

Public Examination of the Site Allocations Local Plan

London Borough of Lewisham response on the Inspector's Question 5: Major Modifications

(Note the full text of the Inspector's questions are on the Examination website and can be accessed via the following link:

<http://www.lewisham.gov.uk/myservices/planning/policy/Documents/SA%20Inspector%27s%20queries.pdf>)

Planning Policy – 16th November 2012

Council Response

1. Introduction

- 1.1 This paper responds to the Inspector's initial question 5 in relation to the Site Allocations Local Plan (SALP). Reference to documents SALP1.7, 1.8 and 1.8a refer to the Examination Library reference system.
- 1.2 The Council acknowledges that 'main modifications' should only address matters of unsoundness or legal compliance as specified in S20(7C) of the Planning & Compulsory Purchase Act 2004 as amended. The Council also acknowledges that the submitted version of the 'Schedule of recommended main modifications' (Examination Library reference SALP1.8) contained recommended modifications that did not relate to soundness and therefore should have been included in the 'Schedule of recommended additional modifications' (Examination Library reference SALP1.8a).
- 1.3 To clarify this issue, the Council has reviewed its approach to recommending modifications as either 'main' or 'additional' modifications. The latter 'additional modifications' refers to modifications that the Council consider, taken together, do not materially affect the policies set out in the SALP, as specified in the 2004 Act (as amended).
- 1.4 The Council has reviewed and suggested changes to the following documents:
 - SALP1.7 Schedule of officer comments to representations to Proposed Submission Report
 - SALP1.8 Schedule of recommended main modifications
 - SALP1.8a Schedule of recommended additional modifications

2. Schedule of recommended 'main modifications' to the SALP (Examination Library reference SALP1.8)

2.1 Having reviewed SALP1.8 the Council considers that there is only one 'main modification', which is considered by the Council to be required as a matter of plan soundness and or legal compliance. This is as follows:

- MM1 – The addition of text relating to the presumption in favour of sustainable development in order to be consistent with the NPPF.

3. Schedule of recommended 'additional modifications' to the SALP (Examination Library reference LTCLP 1.8a)

3.1 Having reviewed SALP1.8 the Council now consider that an extra 59 'additional modifications' be added to SALP1.8a, as the Council considers that they do not raise issues of soundness or of legal compliance.

4. Proposed changes to LTCLP 1.7, 1.8 and 1.8a

4.1 As a consequence of the above review the Council now propose a revised 'schedule of main modifications' which is set out as appendix 1 to this response and a revised 'schedule of additional modifications' which is set out as appendix 2 to this response.

4.2 The Council has made amendments to the 'Reason for change' column in both of the proposed replacement schedules in order to ensure that there are clear reasons why each modification is included.

4.3 In order to consistently reflect the amendments listed above the Council has produced an amended version of the 'Schedule of officer comments to representations to Proposed Submission Report', Examination Library reference SALP1.7. This revised document is set out as appendix 3 to this response. In addition to the amendments discussed above, the Council has also clarified in appendix 3 when a representation states that a comment is a matter of soundness and when the Council now believe a comment is a matter of soundness.

5. Conclusion

5.1 The Council has reviewed the 'schedule of main modifications', SALP1.8 and the 'schedule of additional modifications', SALP1.8a, in response to the Inspector's initial question. The Council considers that to comply with the PCPA 2004 (as amended) it is necessary to make changes to these documents and consequential changes to SALP1.7. The Council's suggested changes are set out in the three appendices to this response.

5.2 The Council has not yet added the proposed replacement versions of SALP1.7, 1.8 and 1.8a to the 'Examination Library', but will do so if the Inspector considers it appropriate.



Schedule of recommended **main modifications** to

Site Allocations Local Plan

(Proposed replacement version following the Inspector's Question number 5)

November 16 2012

Recommended main modifications

Table 1 details the main modification that the Council is recommending to be made to the Proposed Submission version of the Site Allocations Local Plan. The Council consider that the modification is required in order to be consistent with the National Planning Policy Framework (published in March 2012), and therefore make the SALP sound. A ‘track changes’ version of the Submission Site Allocations Local Plan has been produced to ensure the recommended changes can be easily viewed in the plan context (see SALP1.19).

The recommended modifications have been assessed by the Council and are not considered to change the intent of any policy significantly. Therefore, there has been no reason to make any changes to the existing versions of supporting documents, including the Appropriate Assessment (SALP1.3), the Equalities Analysis Assessment (SALP1.5) or the Proposals Map Changes Document (SALP1.6). This means the Proposed Submission versions of these documents have been used to support both the Submission Version (SALP1.1) of the Site Allocations Local Plan and the ‘Track Modifications’ Version (SALP1.19) containing the Council’s recommended modifications.

Table 1: Recommended main modifications

Ref	Page (in tracked changes version)	Paragraph/ policy/ section/ figure (in tracked changes version)	Amendment/proposed change <i>(deleted text is in struck-through; new text is in bold and underline)</i>	Reason for change	Suggested by/Representati on ID
MM1	3	Paragraph 1.11 and new text box below	<p><u>The NPPF also states that Local Plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally (NPPF paragraphs 14 and 15).</u></p> <p><i>Insert text box below paragraph 1.11 containing the following</i></p>	<p>Included in order to be consistent with national policy, and therefore in order to be ‘sound’.</p> <p>To reflect the publication of the NPPF and the change in terminology and the advice of the Planning Inspectorate regarding model wording.</p>	LBL

Schedule of recommended **main modifications** to the Site Allocations Local Plan (Proposed Submission version)

Ref	Page (in tracked changes version)	Paragraph/ policy/ section/ figure (in tracked changes version)	Amendment/proposed change (deleted text is in struck through ; new text is in bold and underline)	Reason for change	Suggested by/Representative on ID
			<p><i>text:</i></p> <p><u>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions which mean that proposals secure development that improves the economic, social and environmental conditions in the borough.</u></p> <p><u>Planning applications that accord with the policies in the Lewisham Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</u></p> <p><u>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</u></p>		

Schedule of recommended **main modifications** to the Site Allocations Local Plan (Proposed Submission version)

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			<ul style="list-style-type: none"> • <u>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</u> • <u>Specific policies in that Framework indicate that development should be restricted.</u> 		



Schedule of recommended **additional modifications** to
Site Allocations Local Plan

(Proposed replacement version following the Inspector's Question number 5)

November 16 2012

Document wide recommended additional modifications

The National Planning Policy Framework (NPPF) was published in March 2012, establishing new national policy guidance and making a number of minor changes to the nomenclature associated with planning at a local level. In order to reflect the latest nomenclature it is recommended to complete the modifications detailed in Table 1. These changes will be required multiple times in the document, but to reduce confusion they have not been listed individually.

