



Schedule of suggested modifications to
Development Management Local Plan
(Submission version 2013)

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Recommended suggested modifications

Table 1 details the suggested modifications that the Council are recommending to be made to the Submission version of the Development Management Local Plan. The Council consider that modifications are required either as a result of representations made to the Proposed Submission version consultation or to fix errors or omissions in the Proposed Submission version.

The recommended suggested modifications (SMs) 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.

Table 1: Recommended suggested modifications

Ref	Page (in submissi on version)	Policy/ section/ figure	Amendment/recommended modification (deleted text is in struck through ; new text is in bold and underline)	Reason for change	Arising from
SM1	34	DM Policy 10 (1).	Local Employment Locations (LEL) 1. The Council will support uses within the B Use Class and appropriate sui generis uses , within a Local Employment Location, subject to: a. the use being appropriate in the location in relation to the surrounding built context b. the intensity of the use and c. the new use meeting the aims in the Core Strategy Policy 3.	To provide clarity to the policy, to ensure the policy is in line with Core Strategy Policy 3 Strategic Industrial Locations and Local Employment Locations, which states that 'The Council will protect the LELs for a range of uses within the B Uses Classes (B1, B8 and where appropriate B2 industry) and also appropriate sui generis uses, to support the functioning of the local economy'. This change is proposed in light of RPS's representation DMREP5.1 and GLA/TfL's representation DMREP11.8.	RPS: DMREP5.1 and GLA/TfL's: DMREP11.8
SM2	94	DM Policy 32 (1)	Siting and layout of development 1. The Council expects all new residential development to be attractive, to be neighbourly and to meet the functional requirements of its future inhabitants. The siting and layout of new-build housing development, including the housing element of mixed use developments, will need to respond	To ensure new residential developments have an acceptable impact on neighbouring occupiers, and are fit for purpose. This change is proposed in light of Louise Venn's representation DMREP6.1.	Louise Venn: DMREP6.1

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			positively to the site specific constraints and opportunities as well as to the existing and emerging context for the site and surrounding area.		
SM3	99	DM Policy 33 (5)(c)	c. result in no significant overshadowing or overlooking, and no loss of security <u>or amenity</u> to adjacent houses and gardens	Drafting error resulted in the word “amenity” being omitted from the submission version. This change is proposed in light of Louise Venn’s representation DMREP6.11.	Louise Venn: DMREP6.11
SM4	34	DM Policy 10	Local Employment Locations (LEL) 1. The Council will support uses within the B use Class and appropriate sui generis uses , within a Local Employment Location, subject to:	To conform with Core Strategy Policy 3. This change is proposed in light of the GLA’s representation DMREP11.8.	GLA: DMREP11.8
SM5	57	DM Policy 19	g. refuse permission for advertisements, banners, blinds, canopies and awnings that are considered to adversely affect the amenity and character of an area or adversely impact on highway safety and operations, including adverse impacts on pedestrians, cyclists and public transport operations.	To provide clarity in line with the original intention of the policy. This change is proposed in light of the GLA’s / TfL’s representation DMREP11.9.	GLA / TfL DMREP11.9

