e.g. home zones.	Agree. Forms part of proposals detailed in the Local Implementation Plan - the Borough's Transport Strategy.	No change.
5	Roger Stocker	Lewisham Cyclists	Option TR8	Different methods should be used to cut down speed and traffic volumes.	Agree. Forms part of proposals detailed in the Local Implementation Plan - the Borough's Transport Strategy.	No change.
5	Roger Stocker	Lewisham Cyclists	Option TR 18	Change of use applications should be subject to the same conditions as new developments.	Noted. Applications will be assessed accordingly to relevant policies and transport facilities safeguarded.	No change.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
5	Roger Stocker	Lewisham Cyclists	Comments	Walking and cycling improvements should be key in all new developments. Only through this can modal shift towards sustainable transport be achieved. All new developments should also be assessed for public transport links and private car parking (except disabled) kept to a minimum. Quicker more accessible routes for sustainable modes should be promoted to dissuade private car journeys. All new developments should have a detailed traffic survey to help map the borough for transport use - only through these can changes be understood.	Agree. Relevant assessments and statements will need to be submitted with applications to determine accessibility and how car use will be reduced.	Preferred options will emphasise the importance of walking and cycling and accessibility through sustainable transport modes.
7	CGMS Ltd	Metropolitan Police Department	Comments	The MPA requests that the Council's car parking standards recognise that the operational requirements of certain uses dictate car parking needs. This include certain police facilities.	Noted.	The preferred options will adopt London Plan rates, however, there is scope for negotiation depending on use.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
8	Councillor Ingleby	LBL	Option TR1	Walking distance to railway stations should be used to determine accessibility.	Agree.	A range of criteria will be used to determine accessibility.
8	Councillor Ingleby	LBL	Option TR4 Q3	A Green Travel Plan should be sought for businesses with 15+ employees.	Noted.	Preferred option will be drafted to permit flexibility in seeking a GTP.
9	Andrew Reid	Tewkesbury Lodge Estate	Option TR1	Potential to improve public transport should also be considered when evaluating potential developments.	Noted.	Preferred options will ensure improvements to public transport are considered as part of large scale developments.
9	Andrew Reid	Tewkesbury Lodge Estate	Options TR2, TR3	Base thresholds on the number of potential new travellers from the development. A large low density development might have less transport impact than a smaller high density one.	Noted.	Requirements for a transport assessment/travel impact statement will be in accordance with PPG13 - those developments having a significant impact. For this reason thresholds will not be specified in the preferred option.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
9	Andrew Reid	Tewkesbury Lodge Estate	Option TR4 Q3	The number employed by a business should be used as a threshold to determine whether a green travel plan is required.	Noted.	Preferred option will be drafted to permit flexibility in seeking a GTP.
9	Andrew Reid	Tewkesbury Lodge Estate	Options TR5, TR6	TR5 has hidden tax implications. Transport infrastructure should be developed in line with demand	TR5 is in accordance with Circular 05/05, which provides guidance to Local Planning Authorities on the use of planning obligations. Council will seek planning obligations where they are considered necessary and in accordance with national policy guidance.	No change.
9	Andrew Reid	Tewkesbury Lodge Estate	Option TR7	Support road hierarchy but am aware of cases where UDP hierarchy has been ignored by TfL and adjoining borough Southwark to detriment of residents - forcing traffic onto lower hierarchy roads.	Noted. Road hierarchy generally reflects traffic flows.	Preferred options will seek to connect transport flows to traffic use in accordance with a road hierarchy. Implementation will be through the Local Implementation Plan.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
9	Andrew Reid	Tewkesbury Lodge Estate	Option TR8	Must accept that road safety cannot be entirely achieved by engineering solutions.	Agree. The Local Implementation Plan seeks to address transport issues through a range of measures, including education and other non-engineering solutions.	No change.
9	Andrew Reid	Tewkesbury Lodge Estate	Options TR14, TR15	It's unrealistic at present to go for zero parking. However, the limited provision could be made expensive.	Noted. The Council does not regulate the price/cost of parking for private development.	Car free development will be promoted as part of the transport preferred options, subject to a range of suitable criteria.
9	Andrew Reid	Tewkesbury Lodge Estate	Options TR16, TR17	CPZ should only be introduced where they will reduce number of vehicles.	Noted. No decision on implementing a CPZ will be taken without full consultation with local people.	CPZs will be pursued as a preferred option.
9	Andrew Reid	Tewkesbury Lodge Estate	Comments	Whilst excellent public transport should be a major objective, a proportion of car use is required. Road systems need to enable movement by car where this is appropriate.	Noted.	Preferred options will reflect London Plan policies and emphasise public transport whilst providing for the car.
10	Deidre Mason	Honor Oak Park Association	Comments	Engineering measures to make roads safer could be very beneficial, as long as access for public transport and emergency vehicles is taken into account.	Noted. These matters are included in the Local Implementation Plan - the Borough's Transport Strategy.	Emergency vehicle access will be included as criteria in relevant assessments.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
10	Deidre Mason	Honor Oak Park Association	Comments	Over-proliferation of bus-lane and speed cameras may distract drivers.	Noted. Outside the remit of the LDF. A matter for the Local Implementation Plan - the Borough's Transport Strategy, and TfL.	No change.
10	Deidre Mason	Honor Oak Park Association	Comments	Car-free developments may be difficult for tradesmen.	Noted. Car free development usually provides parking space for tradesman and the like. Each application is assessed on its merits and there is the opportunity for limited parking to be provided.	No change.
10	Deidre Mason	Honor Oak Park Association	Comments	CPZ bring similar problems and need full support from local residents.	Noted. No decision on implementing a CPZ will be taken without full consultation with local people.	CPZs will be pursued as a preferred option.
11	Environment Sub-Committee	Grove Park Community Group	Option TR1	Good public transport does not justify higher density development if the local infrastructure is poor e.g. schools, shops, medical health care etc.	Agree. Planning obligations will be sought for works or funds for relevant infrastructure/services which are required as a result of development, in order to meet additional demand.	No change.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
11	Env. Sub Committee	Grove Park Community Group	Options TR2 , TR3	Base thresholds on number of residential units.	Noted.	Requirements for a transport assessment/travel impact statement will be in accordance with PPG13 - those developments having a significant impact. A small scale development may have a significant transport impact dependant on its location. For this reason thresholds will not be specified in the preferred option.
11	Environment Sub-Committee	Grove Park Community Group	Options TR5, TR6	Public transport should carry out changes to improve public transport services.	Noted. LBL will seek improvements to public transport where they are related to a particular development and additional demand is created. Transport improvements are also included and promoted as part of the Local Implementation Plan - the Borough's Transport Strategy.	LBL will also work with transport providers to ensure services are provided, maintained and enhanced.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
11	Environment Sub-Committee	Grove Park Community Group	Option TR7	Improve management of traffic.	Noted. Transport improvements and traffic management strategies are included and promoted as part of the Local Implementation Plan - the Borough's Transport Strategy.	No change.
11	Environment Sub-Committee	Grove Park Community Group	Option TR8	Improve quality and education of transport engineers.	No comment. Transport improvements and traffic management strategies are included and promoted as part of the Local Implementation Plan - the Borough's Transport Strategy.	No change.
12	Sarah Hampton	Rapleys LLP	Option TR4 Q4	Base thresholds on the number of visitors and likely length of stay - long term and short term parking.	Noted.	Preferred option will be drafted to permit flexibility in seeking a GTP.
13	P Keywood	Martin Robeson Planning Practice	Option TR2	Thresholds are a useful way of regulating when TIAs are necessary. They provide a consistent approach for all.	Noted.	Requirements for a TIA will be in accordance with PPG13 - those developments having a significant impact. A small scale development may have a significant transport impact dependant on its location. For this