Table 1: Document wide recommended additional modifications

Nomenclature used in the proposed submission Site Allocations Development Plan Document (March 2012)	Nomenclature recommended for the adoption Site Allocations Local Plan
Site Allocations Development Plan Document	Site Allocations Local Plan
SA DPD	SALP
Development Plan Document	Local Plan
DPD	Local Plan

Specific recommended additional modifications

Table 2: Specific recommended additional modifications

Ref	Page (in tracked changes version)	Paragraph/ policy/ section/ figure (in tracked changes version)	Amendment/proposed change (deleted text is in struck through; new text is in bold and underline)	Reason for change	Suggested by
AM1	2	Paragraph 1.2	The Government requires all local planning authorities to produce a set of documents collectively known as the Local Development Framework (LDF) planning guidance , which sets out the planning strategy and policies for an area. <u>In Lewisham, this is collectively known as the Local Development Framework (LDF).</u> The Lewisham Core Strategy, adopted in June 2011, is the main LDF document. The LDF will eventually replace the remaining saved policies in Lewisham Unitary Development Plan (UDP).	To reflect the publication of the NPPF.	LBL
AM2	2	Paragraph 1.6	All sites will be shown on a Proposals Policies Map.	To reflect the publication of the NPPF.	LBL
AM3	3	Paragraph 1.10	The role and format of this Site Allocations DPD accord with Government guidance as set out in Planning Policy Statement 12 (PPS12), other relevant planning policy statements, planning policy guidance and regulations.	To reflect the publication of the NPPF.	LBL
AM4	3	Paragraph 1.10	<u>The government produces national planning policy which sets out a general framework for planning at the local level.</u> This <u>Site Allocations</u> document is also in accordance	To reflect the publication of the NPPF.	LBL

Ref	Page (in tracked changes version)	Paragraph/ policy/ section/ figure (in tracked changes version)	Amendment/proposed change (deleted text is in struck through; new text is in bold and underline)	Reason for change	Suggested by
			with the draft National Planning Policy Framework (NPPF) which directs local authorities to have up-to-date local plans in place as soon as practical. The NPPF further directs and for those plans to set out the opportunities for development and to 'allocated sites to promote development and flexible use of land, bringing forward new land where necessary, and provide providing detail on form, scale, access and quantum of development where appropriate'.		
AM5	3	Paragraph 1.10 Footnote 7	PPS12: Local Spatial Planning, GLG, 2008 NPPF paragraph 157	To reflect the publication of the NPPF.	LBL
AM6	4	Paragraph 1.14	The LDF is required to implement implements certain aspects of the vision for Lewisham's Sustainable Community Strategy 2008-2020, titled 'Shaping the Future'.	To reflect the publication of the NPPF.	LBL
AM7	4	Paragraph 1.15	As part of the work in producing the LDF, including the Site Allocations DPD Local Plan , the Council is required to produce a Strategic Housing Land Availability Assessment (SHLAA), as set out in Planning Policy Statement 3 Housing (PPS3) paragraph 149 of the NPPF.	To reflect the publication of the NPPF.	LBL
AM8	5	Paragraph 1.17	In some instances, in order to positively contribute to place-making, it may be appropriate to exceed the densities in the	This is considered unnecessarily complicated. Indicative capacities are	LBL

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			London Plan density matrix. For example, on major development sites with appropriate infrastructure support.	identified in each site allocation and individual planning applications will be assessed on their merits.	
AM9	5	Paragraph 1.18	The Site Allocations DPD DPD <u>Local Plan</u> has been the subject of consultation with key government departments... the requirements of PPS12 and the relevant regulations as referred to earlier in this section <u>government guidance</u> . The views and information representations <u>representations</u> from this process have helped to shape this Site Allocations DPD <u>Local Plan</u> .	To reflect the publication of the NPPF.	LBL
AM10	5	Footnote 17	<i>Move web link to a new footnote:</i> <u>This assessment can be viewed at:http://www.lewisham.gov.uk/myservices/planning/policy/LDF/site-allocations/Pages/default.aspx</u>	For clarification and consistency.	LBL
AM11	5	Footnote 18	<i>Move web link to a new footnote:</i> <u>The SA can be viewed at:http://www.lewisham.gov.uk/myservices/planning/policy/LDF/site-allocations/Pages/default.aspx</u>	For clarification and consistency.	LBL
AM12	6	Paragraph 1.22	To accord with PPS25 <u>NPPF paragraphs 102 - 104</u>	To reflect the publication of the NPPF.	LBL
AM13	6	Paragraph 1.28	Developers <u>Applicants</u> will be required to demonstrate...In some circumstances it may be necessary for developers	Clarification	LBL

Ref	Page (in tracked changes version)	Paragraph/ policy/ section/ figure (in tracked changes version)	Amendment/proposed change (deleted text is in struck through; new text is in bold and underline)	Reason for change	Suggested by
			<u>applicants</u> to fund studies...		
AM14	6	Paragraph 1.28	In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure. <u>Drainage on the site should maintain the separation of foul water and surface flows.</u>	In response to Thames Water concerns.	Thames Water SREP5.1
AM15	6	Paragraph 1.29	<u>Future transport projects such as potential extensions to the Bakerloo Lone and Docklands Light Railway may impact on allocated sites, depending on the routes chosen. These two future projects are identified in the London Plan as unfunded schemes anticipated for completion post 2020.</u>	In response to TfL concerns.	Transport for London (Planning) SREP10.2
AM16	7	Paragraph 1.32	Developers <u>Applicants</u> will be required to show how proposed developments preserve and enhance relevant heritage assets...	Clarification	LBL
AM17	11	Paragraph 2.7 Footnote 31	This is in line with Planning Policy Statement 3 (PPS3), CLG, November 2006 <u>NPPF paragraph 47, CLG, March 2012.</u>	To reflect the publication of the NPPF.	LBL
AM18	11	Paragraph 2.8	<u>Sites identified within the Site Allocations Local Plan are expected to deliver between 3,670 and 3,710 additional</u>	Clarification	LBL

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			<p><u> dwellings by 2026. This provision is broken down into four spatial areas, as follows:</u></p> <ul style="list-style-type: none"> • <u> 2,440 additional dwellings in the Regeneration and Growth Area</u> • <u> 340-380 additional dwellings in the District Hubs</u> • <u> 510 additional dwellings in the Local Hubs</u> • <u> 380 additional dwellings in the Areas of Stability and Managed Change</u> 		
AM19	14	Site Ref SA1	Former New Cross Hospital Site Avonley Road, New Cross Gate, SE14 5ER	Correction	LBL
AM20	14	Site Ref SA5	Site between New Cross Station, 267 New Cross Road & 47-27 <u>23-27 and 29</u> Goodwood Road, SE14	Correction	LBL
AM21	14	Site Ref SA7	NDC Centre <u>New Cross Gate Trust Site</u> , Kender Estate, New Cross Gate, SE14	Correction	LBL
AM22	15	Site Ref SA26	Site at 1-6 Coulgate Street, Brockley Cross, SE4	Correction	LBL
AM23	15	Site Ref SA28	5 St. Norberts Road, Brockley Cross, SE4	Correction	LBL
AM24	18	Table 2.1	Former New Cross Hospital Site, Avonley Road, New Cross Gate, SE14	Correction	LBL
AM25	18	Table 2.2	Site between New Cross Station & 267 New Cross Road &	Correction	LBL

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		SA5	17-29 <u>23-27 and 29</u> Goodwood Road, SE14		
AM26	18	Table 2.2 SA7	Former NDC Site <u>New Cross Gate Trust Site</u> , Kender Estate, New Cross Gate, SE14	Correction	LBL
AM27	20	Site Ref SA1 Site characteristics Implementing body	Private/RSL <u>Registered Provider</u>	Correction	LBL
AM28	20	Site Ref SA1 Site characteristics Planning status	<u>Currently being implemented.</u>	Update to reflect current planning status.	LBL
AM29	20	Site Ref: SA1 Other comments	Thames Water do not currently envisage infrastructure concerns regarding water supply capability but have concerns about waste water services/sewerage network capacity to this site. <u>Thames Water have concerns regarding water supply capability but do not have concerns about waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.2
AM30	24	Site Ref: SA2	Thames Water have concerns regarding both water supply	Does not relate to soundness	Thames Water

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		Other comments	and waste water services/sewerage infrastructure to this site. <u>Thames Water have concerns regarding water supply but have no current concerns regarding waste water capability to this site.</u>	In response to Thames Water concerns about water/waste water capacity on the site.	SREP5.3
AM31	26	Site Ref SA3 Site characteristics Planning status	Planning permission granted Dec 2008 (Ref: DC/08/69668) for northern part of site only <u>the portion of the site north of Giffin Street.</u> These works are now complete.	Clarification	LBL
AM32	27	Site Ref: SA3 Other comments	Thames Water have concerns regarding both the water supply and waste water/sewerage network capabilities to this site.	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.4
AM33	29	Site Ref SA4 Site Characteristics Planning Status	<u>Planning permission granted, March 2012, for mixed use on the remainder of the site (Ref: DC/11/78175).</u>	Update to reflect new planning permission.	LBL
AM34	29	Site Ref SA4 Site Characteristics	115 <u>132</u>	Correction	LBL

