

Responses to the Site Allocations Local Plan Recommended Modifications Consultation

16 November 2012

There were 14 respondents to the consultation.

In addition to the three respondents to the Proposed Submission Consultation (see Examination Library document SALP1.7) who stated they wished to appear at the hearings, the following respondent to the Recommended Modifications Consultation stated that they wished to appear.

- London Gypsy and Traveller Unit (SMODREP10)

One respondent stated that they wished to be informed of the Examination in Public timetable and would seek to support the inclusion of sites at the EiP.

- CgMs for Mayor's Office for Policing and Crime / Metropolitan Police Service (SMODREP6)

Consultation on the recommended modifications closed 12 November at 17:00. Three responses were received after the close of consultation which are all included in the table below.

- CgMs for Mayor's Office for Policing and Crime / Metropolitan Police Service (SMODREP6) – received by email 12 November 2012 at 17:28
- TfL Planning (SMODREP5) – received by email 13 November 2012 at 12:48
- Thomas Wrenn Homes Ltd (SMODREP14) – received by email 15 November 2012 at 14:49

Respondent's Name/Representation ID	Representation ID	Paragraph, Policy, Section, Figure	Agree with inclusion of recommended modification	Further comments	Officers' response	Modification?	Modification number in Schedule of modification
Port of London Authority (SMODREP1)	SMODREP1.1	SA10 Sun & Kent Wharf SA11 Thanet Wharf	Yes	Support the recommended modifications.	Noted – no further changes are recommended	No change	N/A

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Milton BVI Group (Vic Hester) (SMODREP2)	SMODREP2.1	SA10 Sun and Kent Wharf	Yes	The amendment recognising that the individual sites need not come forward at the same time is welcomed. However, the modifications could go further to provide clarity as required by Paragraphs 153-4 of NPPF.	Noted – no further changes are recommended	No change	N/A
	SMODREP2.1			Part of the site outlined in red covers not just Sun Wharf and Kent Wharf but the Cockpit Arts building as well. This building already provides employment floor space for small, local industries. Should the Cockpit Arts building be retained within this red line? It falls under separate ownership and already provides long term employment floor space. Does the suggested overall 20% floor space requirement for employment purposes in the allocation include the Cockpits Arts site? In other words will its existing floor space contribute to the overall 20% total should a masterplan be drawn up for the red lined site?	The Council expects all parties to work together on a comprehensive masterplan that addresses the mix of uses, distribution and quantum of development across the entire site. Employment uses across the entire allocated site, SA10, including the Cockpit Arts site, should be at least 20% of the total floorspace.	No change	N/A
	SMODREP2.1			Finally, a further modification should have been included recognising that should deliverability of the site(s) be hampered by viability that the objective behind	Noted - no further changes are recommended. Viability and delivery issues are	No change	N/A

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				regenerating the area with new growth/development takes precedence.	important matters that will be considered and negotiated as part of a planning application.		
Thames Water (SMODREP3)	SMODREP3.1-3.17	SA1, 3, 4, 5, 6, 8(a), 8(b), 15, 17, 18, 19, 20, 21, 22, 37, 38, 42	Yes	Thames Water agrees to the recommended modification. If it is helpful the following additional text could also be included: "Developers may contact Thames Water to discuss the infrastructure necessary to serve the development on 0845 8502777."	Change is recommended – for inclusion in the Additional Modifications schedule.	Change	Not yet included in the Additional Modifications schedule.
Thames Water (SMODREP3)	SMODREP3.18	9, 41, Table 2.7	Yes	Thames Water agrees to the proposed modification.	Noted – no further changes are recommended	No change	N/A
Thames Water (SMODREP3)	SMODREP3.19	Table 2.5	Yes	No comment	Noted – no further changes are recommended	No change	N/A
Natural England (SMODREP4)	SMODREP4.1	Whole document	Yes	The proposed modifications ensure stronger compliance with the National Planning Policy Framework and help strengthen the document overall.	Noted – no further changes are recommended	No change	N/A
TfL Planning (SMODREP5)	SMODREP5.1	Whole document	Yes	TfL recognises that changes have been made since the proposed submission stage with respects to our previous comments and welcomes these, although we believe that	Late representation Noted – no further changes are recommended	No change	N/A