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
						reason thresholds will not be specified in the preferred option.
13	P Keywood	Martin Robeson Planning Practice	Option TR4 Q3	Thresholds based on square metreage is more measurable and definitive.	Noted.	Preferred option will be drafted to permit flexibility in seeking a GTP.
13	P Keywood	Martin Robeson Planning Practice	Option TR8	Education for all users - children, adults, walkers, drivers, cyclists is critical. Engineering can stop people having to think for themselves about risks and dangers.	Noted. Education strategies are included and promoted as part of the Local Implementation Plan - the Borough's Transport Strategy.	No change.
14	Roger Pickett	Diocese of Southwark	Option TR1	As well as PTAL data, walking distances should also be incorporated within the determining criteria.	Noted.	Walking will be included as an accessibility criteria.
14	Roger Pickett	Diocese of Southwark	Option TR5	It is only by having a properly well devised public transport network that the policy of increased densities will work in practice.	Agree.	Preferred options will promote public transport and LBL will work with transport providers to ensure services are provided, maintained and enhanced.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
14	Roger Pickett	Diocese of Southwark	Option TR10	There is a need to incorporate within any emerging policy provision for short term parking in all neighbourhoods to provide visitors and those providing services to residents.	Noted.	Parking policies will adopt the standards from the London Plan. Short term parking will be assessed on its merits.
14	Roger Pickett	Diocese of Southwark	Option TR19	Wider transport issues across the whole of London must be integrated with the specific needs of local residents. It is only in this way that the needs of local residents and the entire population of London can be properly met in way that will enable a higher density dwelling policy to work.	Agree. Transport policies seek to integrate transport and development. Implementation of transport strategies is primarily through the Local Implementation Plan - the Borough's local transport strategy.	Preferred options will be drafted to reflect this aim.
15	Charles Batchelor	Lee Manor Society	Option TR4	Council should seek to require a GTP, rather than merely encouraging them.	Agree.	A GTP will be required for certain development depending on use and location.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
24	Ian Plowright	London Borough of Lewisham	Comments	Need to link Air Quality with road traffic. Lewisham not likely to hit NO2 and PM10 objectives. The major source of these two pollutants is road traffic.	Agree. Air quality issues will be addressed in other parts of the LDF. Council can require an air quality assessment for certain developments. The LDF aims to integrate the location of development with public transport in an effort to reduce the use of the car, and promotes walking and cycling as sustainable modes of transport - further impacting air quality.	Preferred options will be drafted to reflect this aim.
24	Ian Plowright	London Borough of Lewisham	Comments	Distance from a station has the benefit of being more understandable to the lay person, it does not necessarily reflect the true pattern of public transport accessibility.	Agree.	A range of criteria will be used to determine accessibility.
24	Ian Plowright	London Borough of Lewisham	Comments	Aims for parking standards should work with controlling the supply of off-street parking and traffic management.	Agree.	Parking standards will adopt those from the London Plan.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
24	Ian Plowright	London Borough of Lewisham	Comments	<p>Road hierarchy is an outdated concept. Reacknowledge multiuse streets and need a classification system. Need to define the types of street activity we would seek to foster and support in the types of street in the hierarchy. Streets can be considered a series of places. Classifying streets as roads (movement corridors) denied the significance/differing significance of these places. This results in conceptualising the same place/length of street differently in UDPs where there are maps designated places (Major, District, etc centres) and elsewhere the high streets at the centres are designated as distributor corridors without any acknowledgment of place. There needs to be a two dimensional classification system that acknowledges both 'passage' and 'place' significance.</p>	Noted. Road hierarchy generally reflects traffic flows.	Preferred options will seek to connect transport flows to traffic use in accordance with a road hierarchy.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
24	Ian Plowright	London Borough of Lewisham	Comments	The LIP and LDF should support each other on CPZs.	Noted.	The preferred options will be consistent with relevant supporting documents.
37	Pam Butler	Network Rail	Option TR1	Network Rail supports Option TR1 as it is designed to encourage growth around major transport nodes, which is essential to reducing reliance on the car and curbing pollution from road traffic. Network Rail is funded to maintain the existing railway and do not have monies for enhancements. We would welcome support from the Council to improve stations and facilitate minor infrastructure projects to cope with growth. High density development, incorporating mixed use activities around stations, could directly (where Network Rail estate land is used) or indirectly (through Section 106 contributions) support station improvement works.	Noted.	Preferred options will promote public transport and LBL will work with transport providers to ensure services are provided, maintained and enhanced. Planning contributions will be sought when necessary.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
37	Pam Butler	Network Rail	Comments	Network Rail supports Option TR1 as it is designed to encourage growth around major transport nodes, which is essential to reducing reliance on the car and curbing pollution from road traffic. *High density development, incorporating mixed use activities around stations, could directly (where Network Rail estate land is used) or indirectly (through Section 106 contributions) support station improvement works.	Noted.	Planning obligations will be sought and used in accordance to National policy guidance.
37	Pam Butler	Network Rail	Options TR5, TR6	Network Rail considers it is not reasonable for proximity to be the only determinant of whether contributions should be applied to new developments. The main issue is the additional demand for the service which requires new investment. Network Rail considers that it would be reasonable to provide for the pooling of contributions that are taken from developments in order to fund significant	Noted.	Planning obligations will be sought and administered in accordance with government guidance and Council policy. The Planning Obligations SPD will soon be prepared and will provide guidance on this issue.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
				improvements to transport infrastructure.		
37	Pam Butler	Network Rail	Option TR18	Network Rail supports Option TR18 to the extent that it applies to its operational interests but reserves the right to make decisions based on its own operational interests when required.	Noted.	Preferred options will be drafted to reflect this aim.
47	Charlotte Naicker	Pollution Control Group, LBL	Comments	Strategic development plans have the potential to reduce air quality impacts in the long term through locating residential, employment and leisure land uses in such a way as to reduce the need to travel.	Agree. Preferred options seek to maximise transport accessibility and reduce the need to travel by car.	Preferred options will be drafted to reflect this aim.
47	Charlotte Naicker	Pollution Control Group, LBL	Comments	Other considerations include policies to restrict parking in certain areas, or the promotion of car free housing developments in suitable locations where public transport provisions are dominant.	Agree.	Preferred options seek to achieve these aims.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