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		Planning Status			
AM35	30	Site Ref: SA4 Other comments	Thames Water do not currently envisage concerns over water supply or waste water/sewerage network capabilities to this site. <u>Thames Water have concerns regarding water supply capability but do not have concerns about waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.5
AM36	32	Site Ref: SA5 Other comments	<u>Proposals should take into account noise and other impacts from the railway and proposals should comply with London Overground's infrastructure protection requirements.</u>	Does not relate to soundness In response to Transport for London's concerns sites adjoining railway lines.	Transport for London SREP10.3
AM37	32	Site Ref: SA5 Other comments	Thames Water have concerns regarding both the water supply and waste water services/sewerage capacity to this site. <u>Thames Water have concerns regarding water supply but have no current concerns regarding waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.6
AM38	35	Site Ref: SA6 Other	particularly routes for pedestrians and cyclists across the site and near the station; <u>to improve bus stops/stands at the site;</u> and to provide appropriate scale and massing in relation	Does not relate to soundness In response to TfL comments regarding improved bus stop/stands.	Transport for London SREP10.14

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		comments	to the surrounding area.		
AM39	35	Site Ref: SA6 Other comments	Applicants should involve Transport for London in the design of any new station entrance and changes to bus stops to ensure it meets operational requirements. <u>Applicants should involve Transport for London in the design of any new station entrance and changes to bus stops to ensure it meets operational requirements.</u>	Does not relate to soundness In response to TfL comments regarding their involvement in applications.	Transport for London SREP10.14
AM40	35	Site Ref: SA6 Other comments	Proposals should take into account noise and other impacts from the railway and proposals should comply with London Overground's infrastructure protection requirements. <u>Proposals should take into account noise and other impacts from the railway and proposals should comply with London Overground's infrastructure protection requirements.</u>	Does not relate to soundness In response to Transport for London's concerns sites adjoining railway lines.	Transport for London SREP10.4
AM41	36	Site Ref: SA6 Other comments	Thames Water have no concerns regarding water supply infrastructure capability but have concerns regarding waste water/sewerage network capability. <u>Thames Water have concerns regarding water supply capability but do not have concerns about waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.7
AM42	38	Site Ref: SA7 Other comments	Thames Water have concerns regarding both water supply and waste water/sewerage network capability to this site. <u>Thames Water have concerns regarding water supply but have no current concerns regarding waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.8
AM43	41	Site Ref:	Thames Water have concerns regarding both water supply	Does not relate to soundness	Thames Water

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		SA8(a) Other comments	capacity and waste water services/sewerage network capacity. <u>Thames Water have concerns regarding water supply but have no current concerns regarding waste water capability to this site.</u>	In response to Thames Water concerns about water/waste water capacity on the site.	SREP5.9
AM44	42	Site Ref SA8(a) Strategic Flood Risk Assessment/Sequential Test	'...PPS-25 <u>NPPF paragraph 102</u> Exception Test would need to be satisfied (Sequential Test Report Ref: DCE12).'	To reflect the publication of the NPPF.	LBL
AM45	44	Site Ref: SA8(b) Other comments	<u>Proposals should take into account noise and other impacts from the railway and proposals should comply with London Overground's infrastructure protection requirements.</u>	Does not relate to soundness In response to Transport for London's concerns sites adjoining railway lines.	Transport for London SREP10.5
AM46	45	Site Ref: SA8(b) Other comments	Thames Water have concerns regarding both water supply capacity and waste water services/sewerage network capacity. <u>Thames Water have concerns regarding water supply but have no current concerns regarding waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.10

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AM47	45	Site Ref SA8(b) Strategic Flood Risk Assessment/Sequential Test	'... PPS 25 NPPF paragraph 102 Exception Test would need to be satisfied (Sequential Test Report Ref: DCE12).'	To reflect the publication of the NPPF.	LBL
AM48	47	Site Ref SA9 Site characteristics Planning status	Outstanding Planning Application DC/10/75331 granted March 2012 (resolution to grant December 2010)	Update to reflect current planning status.	LBL
AM49	48	Site Ref: SA9 Other comments	Thames Water have no current concerns regarding water supply but have concerns regarding waste water/sewerage network capability to this site. Thames Water have concerns regarding both water supply and waste water capability to this site.	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.11
AM50	51	Site Ref: SA10 Other comments	The site was previously enhanced through the creation of an intertidal terrace and sand martin bank. These features are to be retained and enhanced in any site redevelopment. Any site redevelopment should ensure these features are retained and enhanced, while maintaining the public right to	Does not relate to soundness In response to the Port of London Authority's concerns regarding the use of the Creek for navigation and impacts on the safeguarded Brewery Wharf (located in RB	Port of London Authority SREP1.1 & SREP1.2

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			<u>navigate. In line with London Plan Policy 7.26, the potential for conflicts of use or disturbance in relation to the safeguarded Brewery Wharf should be minimised with any redevelopment.</u>	Greenwich).	
AM51	51	Site Ref: SA10 Other comments	<u>A phased development may be appropriate and individual sites within the allocation need not come forward at the same time however there must be a comprehensive approach to development.</u> In line with Core Strategy Policy 4...	Does not relate to soundness In response to Milton BVI Group's comments that individual sites within the allocation may come forward at different times.	Milton BVI Group SREP2.3
AM52	51	Site Ref: SA10 Other comments	<u>Thames Water have concerns regarding water supply but have no current concerns regarding waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.12
AM53	51	Site Ref SA10 Strategic Flood Risk Assessment/Sequential Test	'... PPS25 <u>NPPF paragraph 102</u> Exception Test would need to be satisfied (Sequential Test Report Ref: DCE18).'	To reflect the publication of the NPPF.	LBL
AM54	54	Site Ref: SA11	<u>In line with London Plan Policy 7.26, the potential for</u>	Does not relate to soundness	Port of London

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		Other comments	<u>conflicts of use or disturbance in relation to the safeguarded Brewery Wharf should be minimised with any redevelopment.</u>	n response to the Port of London Authority's concern regarding impacts on the safeguarded Brewery Wharf (located in RB Greenwich)	Authority SREP1.3
AM55	54	Site Ref: SA11 Other comments	<u>Thames Water have concerns regarding both water supply and waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.13
AM56	54	Site Ref SA11 Strategic Flood Risk Assessment/Sequential Test	the <u>PPS25 NPPF paragraph 102</u> Exception Test would need to be satisfied (Sequential Test Report Reference DCE20).	To reflect the publication of the NPPF.	LBL
AM57	58	Site Ref SA13 Site characteristics Within/adjacent to a	Within the proposed -Deptford Creekside Conservation Area	Update to reflect designation of the Conservation Area	LBL

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		Conservation Area			
AM58	58	Site Ref SA13 Site characteristics Other	The proposed route of the Waterlink Way passes along the <u>eastern</u> edge of the creek at this site , <u>adjacent to the Creek</u> .	Correction	LBL
AM59	58	Site Ref: SA13 Other comments	Any development <u>should be informed through an understanding of the site's historic significance and</u> would need to preserve and enhance the character of the proposed Deptford Creekside Conservation Area.	Does not relate to soundness In response to English Heritage's concerns	English Heritage SREP12.1
AM60	63	Site Ref SA15 Site characteristics Planning Status	Planning Application approved September 2010. Ref: DC/10/74507. <u>This application is now implemented</u> .	Update to reflect the implementation of the planning permission.	LBL
AM61	66	Site Ref: SA16 Other comments	<u>Thames Water have concerns regarding water supply capability but do not currently have concerns regarding was water capability to the site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.14