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	SMODREP5.2	Whole document		<p>further changes can still be made.</p> <p>TfL should be consulted when a development could affect TfL infrastructure (e.g. highway, DLR, LO and/or bus). TfL should also be consulted about proposals which could affect the Transport for London Road Network (TLRN) and the Strategic Road Network (SRN). TfL should also be consulted about proposals which could impact upon bus or other public transport services.</p>	Noted – no further changes are recommended	No change	N/A
	SMODREP5.3	Paragraph 1.7		It would be useful to list, perhaps as an appendix, sites included in the Lewisham and Catford town centres Area Action Plans.	Noted. This is the same as SREP10.1 to the Proposed Submission Consultation – see corresponding Officers' response.	No change	N/A
	SMODREP5.4	Does not relate to the SALP		TfL suggests the final sentence of this section be amended to read, <i>"The London Plan identifies a southern extension to the Bakerloo Line and a southwards extension to the DLR from Lewisham. When these are progressed, it will be appropriate to assess</i>	This comment does not relate to the Site Allocations local plan but relates to the Lewisham town centre local plan.	No change	N/A

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	SMODREP5.5	SA12 and other LELs		<p><i>the land use and access implications for the AAP."</i></p> <p>Transport uses should be included as an appropriate use.</p>	Noted. This is the same as SREP10.15 to the Proposed Submission Consultation – see corresponding Officers' response.	No change	N/A
	SMODREP5.6	SINC13 New Cross and New Cross Gate Railsides		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.	Noted. This is the same as SREP10.19 to the Proposed Submission Consultation – see corresponding Officers' response.	No change	N/A
	SMODREP5.7	Southern end of Bridgehouse Meadows		Presence of the Common Lizard may warrant designation as a SINC.	Noted. This is the same as SREP10.20 to the Proposed Submission Consultation – see corresponding Officers' response.	No change	N/A
CgMs for Mayor's Office	SMODREP6.1	Brockley Police Station		The Council response to our representations stated: 'These sites were	Late representation The sites are currently in	No change	N/A

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for Policing and Crime / Metropolitan Police Service (SMODREP6) Note: This respondent requested to be kept informed of the examination timetable		Sydenham Police Station		not included in the Proposed Submission DPD as they are currently unavailable for development. It was considered that the sites could come forward as windfall sites at a later date.' This is considered unacceptable as the sites will come forward for development in the lifetime of the Site Allocations Local Plan. The Mayor's Office for Policing and Crime (MOPAC) wish to pursue the inclusion of these sites in the Site Allocations Local Plan and will seek to support their inclusion at the Examination in Public.	operational use and would not be available or achievable at the time of potential plan adoption. Officers considered that the sites could come forward as windfall sites at a later date.		
Environment Agency (SMODREP7)	SMODREP7.1	Whole document		The Environment Agency support the proposed modifications.	Noted – no further changes are recommended	No change	N/A
Highways Agency (SMODREP8)	SMODREP8.1	Whole document	Not stated	No comment.	Noted – no further changes are recommended	No change	N/A
Marine Management Organisation (SMODREP9)	SMODREP9.1	Whole document	Not stated	For works that include any section of river, it is important to establish whether these are under tidal influence. If they are then we would encourage Lewisham to include	Change is recommended – for inclusion in the Additional Modifications schedule.	Change	Not yet included in the Additional Modifications

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				reference to Marine and Coastal Access Act 2009, the Marine Management Organisation, Marine Policy Statement, marine planning and marine licensing within these plans to ensure that all those concerned are clear about the regulatory framework surrounding tidal stretches of river.			schedule.
London Gypsy and Traveller Unit (SMODREP10) Note: This respondent requested to attend the oral part of the examination	SMODREP10.1	Whole document Lack of a Gypsy and Traveller site allocation	Not stated	Detailed comments objecting to the process for the preparation of the SALP and the process for the Gypsy and Traveller site allocation, particularly in relation to consultation procedures. Consider a site or sites for Gypsies and Travellers should be incorporated into the SALP prior to Examination in January 2013. Provides detailed comments on compliance with the NPPF and comments on the Council's Self Assessment of Compatibility and Duty to Cooperate. Provides detailed comments on the site selection process to date.	This is not a representation regarding the SALP schedules of recommended modifications issued for public consultation in Oct / Nov 2012. The Council has responded to the Inspector's SALP question 6 which sets out the Council's preference for preparing a specific Travellers' Site(s) Local Plan.	No change	N/A