47	Charlotte Naicker	Pollution Control Group, LBL	Comments	The land use planning system has a vital role to play in ensuring that the objectives of the Air Quality Strategy are met. To ensure that the land use planning system makes an appropriate contribution, it is important to recognise the links between air quality and land use planning and traffic management, these all being important tools in the Council's Action Plan.	Agree.	The LDF seeks to reflect and implement the strategies and objectives of other documents. This will be reflected in the preferred options.
57	Paula Carney	RPS Planning	Comments	Recommend thresholds are set for developments that require the submission of Transport Assessments, but that a Travel Plan Framework is prepared as part of a planning application to represent a Statement of Intent and the final presentation of the Travel Plan be a condition of the planning approval.	Noted.	Preferred options will be drafted to ensure effective implementation.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
57	Paula Carney	RPS Planning	Comments	<p>It is important that the cumulative impacts of development are addressed not only by the Council but also those undertaking the development.</p> <p>Notwithstanding, it would be unrealistic to expect development to fund the full upgrading of infrastructure if there has been an identified problem over time. In accordance with Government guidance on planning obligations, developers should pay contributions that are related to the scale of the development and are needed as a result of that development.</p>	Noted.	Preferred options will be drafted and implemented in accordance with national policy guidance.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Option TR1	Option TR1 is supported, as it reflects London Plan policies 3A.5 and 3C.1, and paragraph 3.165, for which developers are encouraged to locate major developments (with high density) where public transport accessibility (PTAL) is considered as high. Density is also linked to transport provision in the London Plan density matrix (table 4B.1). TfL has produced some detailed maps of this PTAL index to produce a consistent London wide public transport access mapping facility which should assist boroughs and developers in their planning decisions.	Noted.	Preferred options will be drafted to reflect this aim.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Option TR3	Option TR3 is supported, which is in line with London Plan policy 3C.2 and paragraph 3.212 in terms of transport assessments. All applications should address the potential transport impact of the proposals, whatever the size of the site, however the submission of details should be proportional with the size of the transport implications that the development generates. In the case of major development the applicant should therefore submit a full transport assessment.	Noted.	Preferred options will be drafted to ensure effective implementation.
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Option TR4	Option TR4 also reflects London Plan policy 3C.2. The submission of green travel plans should be actively encouraged, specifically for developments with significant transport implications. In terms of thresholds to trigger their submission, further information will be provided in TfLs guidance on transport assessments.	Noted.	A GTP will be required for certain development depending on use and location.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Option TR5	Option TR5 is strongly supported. This is reflected in London Plan policy 3C.10 but also in policies 6A.4 and 6A.5.	Noted.	No change.
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Option TR7	Option TR7 is supported as it reflects London Plan policies 3C.15 to 3C.18 related to reducing congestion and making better use of London's streets. Managing and distributing traffic in accordance with the road hierarchy should reflect the London Plan.	Noted.	Preferred options will seek to connect transport flows to traffic use in accordance with a road hierarchy.
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Option TR8	Option TR8 is also supported as it reflects policy 3A.21, and policies 3C.19 to 3C.21, related to improving conditions for walking, buses and cycling in the aim of improving the overall safety. Improvement to pedestrian routes to school is considered as being particularly important as referred to in paragraphs 4G.49, 4I.15.	Noted.	Walking will be promoted as part of the preferred options. This issue will also be supported through the Local Implementation Plan - the Borough's Transport Strategy.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Option TR10	Parking strategies and standards for the Borough need to reflect the London Plan, which seeks to ensure that on-site car parking for new developments is kept to a minimum in order to encourage sustainable modes and alternative to car uses in the aim of reducing traffic congestion.	Noted.	Preferred options will reflect London Plan standards.
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Option TR13	Option TR13 is supported, which requires specific cycle provision as part of all developments in order to encourage alternative to car usage. As stated in Annex 4 of the London Plan, developments should provide sufficient secure cycle parking and supporting facilities in accordance with PPG13 and the Transport Strategy. The design manual of the London Cycle Network provides further guidance and is used by TFL as indicative guidance. Strategic applications should comply to this guidance.	Noted.	Provision for cycles will be pursued as a preferred option.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Option TR14	Option TR14 is strongly supported and in line with the London Plan, Annex 4, paragraph 14.	Noted	No change.
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Options TR18, TR19, TR20	TfL would encourage the borough to identify sites where safeguarding of transport facilities is possible and necessary within the LDF.	Noted.	Transport facilities will be identified.
66	Christine McGoldrick	Strategic Planning Manager, Greater London Authority	Comments	At the moment, please note that the western extension of the Greenwich Waterfront Transit to Canada Water, the DLR extension from Lewisham to Catford and the Croydon Tramlink extension to Lewisham are not contained within TfL's 5 year Investment Plan. Therefore, any references to these particular schemes within the LDF should include the current status of these schemes.	Noted	Preferred options will be drafted and implemented in accordance with regional policy guidance and in conformity with the regional development plan.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
29	Tim Wild	Sydenham Citizens Advice Bureau	Option TR4	This is the most important issue.	Noted.	Requirements for a GTP will be in accordance with PPG13 - those developments having a significant impact. A small scale development may have a significant transport impact dependant on its location. Thresholds will not be adopted.
30	C V Sayers	71 Leyland Road	Comments	Extend and enhance walking routes.	Agree.	Walking will be promoted as part of the preferred options.
71	Ivan Pasalich	Environment Agency	Comments	The EA has no stance to take on this issue other than we would like to encourage more cycleways in order to reduce emissions. We would also encourage Local Authorities to look at improved public transport and renewable energy sources for public transport.	Noted.	Preferred options will be drafted and implemented in accordance with regional policy guidance and in conformity with the regional development plan.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
65	Cllr Robert Massey	London Borough of Lewisham	Option TR11	Uneasy about relaxing our car parking standards by changing our local criteria. Quality of life in the borough depends on a shift from car use to public transport	Agree.	Preferred options will be drafted and implemented in accordance with regional policy guidance and in conformity with the regional development plan.
65	Cllr Robert Massey	London Borough of Lewisham	Option TR12	I strongly support the provision of cycle parking in all new developments	Support welcomed	Preferred options will be drafted and implemented in accordance with regional policy guidance and in conformity with the regional development plan.
65	Cllr Robert Massey	London Borough of Lewisham	Option TR14	I strongly support car free development.	Support welcomed	Preferred options will be drafted and implemented in accordance with regional policy guidance and in conformity with the regional development plan.