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AM62	69	Site Ref: SA17 Other comments	<u>Proposals should take into account noise and other impacts from the railway and proposals should comply with London Overground's infrastructure protection requirements.</u>	Does not relate to soundness In response to Transport for London's concerns sites adjoining railway lines.	Transport for London SREP10.6
AM63	69	Site Ref: SA17 Other comments	<u>Thames Water currently have no concerns regarding water supply or waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.15
AM64	72	Site Ref: SA18 Other comments	...to give people a sense of arrival; <u>improve the interchange with buses;</u> and ensure a legible route into the town centre. Better use will be made of the commercial accommodation by redesigning the layout to include residential and improve the vitality to the town centre.	Does not relate to soundness In response to TfL comments regarding the interchange with buses.	Transport for London SREP10.16
AM65	72	Site Ref: SA18 Other comments	<u>Applicants should involve Transport for London in the design of any new station entrance and changes to bus stops to ensure it meets operational requirements.</u>	Does not relate to soundness In response to TfL comments regarding their involvement in applications.	Transport for London SREP10.16
AM66	72	Site Ref: SA18 Other	<u>Proposals should take into account noise and other impacts from the railway and proposals should comply with London Overground's infrastructure protection</u>	Does not relate to soundness In response to Transport for London's concerns sites adjoining railway lines.	Transport for London SREP10.7

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		comments	<u>requirements.</u>		
AM67	72	Site Ref: SA18 Other comments	<u>Thames Water have concerns regarding water supply capability but do not have concerns about waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.16
AM68	75	Site Ref: SA19 Other comments	<u>Proposals should take into account noise and other impacts from the railway and proposals should comply with London Overground's infrastructure protection requirements.</u>	Does not relate to soundness In response to Transport for London's concerns sites adjoining railway lines.	Transport for London SREP10.8
AM69	75	Site Ref SA19	<u>Thames Water currently have no concerns regarding water supply or waste water capability to the site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SSREP5.17
AM70	78	Site Ref SA20	<u>Thames Water have concerns regarding water supply capability but do not have concerns about waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.18
AM71	80	Site Ref SA21	Thames Water do not currently envisage concerns regarding water supply or waste water capability to this site. <u>Thames Water have concerns regarding water supply</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the	Thames Water SREP5.19

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			<u>capability but do not have concerns about waste water capability to this site.</u>	site.	
AM72	82	Site Ref SA22	Thames Water have concerns regarding water supply capability to this site but do not have no current concerns about waste water /sewerage network capacity capability to this site.	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.20
AM73	82	Site Ref SA22 Strategic Flood Risk Assessment/Sequential Test	'...PPS-25 NPPF paragraph 102 Exception Test would need to be satisfied (Sequential Test Report Reference ADD17).'	To reflect the publication of the NPPF.	LBL
AM74	85	Site Ref: SA23 Other comments	<u>Proposals should take into account noise and other impacts from the railway and proposals should comply with London Overground's infrastructure protection requirements.</u>	Does not relate to soundness In response to Transport for London's concerns sites adjoining railway lines.	Transport for London SREP10.9
AM75	87	Site Ref: SA24 Other comments	<u>Proposals should take into account noise and other impacts from the railway and proposals should comply with London Overground's infrastructure protection requirements.</u>	Does not relate to soundness In response to Transport for London's concerns sites adjoining railway lines.	Transport for London SREP10.10

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AM76	91	Site Ref SA25 Site characteristics Other	<u>Operational gas holders (Health and Safety Executive PADHI guidance applies).</u>	Correction	LBL
AM77	91	Site Ref SA25 Site characteristics Planning status	Outstanding Planning permission <u>granted March 2012</u> (Ref: DC/11/78646/7/8&9) to increase the Phase 2 retail floor by 586 sq m.	Update to reflect current planning status	LBL
AM78	92	Site Ref SA25 Other comments	<u>Proposals should seek to reduce car dependency, improve public transport, cycling and walking access and promote more sustainable forms of development.</u>	Does not relate to soundness In response to TfL concerns about sustainable forms of transport to access the out of centre retail park.	Transport for London SREP10.17
AM79	92	Site Ref SA25 Other comments	<u>Thames Water have concerns regarding water supply capability but do not have concerns about waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.21
AM80	94	Site Ref SA26	<u>Applicants should involve Transport for London in the design of any new station entrance and changes to bus</u>	Does not relate to soundness In response to TfL comments regarding	Transport for London

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		Other comments	<u>stops to ensure it meets operational requirements.</u> <u>Consideration could be given to the interchange with buses.</u>	their involvement in applications and improvements to the interchange with buses.	SREP10.18
AM81	95	Site Ref SA26 Other comments	Thames Water have no current concerns regarding water supply capability to this site but have concerns about waste water/sewerage network capacity. <u>Thames Water currently have no concerns regarding water supply or waste water capability to the site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.22
AM82	97	Site Ref SA27 Other comments	<u>Applicants should involve Transport for London in the design of any new station entrance and changes to bus stops to ensure it meets operational requirements.</u> <u>Consideration could be given to the interchange with buses.</u>	Does not relate to soundness In response to TfL comments regarding their involvement in applications and improvements to the interchange with buses.	Transport for London SREP10.18
AM83	97	Site Ref SA27 Other comments	<u>Proposals should take into account noise and other impacts from the railway and proposals should comply with London Overground's infrastructure protection requirements.</u>	Does not relate to soundness In response to Transport for London's concerns sites adjoining railway lines.	Transport for London SREP10.11
AM84	97	Site Ref SA27 Other	Thames Water currently have no concerns regarding water supply capability but has concerns regarding waste water/sewerage capacity to this site.	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the	Thames Water SREP5.23

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		comments	<u>Thames Water currently have no concerns regarding water supply or waste water capability to this site.</u>	site.	
AM85	100	Site Ref SA28 Site characteristics Planning status	Application submitted Jan 2010 for housing and access to allotments (Ref:10/73314) <u>Planning permission granted November 2010 for housing and access to allotments (Ref: 10/73341)</u>	Update to reflect new planning permission.	LBL
AM86	100	Site Ref SA28 Other comments	<u>Proposals should take into account noise and other impacts from the railway and proposals should comply with London Overground's infrastructure protection requirements.</u>	Does not relate to soundness In response to Transport for London's concerns sites adjoining railway lines.	Transport for London SREP10.12
AM87	100	Site Ref SA28 Other comments	<u>Thames Water currently have no concerns regarding water supply or waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.24
AM88	103	Site Ref SA29 Other comments	<u>Proposals should take into account noise and other impacts from the railway and proposals should comply with London Overground's infrastructure protection requirements.</u>	Does not relate to soundness In response to Transport for London's concerns sites adjoining railway lines.	Transport for London SREP10.13
AM89	103	Site Ref SA29	Thames Water currently has no concerns regarding water	Does not relate to soundness	Thames Water

Ref	Page (in tracked changes version)	Paragraph/ policy/ section/ figure (in tracked changes version)	Amendment/proposed change (deleted text is in struck through; new text is in bold and underline)	Reason for change	Suggested by
		Other comments	supply capability but has concerns over waste water/sewerage network capacity. <u>Thames Water currently have no concerns regarding water supply or waste water capability to this site.</u>	In response to Thames Water concerns about water/waste water capacity on the site.	SREP5.25
AM90	106	Site Ref SA30 Other comments	Thames Water has concerns regarding both water supply capability and waste water/sewerage infrastructure. <u>Thames Water have concerns regarding water supply capability but do not have concerns about waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.26
AM91	109	Site Ref SA31 Other comments	Thames Water currently have no concerns regarding water supply capability but have concerns regarding waste water services/sewerage network capacity to this site. <u>Thames Water currently have no concerns regarding water supply or waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.27
AM92	112	Site Ref SA32 Other comments	Thames Water currently has concerns regarding both water supply capability and waste water services/sewerage infrastructure. <u>Thames Water currently have no concerns regarding water supply or waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.28
AM93	115	Site Ref SA33	Thames Water do not currently envisage infrastructure	Does not relate to soundness	Thames Water