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SM6	81	Paragraph 2.227	2.227 DM Policy 29 supports the implementation of Core Strategy Strategic Objective 9 and Core Strategy Policy 14 (CSP14), which state that 'a managed and restrained approach to car parking provision will be adopted to contribute to the objectives of traffic reduction'. The policy also supports the NPPF (paragraph 39) and the parking standards identified in London Plan Policy 6.13 <u>and Table 6.2 (replicated in Appendix 8).</u>	To aid the reader in finding the relevant standards. This change is proposed in light of the GLA's / TfL's representation DMREP11.10.	GLA / TfL: DMREP11.10		
SM7	After page 156	New appendix: Appendix 8: Parking Standards	<u>Appendix 8 London Plan Car parking standards</u> <u>London Plan Car parking standards (table 6.2 in the London Plan July 2011).</u> <i>Please see table below.</i>	To aid the reader in finding the relevant standards. This change is proposed in light of the GLA's representation DMREP11.10.	GLA: DMREP11.10		
			<u>Designated Blue Badge parking bays recommended in BS 8300:2009</u>				
		<u>Building Type</u>	<u>Provision from the outset</u>	<u>Future provision</u>			
			<u>number of spaces* for each employee who is a disabled motorist</u>	<u>number of spaces* for visiting disabled motorists</u>	<u>number of enlarged standard spaces**</u>		
		<u>workplaces</u>	<u>one space</u>	<u>5% of the total capacity</u>	<u>a further 5% of the total capacity</u>		
		<u>shopping, recreation and leisure facilities</u>	<u>one space</u>	<u>6% of the total capacity</u>	<u>a further 4% of the total capacity</u>		
		<u>railway buildings</u>	<u>one space</u>	<u>5% of the total</u>	<u>a further 5% of the total</u>		

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			<p>capacity <u>capacity</u></p> <p>religious buildings and crematoria <u>two spaces or 6% whichever is the greater.</u></p> <p>sports facilities <u>determined according to the usage of the sports facility***</u></p> <p>* <u>Parking spaces designated for use by disabled people should be 2.4m wide by 4.8m long with a zone 1.2m wide provided between designated spaces and at the rear outside the traffic zone, to enable a disabled driver or passenger to get in or out of a vehicle and access the boot safely.</u></p> <p>** <u>Enlarged standard spaces 3.6m wide by 6m long that can be adapted to be parking spaces designated for use by disabled people to reflect changes in local population needs and allow for flexibility of provision in the future.</u></p> <p>*** <u>Further detailed guidance on parking provision for sports facilities can be found in the Sport England publication Accessible Sports Facilities 2010.</u></p>		
SM8	81	DM Policy 29	<p>5. All new developments will need to ensure that at least 20% of parking bays have an electric charging point installed. <u>All new development will need to ensure that an appropriate number of parking bays have an electric charging point installed and the appropriate level of passive provision, in line with London Plan Table 6.2 Parking Standards (replicated in Appendix 8).</u> Further, all accessible points must meet the Source London criteria so that they can become part of the London-wide network.</p>	<p>To ensure the policy is in line with the parking requirements set out in the London Plan. The original wording did excluded passive provisions, whereas the proposed wording clearly signposts the reader to the correct information.</p> <p>This change is proposed in light of the GLA's / TfL's representation DMREP11.12.</p>	GLA / TfL DMREP11.12

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SM9	95	DM Policy 32	e. Studio flats (one person dwellings at GIA 37 sq. m.) Single person dwellings will not be supported other than in exceptional circumstances. Developments will be required to have an exceptional design quality and be in highly accessible locations in the major and district town centres	In light of Barton Willmore's (for Berkeley Homes) representation DMREP12.4, it is considered that part (e) of the policy needs clarification. The proposed policy intends to only allow single person dwellings (i.e. "1p" dwelling type by table 2.3 in the submitted plan and table 3.3 in the London Plan) where they are of an exceptional design quality and where they are in highly accessible locations. The reference to "studio" flats has been removed, as this is outdated terminology which is not found in the London Plan.	Barton Willmore: DMREP12.4
SM10	95/96	Paragraph 2.257 – final two sentences	Small studio flats Dwellings intended for single person occupation (" 1p " in table 2.3) are not considered to provide long term, sustainable solutions to housing need. In the exception cases when they are provided they will need to be in places that are not isolated and provide very good access to public transport and other amenities.	This change is in conjunction with the proposed alteration to policy 32 / SM9 (see directly above).	Barton Willmore: DMREP12.4
SM11	40	Policy 12	e. provides an adequate level of car parking depending upon the location and the accessibility of the hotel, with lower levels of car parking expected within town centres and in areas where there is good public transport accessibility. and There is a preference for car free development wherever possible	To provide clarity to a sentence that was considered to be overly long and unclear. This change is proposed in light of the Blackheath Society's representation DMREP14.2.	Blackheath Society: DMREP14.2
SM12	101	Paragraph 2.268	2.268 New development on these sites should ensure that existing pedestrian connections with the rest of the neighbourhood, whether formal or informal, are be retained in order to ensure	To increase the clarity of the paragraph in line with the original intention of the paragraph. This change is proposed in light of Louise Venn's	Louise Venn: DMREP6.14