FORM	NAME	ORGANISATION	ISSUE AND QUESTION	SUMMARY OF RESPONSE	OFFICER RESPONSE	PROPOSED CHANGE
65	Cllr Robert Massey	London Borough of Lewisham	Option TR15	I strongly oppose a minimum parking provision in new developments.	Noted.	Preferred options will be drafted and implemented in accordance with regional policy guidance and in conformity with the regional development plan.

## Next Stage

The next stage in preparing the Local Development Framework For Lewisham is the preparation and publication of Councils 'Preferred Options'. These 'Preferred Options' will be prepared taking into account the comments received as a response to the Issues and Options consultation undertaken, as summarised in this document. The 'Preferred Options' will also be public exhibited for comment for 6 weeks and this is expected to be undertaken in the Spring of 2007.

## APPENDIX 1. Summary of Planning Focus Meetings

### MEETING WITH DEPTFORD BUSINESS GROUP

23 August 2005

#### Deptford Station:

- *Redevelopment and refurbishment of the entrance taking place which will enhance the listed arches structure/ramp and provide retail outlets within the arches structures. A public space will also be created as part of this redevelopment of the ramp area. It is anticipated that they will start on site early next year.*
- *Any expression of interest in these arches should be made to Jennifer Taylor who will then be able to forward the details to the Developer who succeeds the tendering process for the development.*