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		Other comments	<p>concerns regarding water supply capability but have concerns regarding waste water services/sewerage network capacity to this site.</p> <p><u>Thames Water currently have no concerns regarding water supply or waste water capability to this site.</u></p>	In response to Thames Water concerns about water/waste water capacity on the site.	SREP5.29
AM94	118	Site Ref SA34 Site characteristics Planning status	<p>Application submitted for southern part of the site. Ref: DC/10/74319.</p> <p><u>Application not submitted.</u></p>	Update to reflect planning permission status (previous application was withdrawn).	LBL
AM95	119	Site Ref SA34 Other comments	<p>Thames Water has no current concerns over water supply capability but concerns over the sewerage network capacity to this site.</p> <p><u>Thames Water currently have no concerns regarding water supply or waste water capability to this site.</u></p>	<p>Does not relate to soundness</p> <p>In response to Thames Water concerns about water/waste water capacity on the site.</p>	Thames Water SREP5.30
AM96	121	Site Ref SA35 Site characteristics	<p>Live work</p>	Correction	LBL

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		Planning Status			
AM97	121	Site Ref SA35 Other comments	Thames Water currently has no concerns regarding water supply capability but do have concerns over waste water services/sewerage network capability. <u>Thames Water have concerns regarding water supply capability but do not have concerns about waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.31
AM98	122	Site Ref SA35 Sustainability Appraisal	...flood risk, air potential land contamination...	Correction	LBL
AM99	130	Site Ref SA38 Site characteristics Planning status	History of applications for self-storage – approximately 8. Application for housing refused in 2007 and dismissed at appeal (Ref: DC/06/63234 & A). Outstanding planning application (Ref: DC/11/76836). <u>Planning permission for housing granted December 2011 (Ref: DC/11/76836).</u>	Update to reflect planning permission status	LBL
AM100	130	Site Ref SA38 Other	Thames Water currently have no concerns regarding this site's water supply capability or waste water/sewerage capacity.	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the	Thames Water SREP5.32

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		comments	<u>Thames Water have concerns regarding water supply capability but do not have concerns about waste water capability to this site.</u>	site.	
AM101	133	Site Ref SA39 Site characteristics Planning status	(Application Ref: 09/7956 <u>09/71953</u> ; Appeal Ref: C5690/A/09/2114438)	Correction	LBL
AM102	133	Site Ref SA39 Other comments	Thames Water have no concerns regarding both water supply or waste water/sewerage network capabilities to this site. <u>Thames Water have concerns regarding water supply capability but do not have concerns about waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.33
AM103	136	Site Ref SA40 Site characteristics Indicative housing	42 <u>40 to 60</u>	Correction - Update to reflect the expected combined capacity of all sites.	LBL

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		capacity (dwellings)			
AM104	139	Site Ref SA41 Site characteristics Planning status	Outstanding p Planning application permission granted February 2012 (Ref: DC/11/77798) for community and office uses	Update to reflect planning permission status	LBL
AM105	140	Site Ref SA41 Strategic Flood Risk Assessment/Sequential Test	The PPS 25 NPPF paragraph 102 Exception Test would need to be satisfied...	To reflect the publication of the NPPF.	LBL
AM106	142	Site Ref SA42 Other comments	Thames Water currently has no concerns over water supply capability but has concerns over waste water services/sewerage infrastructure. Thames Water currently have no concerns regarding water supply or waste water capability to this site.	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.34
AM107	143	Site Ref SA42	...hence the PPS 25 NPPF paragraph 102 Exception Test would need to be satisfied.	To reflect the publication of the NPPF.	LBL

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		Strategic Flood Risk Assessment/Sequential Test			
AM108	145	Site Ref SA44	<u>Thames Water have concerns regarding water supply capability but do not have concerns about waste water capability to this site.</u>	Does not relate to soundness In response to Thames Water concerns about water/waste water capacity on the site.	Thames Water SREP5.35
AM109	162	Paragraph 2.38	As a result of that survey, newly proposed SINC and proposed additions and deletions to existing SINC <u>were suggested and these</u> are set out below.	Clarification	LBL
AM110	189	Paragraph 2.46	...in line with PPS4 <u>NPPF paragraph 23</u> and the London Plan...	To reflect the publication of the NPPF.	LBL
AM111	189	Footnote 39	PPS4 <u>The NPPF (Annex 2: Glossary)</u> defines primary frontages as those “likely to include a high proportion of retail use”; whereas “secondary frontages provide greater opportunity for a diversity of uses”	To reflect the publication of the NPPF.	LBL
AM112	193	Glossary Affordable Housing	Includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should:	To reflect the publication of the NPPF.	LBL

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			<ul style="list-style-type: none"> • Meet the needs of eligible households, including availability at a cost low enough for them to afford, determined with regard to local house prices • Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision (Annex B PPS3). <p><u>Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices.</u></p> <p><u>Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision (NPPF Annex 2: Glossary).</u></p>		
AM113	193	Glossary Annual Monitoring Report	<p>A report submitted to the Government by local authorities or regional planning bodies assessing progress with and the effectiveness of a Local Development Framework.</p> <p>A report produced by the Local Authority to assess progress</p>	To reflect the publication of the NPPF.	LBL

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			with and the effectiveness of the Local Development Framework.		
AM114	193	Glossary Area Action Plan	Area Action Plan A type of development plan document focused on a specific location of an area subject to conservation or major change (for example, major regeneration areas).	To reflect the publication of the NPPF.	LBL
AM115	193	Glossary Community Infrastructure Levy	<u>Community Infrastructure Levy (CIL) A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.</u>	To reflect the publication of the NPPF.	LBL
AM116	194	Glossary – Development Plan	<u>Development Plan</u> <u>This includes adopted Local Plans, neighbourhood plans and the London Plan, and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.</u>	In response to the National Planning Policy Framework, published in March 2012.	LBL
AM117	194	Glossary – Development Plan Document	A local development document that has been subject to independent testing and has the weight of development plan status. Replaces the Local Plans system. <u>A Local Development Document that has been drawn up by the local planning authority in consultation with the community, has been subject to independent testing and</u>	In response to the National Planning Policy Framework, published in March 2012.	LBL

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			<u>has the weight of development plan status. This terminology has been replaced with 'Local Plan' for new documents, but remains for pre-existing documents (i.e. Lewisham Core Strategy DPD, 2011).</u>		
AM118	194	Glossary District Centre	<u>District Centre A centre that provides convenience goods and services to local communities and is accessible by public transport, walking and cycling. District centres typically contain 10,000-50,000 square metres of retail floorspace.</u>	Correction	LBL
AM119	194	Glossary Edge of Centre	<u>Edge of Centre For retail purposes, a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.</u>	Correction	LBL
AM120	194	Glossary Gypsies and	...travelling show people or circus people travelling together as such (Circular 01/2006 Planning policy for traveller sites)	To reflect the publication of the NPPF.	LBL

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		Travellers	<u>(March 2012)</u>		
AM121	194	Glossary Independent Examination/Examination in Public	The process by which a planning inspector may publicly examine a Development Plan Document, or a Statement of Community Involvement , before issuing a report. The findings set out in the report are recommendations to the local authority.	Updated to reflect the fact that Examinations are no longer are required for the Statement of Community Consultation.	LBL
AM122	194	Glossary Issues and Options, Preferred Options and Further Options	Issues and Options, and Preferred Options <u>and Further Options</u> Two 'Pre submission' consultation stages...	Correction	LBL
AM123	195	Glossary Local Development Document	Sits within the portfolio <u>Local Development Framework</u> and comprise Development Plan Documents <u>and Local Plans</u> that have been subject to independent testing and have the weight of development plan status and Supplementary Planning Documents that are not subject to independent testing and do not have development plan status.	To reflect the publication of the NPPF.	LBL