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				<p>Failure of the Council to inform the London Gypsy and Traveller Unit of consultation on the SALP.</p> <p>Request to attend at the Examination in order to make full representations on these matters.</p>			
CgMs for Trundleys Road (SMODREP11)	SMODREP11.1	<p>Site not included in the submission SALP</p> <p>Site at 104-198 Trundleys Road, SE8 5JE</p>	No comment	<p>Under Sites falling within the Regeneration and Growth Areas this site should be included as either a Housing, Mixed Use Housing or Mixed Use Employment Location.</p> <p>The Council's own Employment Land Study states: <i>The Trundleys Road buildings are of a poor quality, and yet form a site that is a very good industrial employment opportunity. Bounded by railways, Surrey Canal Road and Trundleys Road the site is self-contained and separate from residential areas (apart from the few first floor residences above the shops). The site is of a sufficient size to present a comprehensive redevelopment opportunity, although a new ELL extension switching station has</i></p>	<p>This is not a representation regarding the SALP schedules of recommended modifications issued for public consultation in Oct / Nov 2012. The comments made are not considered by the Council as applicable to this stage of consultation.</p> <p>This site is included within the Surrey Canal Road Strategic Industrial Location (SIL) as designated in Lewisham's adopted Core Strategy.</p>	No change	N/A

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				<p><i>significantly reduced this potential.</i></p> <p>On the basis in particular of the last comment, the park opposite (good for residential), the existing residential and retail uses, and its small size, the site does not warrant its current Employment designation. Regeneration and Growth is only likely to take place here if residential or a mix of uses including residential is permitted.</p>			
St Modwen (Leegate Centre) (SMODREP12)	SMODREP12.1	SA22 Leegate Centre, Lee Green	Not stated	<p>We support the identification of the site for mixed use retail-led development with housing, offices and hotel.</p> <p>We would reiterate our comment that the red line still seems to include areas of highway on the Eltham Road frontage which are outside our control.</p> <p>We have met with Lewisham officers to progress our evolving proposals and initiate pre-application discussions. We are also consulting with a Working Group of local politicians and interested parties regarding those evolving proposals</p>	<p>Noted, no changes are recommended</p> <p>This is not a representation regarding the SALP schedules of recommended modifications issued for public consultation in Oct / Nov 2012. The comments made are not considered by the Council as applicable to this stage of consultation.</p>	No change	N/A

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				We note that SA22 generally reflects our approach and we hope that the site specific policy will be confirmed and hence continue to be supportive of our proposed regeneration.			
GLA (SMODREP13)	SMODREP13.1	Whole document	Not stated	General support and in conformity with the London Plan. Note: The GLA response also includes a summary of comments from TfL. These comments match those in the separate response received from TfL and officers' responses to these comments are detailed there (See SMODREP5)	Noted – no further changes are recommended	No change	N/A
Thomas Wrenn Homes Ltd (SMODREP14)	SMODREP14.1	Site not included in the submission SALP Honor Oak Road Covered Reservoir	Not stated	I wish to object to the inclusion of our site at Honor Oak Covered Reservoir as a site of nature conservation importance. The Council has produced no evidence to substantiate their claim that it is a site of nature conservation importance and are solely relying on old surveys which are out of date and therefore no longer relevant.	Late representation Noted, no changes are recommended This is not a representation regarding the SALP schedules of recommended modifications issued for public consultation in Oct	No change	N/A

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		SINC (rear of 108 – 120 Canonbie Road and 36 Honor Oak Road, SE23 3RZ)		We also contend that the site is a brownfield site, i.e. previously developed land under current planning guidelines, and we consider this site to be suitable for residential development.	<p>/ Nov 2012. The comments made are not considered by the Council as applicable to this stage of consultation.</p> <p>This is a designated SINC site that was previously put forward as a site for housing development by Thomas Wrenn Homes Ltd. The site was included as Site 23 in the Issues and Options report (SALP2.2) and carried forward as Site 19 in the Preferred Options report (SALP2.3, page 279). The site was rejected as a housing site in the Further Options report (SALP2.5, page 10), and is therefore not included in the Submission Plan (SALP1.1).</p>		