#### Local Development Framework:

- *The comment was made that the ward name of Evelyn should be changed to Deptford.*
- *Currently most of the High Street is open 7 days a week with most of the businesses being family businesses and without a regular wage, i.e. most businesses are marginal in economic viability terms.*
- *While convenience shopping draws people to the High Street, there is concern that people from the new developments are not using the High Street.*
- *Concerns were raised about the number of betting shops which are going into the High Street, especially the loss of the Gallery/café to yet another betting shop. The number of 'Pound shops' was also raised as a concern, i.e. the variety of shops on offer needs to be extended.*
- *Control over the refurbishment of the arches at the station will enable some control over the types of retail outlets which will establish in the area. It is hoped that businesses such as an art supply shop and stationers may be successful.*
- *It was stated that at present there are no vacant shops on the High Street and with good competition it means that the rents have been slowly increasing. Also it was suggested that when any vacancies do arise they are then let within families. This is then 'contributing' to the fact that it is difficult to get other shops into the High Street, when the shops are let within families and therefore there is little different in the way of retail provision.*
- *It was suggested that to address this the Council should buy up premises, food shops etc and replace them with other book shops or stationers.*
- *New Cross/ Deptford /Greenwich have been identified as a creative industry hub by the London Development Agency. The area contains Goldsmiths, Trinity College of Music, the Laban centre etc.*
- *There could also be subsidized space for Art? Answer is in market? There are several creative groups within the Lewisham area. Could higher value residential development on employment land assist with this by subsidizing employment space.*
- *There must be life around the station; New people will come in and look at what people are around - this will dictate your offerings accordingly. "The big chance is the refurbishment of the arches" e.g. a need for deli, drugstore, stationers, post office, bookshop, music shop (i.e. Virgin).*
- *Some of the attendees felt that Deptford High Street will remain the same as people will stay in Convoys and stay in Seagers and not utilize the shops within the High Street. There is a need to take action to attract new residents to the shops.*
- *55 Years ago the Deptford High Street was better as it had various shops, but when the Lewisham centre was built they relocated to Lewisham and the area declined. Then flats were built in Evelyn Street and more disruptive families moved in. While things have improved in recent years, there is still a need to improve the infrastructure around Griffin Street.*

- *Art work on stalls and the station can enhance the area – maybe more like Portobello, Camden markets to make a new style of Deptford, needs something ‘extra’.*
- *There is a need to think about what attracts creative industry – too many chain stores would drive them away. ‘you don’t want to a clone town’. There needs to be a mix of shops. Currently there are no sports shops in the area.*
- *Is Deptford to compete with Lewisham or is it an entirely different offer?*
- *Creative hub – there needs to be an incubator funded by the state – a market or festival will not do it.*
- *Let people at the rail station know where the Cuckpit Arts centre is located. JT advised that there is a signage strategy which is currently being produced and will be released/ implemented in the coming weeks.*
- *There seems to be demand for creative business premises close to the High Street out of the way of things it’s not so popular.*
- *Better crossing on Deptford Broadway as well as signage at the stations would help to direct people to some of the creative shops.*
- *The suggestion was made about local artists using the station as a mural area to encourage people to attend the Cuckpit Arts Centre. This should be undertaken in the near future and not in 2 years time. The suggestion was also made that this should be considered as part of the works which will be occurring as part of the station redevelopment. This could involve a location map of where the art centre is in relation to the station.*

#### *Main Points:*

- *Concerns have been raised over the marginal viability of the shops.*
- *Concerns have been raised over the lack of variety of the shops within the centre. However, caution has been noted that any ‘mainstream diversity’ is likely to deter the creative element from settling in the area. How do we attract diversity in an independent way?*
- *Deptford has a local strength as a creative hub at the moment and there is general interest in maintaining and enhancing this whilst encouraging people to the centre.*
- *There has recently been some significant developments occurring in the area, however, there is concern as these residents are not using the district centre for their needs. This is likely to be due to a lack of variety of goods and services in the centre.*
- *Redevelopment of the train station is keen as a gateway for attracting the ‘new people’ to the centre. Deptford is still in the process of shaking off some negative image problems and needs to appear more attractive, inviting and easy to navigate. A short term suggestion was to paint etc the hoardings while the refurbishment/ redevelopment is taking place. This can inform people as to what is happening in the area as well as promoting local artists and wares. This could help to make the area more inviting and for people to be aware as to what is available in the area.*

## **MEETING WITH FOCAS – CONSERVATION & AMENITY GROUPS**

17 October 2005

- *Helen Pink requested an explanation of the issue of planning gain – Grove Park Community Group were concerned that it sort of sounded corrupt – selling permissions.*
- *Brian Regan explained that a new Planning Circular has suggested a new tax on housing and abolishes S 106 agreements.*
- *Pete Smith emphasised that planning gain needs to be NECESSARY for the development to take place, and that there will have to be TRANSPARENCY in the use of the money. Mechanisms are being set up for Planning Service acting as the Local Planning Authority as Gatekeeper to ensure that the funding is used by the rest of the Council for the purpose for which it was intended.*
- *Helen Pink commented that the facilities that should be provided as part of new housing development in the context of an 11,000 target never seem to keep up and are never provided.*
- *Brian Regan agreed to send John Fox a copy of the new Circular.*