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AM124	195	Glossary Local Employment Location (LEL)	<u>Local Employment Location (LEL)</u> <u>Land, as shown on the Policies Map, that is of local significance and provides goods and services for the local economy, which is used for business use, industrial use, storage and distribution uses, generally being those uses falling within Classes B1, B2 and B8 of the Use Class Order.</u>	Correction	LBL
AM125	195	Glossary Local Neighbourhood Centre	<u>Local Neighbourhood Centre</u> <u>A centre that serves a localised catchment often most accessible by walking and cycling and typically contains mostly convenience goods and other services.</u>	Correction	LBL
AM126	195	Glossary Local Plan	<u>Local Plan</u> <u>A Local Development Document that has been drawn up by the local planning authority in consultation with the community, has been subject to independent testing and has the weight of development plan status.</u>	To reflect the publication of the NPPF.	LBL
AM127	195	Glossary Major Centre	<u>Major Centre</u> <u>A centre that has a borough-wide catchment and typically contains over 50,000 square metres of retail floorspace with a relatively high proportion of comparison goods relative to convenience goods. Major centres may</u>	Correction	LBL

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			<u>also have significant employment, leisure, service and civic functions.</u>		
AM128	195	Glossary Mixed Use Employment Location (MEL)	<u>Mixed Use Employment Location (MEL) Land currently in industrial use occupied by older and poorer quality industrial uses at low densities which may be incompatible with adjacent residential areas. The sites were considered by the Lewisham Employment Land Study to require redevelopment and have been designated to ensure mixed use development incorporating re-provision of business space to ensure the regeneration of a part of the borough where the environment is poor and levels of deprivation are high.</u>	Correction	LBL
AM129	195	Glossary National Planning Policy Framework	<u>National Planning Policy Framework</u> <u>The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied.</u>	To reflect the publication of the NPPF.	LBL
AM130	195	Glossary Out of Centre	<u>Out of Centre A location which is not in or on the edge of a centre but not necessarily outside the urban area.</u>	Correction	LBL

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AM131	195	Glossary Planning Obligation	<p><u>Planning Obligation</u> <u>A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.</u></p>	To reflect the publication of the NPPF.	LBL
AM132	195	Glossary Planning Policy Statement/Plan ning Policy Guidance	<p>Planning Policy Statement/Planning Policy Guidance Planning Policy Statements, which are gradually replacing Planning Policy Guidance Notes, are prepared by the Government after public consultation. These explain statutory provisions and provide guidance to local authorities and others on planning policy and the operation of the planning system. They also explain the relationship between planning policies and other policies which have an important bearing on issues of development and land use. Local authorities must take their contents into account in preparing development plans and supplementary planning documents. The guidance may also be relevant to individual planning applications and appeals.</p>	To reflect the publication of the NPPF.	LBL
AM133	196	Glossary Primary and secondary frontages	<p><u>Primary and secondary frontages</u> <u>Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide</u></p>	To reflect the publication of the NPPF.	LBL

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			<u>greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.</u>		
AM134	196	Glossary Sequential Test	Introduced into the planning system in relation to flood risk by the publication of Planning Policy Statement 25 (PPS25) in December 2006, + <u>A process primarily designed to steer development to areas at lowest risk from flooding (NPPF paragraphs 100-104)</u>	To reflect the publication of the NPPF.	LBL
AM135	196	Glossary Site of Importance for Nature Conservation	<u>Site of Importance for Nature Conservation (SINC) Sites of borough and local importance, as shown on the Policies Map, for the protection, management and promotion for the benefit of wild species and habitats, as well as the human communities that use and enjoy them. This also covers the creation and re-creation of wildlife habitats and the techniques that protect genetic diversity and can be used to include geological conservation.</u>	Correction	LBL
AM136	197	Glossary Strategic Flood Risk Assessment	...examines the risk involved with developing certain areas within the borough in accordance with Planning Policy Statement 25 the NPPF.	To reflect the publication of the NPPF.	LBL

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AM137	197	Glossary Strategic Industrial Location (SIL)	<p><u>Strategic Industrial Location (SIL) Land which is capable of housing essential infrastructure such as waste management, utilities and transport related functions including rail and bus depots, and capable of allowing 24 hour working. This land accommodates London's reservoir of industrial capacity for businesses that do not demand a high quality environment and which meet London's economic needs.</u></p>	Correction	LBL
AM138	197	Glossary Supplementary Planning Document	<p>A Local Development Document that has not been subject to independent testing and does not have the weight of development plan status. Supplementary Planning Documents replace Supplementary Planning Guidance that was part of the old planning system and helps to provide further detail on the policies contained in Development Plan Documents.</p> <p><u>Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning</u></p>	To reflect the publication of the NPPF.	LBL

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			<u>decisions but are not part of the development plan.</u>		
AM139	197	Glossary Town centre	<u>Town Centre</u> <u>Area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.</u>	To reflect the publication of the NPPF.	LBL
AM140	197	Glossary Waterlink Way	A long distance cycle/pedestrian way <u>route</u> ...	To reflect the publication of the NPPF.	LBL
AM141	198	List of Abbreviations	DCLG <u>NPPF National Planning Policy Framework</u> PPG Planning Policy Guidance Note PPS Planning Policy Statement	To reflect the publication of the NPPF.	LBL
AM142	200	Appendix 2 UDP Schedule 1: Proposals Removed	Map Ref. C2; Site Ref. 3; Site Address Silwood Triangle, Trundleys Road, SE8; Comments Site developed <u>Site designated as a Strategic Industrial Location in the Core Strategy</u>	Updated to reflect the adopted Core Strategy	LBL
AM143	202	Appendix 3	<i>Delete entire Appendix 3</i>	The removal of these sites was included at	LBL

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		Site Allocations Removed	Appendix 3 Site Allocations Removed	Proposed Submission stage for clarity. Reference to their removal is no longer required in the Submission plan.	

Responses to the Site Allocations Local Plan – Proposed Submission Consultation

(Proposed replacement version following the Inspector’s Question number 5)

November 16 2012

There were 16 respondents to the consultation, comprising 78 individual representations. Officers have examined the representations received and recommend that changes (Main Modifications) are made to the SALP to accommodate the representations made. The remaining comments received were either in support, comments or issues where the Council does not feel a change to the SALP is warranted. Proposed text deletions are marked using ~~strike through~~ and additions are marked in **bold and underlined**.

Three respondents stated that they wished to participate at the oral examination.

- Milton BVI Group (SREP2)
- CA Planning (SREP4)
- Workspace Group PLC (SREP7).

None of the representations received are considered by officers to require modifications necessary to make the SALP sound. However officers have recommended a number of additional modifications as a result of representations which are NOT considered to be a matter of soundness, but are considered to ‘improve’ the plan. Officers’ recommended full text changes are set out in two schedules that accompany this report, one of main modifications (LTCLP1.7) and one of additional modifications (LTCLP1.7a).

