



## Comment

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<b>Event Name</b>	Lewisham Site Allocations DPD - Proposed Submission Version
<b>Comment by</b>	Andrew Wood
<b>Comment ID</b>	2
<b>Response Date</b>	17/04/12 22:59
<b>Consultation Point</b>	Map 2.39 Site off Tyson Road & Honor Oak Road/Rear of Christian Fellowship Centre, Forest Hill ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### 1. Legal Compliance

**Do you consider the Site Allocations Proposed Submission Document is legally compliant?** No

### 2. Soundness

If you enter NO in response to this question, please also answer Question 3. Otherwise go to Question 4 to give reasons why you consider the document is not legally compliant or to Question 8 if you just wish to comment on an aspect of the document. Notes explaining 'soundness' are to be found in the supporting documents of the introductory consultation page .

**Do you consider the Site Allocations Document is Sound?** No

### 3. Reasons for Unsoundness

**Please select below, the reason why you consider the Site Allocations Document is unsound.** The document is not consistent with national policy

### 4. Details of legal non-compliance or unsoundness

**Please give details below as to why you consider the document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the document please also use this box to give your reasons.**

The five key objectives of Lewisham's Site Allocations DPD are stated to be as follows: ?To facilitate development by allocating sites to meet the Core Strategy's strategic objectives and priorities and implement its spatial strategies ?To facilitate development which protects and enhances the amenity of the local area, identifying key environmental, historic and cultural features ?To ensure a high standard of design from new developments ?To create safe and attractive environments ?To secure development that helps create a more sustainable Lewisham I assume that these objectives reflect national policy. The proposed site allocation is inconsistent with the second and fifth objectives. Despite its description as brownfield approx. 80% of the site is garden land and under current planning guidance should not be classed as brownfield. The site has significant local environmental value (which was acknowledged when planning permission was granted) and development of a large area of green open space such as this will not enhance the amenity of the local area. Development of this site for housing is not sustainable and therefore inconsistent with the Government's recently issued National Planning Policy Framework. For a site allocations policy for housing to be sustainable in the context of biodiversity and environmental sensitivity it should focus proposed residential development on sites which are currently classed as brownfield and which would benefit from redevelopment and regeneration. The majority of the site is not classed as brownfield under current planning rules. The current planning permission for the site was granted before the changes to national planning policy relating to garden land and garden grabbing and prior to the new National Planning Policy Framework. The site allocation assumes that the existing planning permission would be granted under current planning law which is not necessarily the case. When planning permission was granted for this site the issue of its importance to local biodiversity was a key factor. It was acknowledged at that time that the biodiversity value of the site was likely to increase over time if the site was left undisturbed. This has been the case and the site has not been actively managed since planning permission was granted. The current planning permission lapses in early 2014 and if development does not commence before that time it cannot be assumed that planning permission for a similar residential development would be forthcoming under current planning rules. The Council should be required to reconsider the proposed site allocation in the light of current planning law and not the planning law that applied when the Council first proposed the allocation of this site for housing back in 2005. In other words the excessively long period of time between the Council proposing this site for residential development and the production of the final draft of the site allocations document has rendered the proposed site allocation unsound.

## **5. Changes required to achieve legal compliance/soundness**

**Please set out below the change(s) you consider necessary to achieve legal compliance or soundness. YOU WILL NEED TO SAY WHY YOU CONSIDER THIS CHANGE WILL ACHIEVE LEGAL COMPLIANCE OR SOUNDNESS. It will be helpful to add your suggested revised wording of any text.**

The Council should be required to reassess this site in the context of current planning rules and in doing so it should be required to take a more sophisticated and thorough approach to the analysis of this site and its various constituent parts. No use for this site should be proposed until such an exercise has been completed. If residential development is to be proposed for this site a sustainable approach (as required by the National Planning Policy Framework) would be to limit such development to the brownfield element of the site which is represented by 15 to 17A Tyson Road, the property known as the Cottage and the old lock up garages. This represents approximately 20% of the total area of the site. The majority of the site, which under current planning rules is not categorized as brownfield, should be designated as a site of local nature conservation importance reflected its documented importance in supporting local biodiversity.

## **6. Participation in the Oral Examination**

**If your representation is seeking a change do you consider it necessary to participate in the oral part of the examination?** No