- *Henry D'Alorto asked how the new S106 would be scrutinised – he knew that in the past they had been over ridden and ignored e.g. the traffic lights at Grove Park. He had no confidence in the system.*
- *Pete Smith said that in the future a group of officers will be looking after S106 money and they are all publicly available on the Register.*
- *Charles Batchelor commented that many of the options were not really options at all and that he had been faced with an unformulated mass of statements.*
- *Many present said that the feeling from the Issues and Options papers was that Lewisham was faced with a set of impossibilities and where would the 11,000 new build target go? What about empty Homes? (Pat Trembath).*
- *Henry D'Alorto said that according to the Government any company that employs fewer than 5 people is not significant. On these sites housing is more suitable. Lewisham is in a good position for employment on the edge of the City and close to Canary Wharf. We should therefore put hundreds of the housing units on the employment land with low levels of employment. Lewisham has as much employment land as we can sustain – therefore we should lost some of it. There also appeared to be no logic in past planning decisions which has seen some relatively high employment sites lost and some larger low employment sites defended.*
- *Bill Elson said that the south of the borough is largely suburban and people tend to commute. In Deptford many people work locally for small employers. We do not want to lose these sites.*
- *Sue Gore said that the provision of amenities is not considered not the cumulative impact in the area including health and play facilities etc.*
- *Pete Smith said that this was covered by the new circular.*
- *John Fox said that we should be protesting to the government about the new targets – what can we do about it, lobbying MPs etc. How can we get public representatives to state their views on this? – we explained about appeals and inspectors etc.*
- *Pete also added that the Council is working with the Health Authority on provision.*
- *Charles Batchelor asked whether the conservation areas would be undermined and weakened by the process.*
- *Said that Option U3 does not mention character appraisals for Conservation Areas.*
- *Henry D'Alorto said that he was surprised that a piece of Metropolitan Open Land (Allotments at Hoser Avenue) was being put forward in the Site Allocations Paper. There is a list of covenants protecting the site. Also the Council is committed to a target of providing x amount of MOL per 1000 population – building here would mean that target would be even further from being met.*
- *Brian Regan explained the consultation process and that it was the developer who has put this site forward. Consultation responses were requested now on this site and all the sites put forward in the Site Allocations document.*
- *Pete Smith requested comments on the Employment Land Paper (live/work aspects etc.)*
- *Henry D'Alorto requested an explanation of the new powers of the Council under the new Compulsory Purchase Act.*

## **MEETING WITH FAITH GROUPS**

16 November 2005

### **Ray Hall - Representing Churches together in Lewisham**

Comments on the proposed developments in Lewisham Town Centre:

- *The new development should capitalise on the character of Lewisham, which comprises three market towns in a valley surrounded by hills and be of an iconic nature currently lacking for Lewisham.*
- *The opens paces and parks on the hills used to be gathering places for entertainment because of the views. The big iconic attraction of Lewisham in the hills, viewpoints and valleys. The Thames itself is of limited interest for Lewisham.*
- *A fundamental error has been made in the Lewisham Gateway project by not recognising this character of Lewisham, as is the transport node 'low H'.*

- *The opportunity to shape a place at a crucial node of rail and water, valleys and hills is not being taken.*
- *The opportunity should be taken to create an identity 'the People's Crown' - needs to reflect all communities in Lewisham.*
- *It should be a 'gathering place' and generate a sense of place on foot in order to put the Town Centre on the global map for all the 'global people' we have here. The Christian community is worldwide - people from Africa etc trading and employing. The rest of the world should get to know Lewisham as a centre for the global nature of the relationship with the spiritual.*
- *The roundabout could be an asset, and create a bigger sense of place as a point between the transport nodes.*
- *The current scheme is too politically driven and controlled, with an underlying policy of creating high density housing which is not able to generate employment - Lewisham takes the attitude that we export people from the borough to work elsewhere, with a residential character to the borough rather than to create a local economy.*
- *There is insufficient business representation on the Lewisham Strategic Partnership.*
- *The Council is also losing money by this development. The Council's land asset the old Odeon Cinema and Runnel Street will be wasted. These sites have a relatively high land value which is being thrown into the 'low h' which is funding infrastructure only. The site could be developed in an iconic way to become a genuine community asset and put Lewisham Town Centre on the map.*
- *No money has ever been spent on the market - it needs to be enhanced for the people and the businesses involved. We could re-position the community on the world stage.*
- *The project will involve a lot of disruption on top of the seven years traders went through (some to bankruptcy or near bankruptcy) as part of the Lewisham 2000 project.*

#### **Judith Seymour – Crofton Park Baptist Church**

- *One of the first points which was raised was a concern for speaking up for the silent majority, which sometimes may not be heard over the vocal minority. The Crofton Park Baptist Church has seen itself as having a voice for the voiceless.*
- *Specific issues relating to their church site (Crofton Park Baptist Church). This includes desperately needed road repair works to Huxbear Street (an unadopted road). There is also a need to better pedestrian facilities along Brockley Grove across Huxbear Street entrance as large puddles accumulate during wet weather forcing pedestrians to walk into the oncoming traffic of Brockley Grove.*
- *While there has been instances of crime, particularly graffiti and anti-social behaviour around the back of the church and it's buildings they have attempted to include the youth in their activities and tried to get to understand them.*
- *When asked what she thought that the Council could do to improve things, the comment was made that they support the recycling and other environmental initiatives within the Borough, however, concerns were raised that even as a Church they are charged for rubbish collection and having to pay commercial rates. Notes were also made that a blue bin has been taken from the Brockley Grove bus shelter near the church.*
- *There were several other general points which were made around the protection of public open space and enabling flexibility for shop uses in areas where the shops have been vacant for some time.*

#### **Graham Trice – College Park Baptist Church**

Church site:

- *Subject Church site requires no further expansion.*
- *Small Church car park included in the site (approx 7 car parks). Currently is being abused by local shoppers.*
- *Poor security for the car park - Would welcome CCTV security.*
- *Council car park adjacent. Would resist change of use for this car park.*
- *CPZ operates in the street.*
- *Any growth in church members can be accommodated within the site*

*General:*

- *Need additional community space - e.g. rooms available for hire by faith groups.*
- *Recognised that faith groups only utilise community resources (i.e. centres) for a small period of time. Sharing of centres with other groups (i.e. elderly) would be more efficient use of resources.*
- *Recognised that existing transport networks, especially buses are important to faith groups.*
- *Churches are affected by parking restrictions, especially on Sundays and for mid-week funerals. Suggested that CPZ exemption be granted for funerals, with notice to Council.*