Respondent’s Name/Representation ID	Representation ID	Paragraph, Policy, Section, Figure	Comment (sound/unsound)	Summary of representation	Officers’ response	Change / No change	Change number in Schedule of changes
Port of London Authority (SREP1)	SREP1.1	SA10 Sun & Kent Wharf	Unsound	i. Reference should be made to London Plan Policy 7.26 and minimising the impact of any development on the safeguarded Brewery Wharf.	Officers do not agree that the Site Allocations Local Plan (LP) is unsound. i. It is recommended that reference to the London Plan and Brewery	Change - additional	AM50

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	SREP1.2			ii. Clarify what waterside access and environmental improvements are proposed. These should reflect the public right to navigate.	<p>Wharf is included.</p> <p>ii. No changes are proposed in relation to access arrangements or environmental improvements. Reference to maintaining the public right to navigate is recommended.</p> <p>Details regarding the nature and form of access / environmental improvements will be negotiated, submitted, assessed and determined as part of a planning application. Core Strategy policies CS12 and CS14 support a walking and cycling route in this location and Waterlink Way (cycle and pedestrian route) runs along the eastern boundary of the site, adjacent to the Creek.</p>	<p>modification</p> <p>Change - additional modification</p>	AM50
Port of London Authority (SREP1)	SREP1.3	SA11 Thanet Wharf	Unsound	Reference should be made to London Plan Policy 7.26 and minimising the impact of any development on the safeguarded Brewery Wharf.	Officers do not agree that the Site Allocations LP is unsound. Nonetheless it is recommended that reference to the London Plan and Brewery Wharf is included.	Change - additional modification	AM54

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Milton BVI Group (Vic Hester) (SREP2) Note: This respondent requested to attend the oral part of the examination	SREP2.1	Table 2.2 and Table 2.3	Unsound	Question whether the distinction between Mixed Use housing sites and Mixed Use employment locations is necessary.	<p>Officers do not agree that the Site Allocations LP is unsound.</p> <p>Mixed use housing sites refers to the Council allocating a site for a mix of land uses, of which housing is the primary land use.</p> <p>Mixed Use Employment Locations are a land use designation under the Core Strategy, where a certain percentage of employment space (B Uses) must be provided.</p> <p>No changes are proposed. The re-provision of employment uses, particularly B class uses on MELs is a key component of the release of land previously allocated as a SIL and is supported by the Lewisham Employment Land Study.</p> <p>Collectively the redevelopment of the MELs will provide a range of good quality premises to attract starter firms and more established businesses which will deliver major</p>	No change	N/A

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					<p>regeneration benefits for the north of the borough and in the two most deprived wards.</p> <p>Good quality business development on the MELs is key to achieving these regeneration goals whereas the mixed use housing sites are not located on land released from SIL and therefore often do not and have not contained employment uses. A wider mix of uses on the mixed use housing sites is considered appropriate.</p>		
<p>Milton BVI Group (Vic Hester) (SREP2)</p> <p>Note: This respondent requested to attend the oral part of the examination</p>	<p>SREP2.2</p> <p>SREP2.3</p>	SA10 Sun and Kent Wharf	Unsound	<p>i. Greater clarity should be provided on what is required with the development of a specific site within the wider allocation. For example, should the creative industries in the Cockpit Arms building be retained within that specific building?</p> <p>ii. Individual sites within the allocation need not come forward at the same time and</p>	<p>Officers do not agree that the Site Allocations LP is unsound.</p> <p>i. No changes are proposed. The site and any uses should be considered in totality. The location of uses will be considered and negotiated as part of the planning application process.</p> <p>ii. It is recommended that reference to phased development is included in support of this representation.</p>	<p>No change</p> <p>Change – additional modification</p>	<p>N/A</p> <p>AM51</p>

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	SREP2.4			<p>should not be expected to. This should be clear as part of the masterplan for the area.</p> <p>iii. Development of the site should be prioritised over other considerations that may affect viability and deliverability (such as land contamination, flooding, 50% affordable housing, Lewisham / Mayor's CIL).</p>	<p>iii. No changes are proposed. Viability and delivery issues are important matters that will be considered and negotiated as part of a planning application.</p>	No change	N/A
<p>Milton BVI Group (Vic Hester) (SREP2)</p> <p>Note: This respondent requested to attend the oral part of the examination</p>	SREP2.5	SA10 Sun and Kent Wharf	Unsound	Compliance issues with the NPPF.	<p>Officers do not agree that the Site Allocations LP is unsound. Officers have undertaken a compatibility self assessment which assessed the Local Plan against the requirements of the NPPF (Submission Library document SALP1.14). The assessment showed that there are no significant differences that would effect the overall strategy.</p>	No change	N/A
Andrew Wood (SREP3)	SREP3.1	SA39 Tyson Road (Rear of	Unsound	The site has significant local environmental value and should not be considered 'brownfield'.	<p>Officers do not agree that the Site Allocations LP is unsound. Development of this site has</p>	No change	N/A

Respondent's Name/Representation ID	Representation ID	Paragraph, Policy, Section, Figure	Comment (sound/unsound)	Summary of representation	Officers' response	Change / No change	Change number in Schedule of changes
	SREP3.2	Christian Fellowship)		The Council should reassess the site allocation and the environmental and biodiversity value of the land in the context of the NPPF.	planning permission (granted on appeal, Ref C5690/A/09/2114438) which included an assessment of the site's biodiversity and conditions regarding safeguarding the site's ecological assets. If this permission is not implemented a new application would be required that provided an updated assessment of all impacts of the proposed scheme.		
CA Planning (Alban Cassidy) (SREP4) Note: This respondent requested to attend the oral part of the examination	SREP4.1	SINC 12 Hither Green Sidings	Unsound	No evidence that the site is of importance for nature conservation. Should not be designated as a SINC.	No changes are recommended. In February 2006 the Greater London Authority carried out a survey across the borough of all Sites of Importance for Nature Conservation. The survey recorded a range of trees and shrubs as well as amphibians and bird species. Officers consider this survey shows the importance of the site and designation is appropriate.	No change	N/A
Thames Water (SREP5)	SREP5.1	Paragraph 1.28	Unsound	The DPD should include a paragraph stating that developers will be required to demonstrate adequate water supply, waste water capacity and surface water	Paragraph 1.28 already details this requirement. Officers recommend that text is added in relation to the separation of foul and surface flows.	Change – additional modification	AM14

Respondent's Name/Representation ID	Representation ID	Paragraph, Policy, Section, Figure	Comment (sound/unsound)	Summary of representation	Officers' response	Change / No change	Change number in Schedule of changes
				drainage is available on site			
Thames Water (SALP5)	SREP5.2-5.35	SA1, 2, 3, 4, 5, 6, 7, 8(a), 8(b), 9, 10, 11, 16, 17, 18, 19, 20, 21, 22, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 38, 39, 42, 44	Unsound	Site specific comments relating to water and waste water capabilities on individual sites.	Officers do not consider this a matter of soundness however changes are recommended for clarity in relation to each site allocation identified. Officers agree that these site specific comments should be updated to reflect the current situation.	Change – additional modification	AM29, AM30, AM32, AM35, AM37, AM41, AM42, AM43, AM46, AM49, AM52, AM55, AM61, AM63, AM67, AM69, AM70, AM71, AM72, AM79, AM81, AM84, AM87, AM89, AM90, AM91, AM92, AM93, AM95, AM97, AM100, AM102, AM106, AM108
Natural England (SREP6)	SREP6.1	SINC sites	Sound	Welcomes new SINCs and extensions to existing SINCs	Noted	No change	N/A
Tibbalds Planning (Workspace Group PLC) (SREP7)	SREP7.1	SA13 Creekside LEL, 1-17 & 2-14 Creekside,	Unsound	Feasibility work demonstrates that retention of the site in wholly employment uses will not secure the site's future as an employment location. A wider mix of uses,	Officers do not agree that the Site Allocations LP is unsound. The Core Strategy Spatial Policy 2 supports the retention of Local	No change	N/A

Respondent's Name/Representation ID	Representation ID	Paragraph, Policy, Section, Figure	Comment (sound/unsound)	Summary of representation	Officers' response	Change / No change	Change number in Schedule of changes
Note: This respondent requested to attend the oral part of the examination	SREP7.2	Deptford (Faircharm)		<p>including housing, is required to support an economically viable redevelopment.</p> <p>The inclusion of the site as a location for employment uses only will not secure long term sustainable economic growth, will not allow the flexibility and adaptability required to respond to the needs and demands of the creative sector. The employment designation is not deliverable and places an unnecessary constraint on the landowner.</p>	Employment Locations and specifies that in the case of Lower Creekside this is to ensure the retention of the creative industries. The retention of the Local Employment Locations is supported by the recommendations of the Lewisham Employment Land Study.		
Planning Perspectives (Kier Property) (SREP8)	SREP8.1	SA25 Former Bell Green Gas Works	Unsound	The state of the market makes delivery of the indicative business/industrial floorspace unlikely. The allocation should be changed to be more flexible and reflect the latest planning application.	<p>Officers to not agree that the Site Allocations LP is unsound.</p> <p>No changes are proposed. The Core Strategy sets out the maximum retail and non food retail floorspace. Any proposed changes to floorspaces will be considered as part of the planning application process. This is supported by the Lewisham Retail Capacity Study,</p>	No change	N/A

Respondent's Name/Representation ID	Representation ID	Paragraph, Policy, Section, Figure	Comment (sound/unsound)	Summary of representation	Officers' response	Change / No change	Change number in Schedule of changes
					November 2009.		
Royal Mail (SREP9)	SREP9.1	Blackheath Post Office	Not stated	Request inclusion of a new site, Blackheath Post Office, as an allocated site for residential or residential led mixed-use development, provided that Royal Mail's operations are relocated elsewhere.	This site was not included as an allocated site as the post office is operational and therefore the site is currently unavailable for development within the lifespan of the Site Allocations LP. Officers consider that the site could come forward as a windfall site at a later date.	No change	N/A
TfL Planning (SREP10)	SREP10.1	Paragraph 1.7	Not stated	List all other sites included in Lewisham and Catford AAPs	All allocations included as part of the Site Allocations LP will be shown on the Policies Map. Not all other sites are identified or allocated as the Catford Area Action Plan is currently in early drafting stages.	No change	N/A
TfL Planning (SREP10)	SREP10.2	Paragraph 1.29	Not stated	Reference future transport projects and the significant implications they may have on site allocations in the borough (potential Bakerloo Line and Docklands Light Railway extensions).	Reference to future transport projects and the potential implication on the allocated sites is recommended to be included as part of the LP.	Change – additional modification	AM15
TfL Planning (SREP10)	SREP10.3 – 10.13	SA5, SA6, SA8(b), SA17, SA18, SA19, SA23, SA24, SA27,	Not stated	The design of schemes should take account of noise and other disturbance from the railway.	Reference to impacts arising from the railway is recommended to be included for each of the relevant allocations.	Change – additional modification	AM36,AM40, AM45, AM62, AM66, AM68, AM74, AM75, AM83, AM86,

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		SA28, SA29		Adjoining development should comply with London Overground's infrastructure protection requirements.	Reference to London Overground infrastructure protection is recommended to be included for each of the relevant allocations.	Change – additional modification	AM88
TfL Planning (SREP10)	SREP10.14	SA6	Not stated	SA6 TfL should be involved in the design of any new station entrance and changes to bus stops to ensure it meets operational requirements. The allocation should refer to the retention and improvement of bus stops/stands at the site.	Reference to bus stands and stops at the site and TfL's involvement in this and the redesign of any station entrances is recommended for inclusion in this site allocation.	Change – additional modification	AM38 & AM39
TfL Planning (SREP10)	SREP10.15	SA12 and others LELs	Not stated	Transport uses should be included as an appropriate use.	Local Employment Locations are defined established employment locations with established land uses generally falling within the B Use Classes. The allocation as a LEL does not preclude transport uses coming forward.	No change	N/A
TfL Planning (SREP10)	SREP10.16	SA18 Forest Hill Station	Not stated	TfL involved in the design to ensure operational requirements are met. Consideration could be given to the improvement of the interchange with buses.	Reference to TfL's involvement in the redesign of any station entrances and the interchange with buses is recommended for inclusion in this site allocation.	Change – additional modification	AM64 & AM65
TfL Planning (SREP10)	SREP10.17	SA25 Former Bell Green Gas	Not stated	As an out of centre retail park proposals should seek to reduce car dependency, improve public	Reference to sustainable forms of transport is recommended for inclusion in this site allocation.	Change – additional modification	AM78

Respondent's Name/Representation ID	Representation ID	Paragraph, Policy, Section, Figure	Comment (sound/unsound)	Summary of representation	Officers' response	Change / No change	Change number in Schedule of changes
		works		transport, cycling and walking access and promote more sustainable forms of development.			
TfL Planning (SREP10)	SREP10.18	SA26 and SA27 Brockley Cross Local Hub	Not stated	TfL involved in the design to ensure operational requirements are met. Consideration could be given to the improvement of the interchange with buses.	Reference to TfL's involvement in the redesign of any station entrances and the interchange with buses is recommended for inclusion in this site allocation.	Change – additional modification	AM80 & AM82
TfL Planning (SREP10)	SREP10.19	SINC 13 New Cross and New Cross Gate Railsides	Not stated	An updated conservation assessment should take account of the London Overground and Thameslink works. Much of the woodland no longer exists. Network Rail and TfL should be involved in an assessment.	Officers acknowledge that ideally reviews of SINC designations should take place at least every ten years. The last review was undertaken in 2006 and therefore officers realise the importance of programming in a review by 2016. Although works are currently taking place the site may regenerate to be of value.	No change	N/A
TfL Planning (SREP10)	SREP10.20	Southern End of Bridgehouse Meadows	Not stated	Presence of the Common Lizard may warrant designation as a SINC	Officers acknowledge that ideally reviews of SINC designations should take place at least every ten years. The last review was undertaken in 2006 and therefore officers realise the importance of programming in a review by 2016.	No change	N/A
TfL Planning	SREP10.21	C2	Not stated	Permanent development of the land	This site has been included within	No change	N/A

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(SREP10)		Silwood Triangle		is yet to take place. The site should continue to be allocated for mixed railway operations, transport, waste and B1, B2 and B8 uses	the Surrey Canal Road Strategic Industrial Location in the adopted Core Strategy in general conformity with the London Plan. This designation protects this site for B1, B2, B8, appropriate sui generis uses and activities that support the continued functioning of London as a whole such as waste management, transport and utilities and uses that require 24 hour functioning. Although the uses currently on site may be temporary it is considered that the SIL designation meet the requirements of TfL planning for this site, and a specific site allocation is not necessary.		
TfL Property (SREP11)	SREP11.1	Whole document	Not stated	No comments	Noted	N/A	N/A
English Heritage (SREP12)	SREP12.1	SA13 Creekside LEL	Not stated	Proposals should be informed through an understanding of the site's historic significance and reference to Deptford Creekside Conservation Area should be made in supporting text.	Reference to an understanding of the site and area's historic significance and the Deptford Creekside Conservation Area is recommended.	Change – additional modification	AM59
Mayor's Office for Policing	SREP13.1	Brockley Police Station	Not stated	Proposed inclusion of these two sites for residential led, mixed-use	These sites were not included as allocated sites as the police stations	No change	N/A

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and Crime / Metropolitan Police Service (SREP13)		Sydenham Police Station		development.	are operational and therefore the sites are currently unavailable for development within the lifespan of the Site Allocations LP. Officers considered that the sites could come forward as windfall sites at a later date.		
Environment Agency (SREP14)	SREP14.1	Whole document	Sound	The SA DPD is based on a robust evidence base and the inclusion of SFRA, Sequential test and Sustainability appraisal within each allocation is welcomed.	Noted	No change	N/A
Highways Agency (SREP15)	SREP15.1	Whole document	Not stated	No comments	Noted	N/A	N/A
Coal Authority (SREP16)	SREP16.1	Whole document	Not stated	No comments	Noted	N/A	N/A