## **MEETING WITH LEWISHAM DISABILITY COALITION**

12 December 2006

*Dropped Kerbs*

- *Following works in Lewisham High Street the dropped kerbs outside the Lewisham Library have been moved. A cycle path and a bus lane has been constructed, and now the only crossing points for buggies and wheelchairs is at MacDonald's.*
- *Transport for London have not responded to requests for changes to this.*

*Car Parking:*

- *Questioned whether proposed standards for car parking spaces for residential development would be sufficient for wheelchair users – included requirements for getting out at the side of cars and potentially from the rear for some car designs.*
- *Pointed out the car parking bays on Molesworth Street do not meet the requirements of wheelchair users as they are not very large and you have to open doors into traffic.*
- *Public pathways are very often not suitable for the wheelchair user – so it is not possible to get to the new bendy buses (or any other buses for that matter).*
- *Advised that they could comment that streetscape and parking is not included in the Local Development Framework and a Supplementary Planning Document could be done (perhaps to update or complement the Lewisham Streetscape guide done by highways?)*
- *Advised that disabled people are not allowed to park in Controlled Parking Zones. –s this true, is some explanation required.*

*Paving:*

- *Tactile paving was universally disliked by all people with mobility difficulties. – dangerous if you are dodgy on your feet, mother of babies curse it, the elderly, whose balance is not too good cant pick their heels up properly.*
- *Advised that ribbed paving rather than knobbly paving would be better.*
- *Agreed that all homes should be to lifetime standard but with a threshold for requiring a percentage of wheelchair housing.*
- *Reported that placing documents on the council website is inadequate for ordinary computer users (presumably non broad band). The documents simply often do not respond and refuse to be opened.*
- *Stated however that wheelchair housing should not be provided in ghetto developments – this has the effect of singling people out and making them vulnerable to harassment.*

*Shop fronts:*

- *Advised that a Supplementary Planning Document on this is under preparation that may not have particularly taken on board – such as doors that are too heavy and which open outwards and also sloping ramps that are too difficult to negotiate in combination with an awkward door*
- *Planning officers undertook to refer this problem to the planning officers who were preparing the guidance.*

## MEETING WITH MAYOR'S COMMISSION DEVELOPING A SUSTAINABLE ENVIRONMENT

27<sup>TH</sup> November 2006

- Malcolm Smith outlined the background to the LDF. The requirement to bring this framework into force has been introduced by the government and will replace the Unitary Development Plan (UDP) as the overarching planning strategy for local authorities.
- MS informed that commission that the intention from government was to offer more flexibility within the planning and development process. The reality of this intention would be seen in the future.
- MS then moved on to his presentation and highlighted the different elements comprising the LDF. MS informed the commission that of key importance is the spatial (core) strategy.
- This document will set out the key elements of the planning framework and will comprise a vision and objectives for the area along with a spatial strategy, core policies and a monitoring and implementation framework. It will also include broad development control criteria against which all planning applications will be judged.
- MS then outlined some of the key issues that the draft spatial strategy needed to address:
  - Population is predicted to grow by about 25,000 between 2001-2016
  - New homes to increase by 10,000 between 2006-16
  - Parts of the borough have a poor environment. Fear of crime issues are a major concern for residents
  - But there are also 25 conservation areas and 560 ha of open space together with well established residential areas
  - There is a shortage of business accommodation and low level of investment in employment sites.
- MS reported that the proposed approach identifies a major growth corridor for Catford, Lewisham, Deptford and New Cross.
- MS then outlined the draft policies for sustainable environment and waste. These policies concern:
  - sustainable construction and renewable energy
  - stand alone and roof mounted renewable energy
  - river water quality and water resources
  - flood risk and sustainable urban drainage systems (SUDS)
  - the requirement for an air quality assessment
  - development on contaminated land
  - noise and vibration and light attenuation
  - construction waste and aggregates and construction materials
  - provision of new waste management sites and protection of existing waste management sites
  - residential waste management facilities
  - commercial/large scale development waste management facilities
  - living roofs for biodiversity
- MS then talked about the intended plans for Lewisham Town Centre and Catford Town Centre; outlined the North Lewisham Masterplan and discussed the sustainability aspects of the proposed Convoys Wharf development. MS then concluded the presentation with a look at examples of place making in town centres and around transport nodes.
- MS noted that many of the development sites and intentions fall under the remit of the private sector. However MS reminded the commission of the major infrastructure projects that take their lead from the council, specifically Building Schools for the Future (BSF) and the Decent Homes Standard (DHS). MS noted that there was major role here for the council to expect sustainable standards to be employed in both these schemes.

- The Chair thanked MS for the presentation and asked the commission for any comments or questions.
- SW began the discussions by describing an excellent example of local place making and how it had been achieved. The changes to Forest Hill had started a number of years ago on a small scale through discussions between local residents and councillors. With major stakeholders such as Sainsbury's investing in a new store, real change has taken place in the local area. The real catalyst, SW suggested, had been partnership working at the local level.
- Addressing the issue of place making around transport nodes, SW also pointed out that the extension of the East London Line should be an excellent opportunity for the local area. SW pointed out that she felt that transport and travel are key factors both in relation to place shaping, as well as in terms of sustainability in a general sense.
- MS agreed that a key role for any local authority in these areas was around influence and advocacy. MS reiterated the fact that the LDF will not be a solution to place making or increased development. Moreover it would be an added tool in the influence local authorities could exert.
- RS then asked about how much scope, generally and in respect of the LDF, there was for the council to:
  - promote a zero-carbon development
  - develop the local green economy
  - use Brownfield sites to increase bio-diversity
- MS responded that in terms of developing the local green economy, Convoys Wharf would offer an exciting opportunity in this regard, given the sustainable business park proposals.
- In respect of Brownfield sites, MS noted that the bio-diversity potential of Brownfield land often depends upon the length of time that land has been vacant. Where a major bio-diversity interest could be argued, Section 106 negotiations with developers ought to allow for some form of accommodation/protection.
- MS noted that the specification role of the Section 106 also provided the authority with the means to express a preference for locally sourced labourers. MS noted that EU law restricts strict local workforce recruitment but that the Section 106 could determine the tone and expectations of a development.
- BR explained that the Convoy's Wharf development is already committed to be an example of sustainable development and will, for example, incorporate a new recycling centre.
- RH pointed out that in relation to zero-carbon developments, these would only occur if land was to be sold at lower rates.
- Continuing the theme, HA asked if LBL could sell unoccupied land at a lower rate on the proviso that developers ensured the development was carbon neutral.
- Steve Gough, Director of Programme Management and Property, said that this was possible in theory, however there were significant issues around the issue of subsidy. SG reiterated that the council's primary role was as an influencer.
- MS suggested that the fact that zero energy developments were not more prevalent implied that either they didn't work, or that they hadn't been tried enough.
- HA said that a reason there wasn't more on-site renewable energy generation could be due to fact that developers felt the infrastructural costs would be too expensive. However if an incentive were to be given to developers, could such a development be more feasible?
- RB said it was important to get to grips with what we really mean when we talk of zero energy developments. If we mean requiring developments to install onsite generation from renewable sources, then this is potentially a very expensive consideration for developers and may therefore be a disincentive. If what we mean is 'low carbon living' in the round (i.e. behavioural change), then this is potentially easier to achieve. RB used the example of 'green travel' as an example of low carbon living – a zero energy / carbon development might be one which is 'car free'; thus encouraging walking to school for example.

- RS reiterated this point and used the example of Bed ZED to illustrate how lifestyle changes (in travel, eating, leisure for example) can have a marked impact in relation to carbon reduction.
- MS said that these were interesting points of discussion. In the context of discussions around development however, they again highlighted issues (behavioural change for example) that the LDF can't influence.
- TL pointed out that a non-traditional approach could see the authority offering sites for competition. This would perhaps obviate some of the more obvious difficulties of disincentivising developers through too onerous requirements. These issues were still being deliberated and discussed within the traditional local authority.
- BE made the distinction between private and council land. BE again highlighted the council's role as an influencer in these debates and used the example of Camden in this regard; the borough has relatively large amounts of car-free areas because 90% of the borough comes under Controlled Parking Zones (CPZs). BE further noted that the issues of transport and travel, in a general sense, were key issues in relation in the development of a sustainable environment.
- Going back to earlier discussions about employment, BE suggested that there is role for everyone to play in challenging perceived orthodoxies – one of these is 'commuting is the normal thing to do'.
- Finally and in relation to local development, BE suggested that a key sustainable action for local authorities should be to maximise use of space. In this regard, BE said that there was a high level of unused space above shops in Catford.
- SW pointed out the council had recently been doing a lot of work developing space above shops across the borough – a good example was Honor Oak.
- Returning to the issue of zero energy development, RB suggested that there needed to be a holistic approach in addressing this issue. There needed to be clarity on what role the London Borough of Lewisham could play in generating low carbon construction and low carbon living.
- BE stated that planning control did have a part to play, but RB suggested it wasn't simply a single area where influence could be exerted. Moreover, the issue is how this commission can work with LBL to establish a course of action – what can we and cant we do.
- MS agreed with this notion and used the example of Lordship Lane in East Dulwich as an example of a local authority using their influence. Despite local objections, the London Borough of Southwark agreed to the planning application submitted by Sainsbury's for a large development near Lordship Lane. LBS took a decision because they thought Lordship Lane would benefit economically – this decision had been proved correct. An added issue here was that this hadn't been achieved through subsidy. MS stated that It is the market, not a local authority, that creates jobs.
- SW agreed that the changes in Lordship Lane had been noticeable. However they had taken 15 years to come to fruition, and a shift in demography should also be taken into account when analysing the turnaround of the area.
- **ACTION: Commission to further investigate the issue of zero carbon development - to include an identification of LBL-owned sites which might be relevant to this debate – while noting that the LDF, as a planning framework, is limited in the influence it has in respect of 'behavioural' change – a key point in the discussions in relation zero energy / carbon development.**
- **Officers to bring back to a future Commission meeting an analysis of the scope of the role of the LBL in generating low carbon construction and low carbon living.**
- The Chair then moved the discussion on to the issue of housing and suggested that the LDF should be a framework which at least makes reference to the fact that, in relation to affordable housing, one or two bedroom units are not always the answer to housing need. Sustainability, if taken in the round, needs to include how the issue of housing is tackled. While it is important to be judged on the percentage of renewables used in major developments, it is equally important to ensure that we discuss issues of housing.
- BR, informed the commission that the LDF will require private developers to ensure that all developments over 10 units have 35% affordable housing included in the plans. BR indicated that the policy used to be for developments over 15 units. BR further pointed

out that the Mayor of London wanted the percentage of affordable housing in new developments to be 50% - however, the general consensus is that this is not achievable at present in Lewisham.

- In relation to the issue of unit size, BR stated that 92% of new builds are likely to be one and two bedroom units. However, this is in line with predicted increases in the population of one parents households and is therefore not altogether surprising.
- **ACTION:** In relation to the LDF, the Commission agreed to monitor the progression of the LDF process, both in a micro sense (e.g. renewable energy targets) and on the macro level (e.g. housing need).