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			<p>permeability and the integration of the new development. Gated sites are considered to be less secure due to the reduction of natural surveillance available to the site, and harms the integration, permeability and cohesiveness of neighbourhoods. <u>Security should be maintained through design, and gated developments will not be considered acceptable.</u> New developments on these sites should also not result in a loss of security to adjacent dwellings.</p>	<p>representation DMREP6.14.</p>	
SM13	101	Paragraph 2.267	<p>2.267 Good access to development on backland sites is a key issue and will be an important factor when considering development applications. Emergency vehicles, refuse vehicles and delivery services need appropriate access. Pedestrian access needs to be safe for all users and avoid conflict with vehicles. If safe and convenient access cannot be achieved for all users then developments may will be refused.</p>	<p>To increase the clarity of the paragraph in line with the original intention of the paragraph.</p> <p>This change is proposed in light of Louise Venn's representation DMREP6.14.</p>	Louise Venn: DMREP6.14
SM14	97	Paragraph 2.258	<p>2.258 The minimum floor heights set out in clause 4. b of the policy are a guideline. Dependent on the format and aspect of the</p>	<p>To rectify a drafting error.</p> <p>This change is proposed in light of Louise Venn's</p>	Louise Venn: DMPRE6.16

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			room this standard may need to be achieved in order to achieve adequate amenity and daylighting. Additionally there is a requirement in DM Policies 30 and 33 to replicate the ceiling and floor heights <u>respect the form and proportions</u> of adjacent development where these form part of the character of an area.	representation DMREP6.16.	
SM15	97	Paragraph 2.259	2.259 A dual aspect dwelling is defined as one with openable windows on two external walls, which may be opposite or adjacent around a corner. Single aspect flats are difficult to naturally ventilate and more likely to overheat, an increasing concern for homes in London due to anticipated temperature increases from climate change coupled with the urban heat island effect where London is inherently warmer than its surrounding areas. Single aspect flats will only be permitted where the design is shown to allow adequate daylight and ventilation to all habitable rooms- <u>and direct sunlight to at least one habitable room for part of the day. Living areas and kitchen spaces should preferably receive direct sunlight.</u>	To ensure the paragraph is in line with London Plan Housing SPG Standard 5.5.2. This change is proposed in light of Louise Venn's representation DMREP6.17.	Louise Venn: DMREP6.17
SM16	150	Appendix 5:	Noise and Vibration Assessment	To add clarity to the document.	Louise Venn:

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		Glossary	<p>An assessment of noise and vibration that is either existing and may impact upon future development, or that would be caused by new development and could impact upon the existing environment.</p> <p><u>North Facing</u> <u>North facing windows are generally defined as any windows within 45 degrees of due North.</u></p> <p>Open space All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.</p>	<p>This change is proposed in light of Louise Venn's representation DMREP6.20.</p>	DMREP6.20
SM17	30	Paragraph 2.78	<p>2.78 This policy aims to ensure student housing is provided in the most appropriate and accessible locations and has due consideration to surrounding land uses. The need for student housing is associated with the provision of higher and further education institutions both within and adjoining the borough <u>and across London.</u> Lewisham is the location of Goldsmiths College (University of London) at New Cross, Trinity Laban Conservatoire of</p>	<p>To ensure the policy justification is in line with the requirements of the London Plan.</p> <p>This change is proposed in light of the GLA's representation DMREP11.2.</p>	GLA: DMREP11.2.

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			Music and Dance at Deptford and Lewisham College with campuses at Deptford Bridge and Lewisham Way. There are also several campuses of Greenwich University in the Royal Borough of Greenwich and Lewisham is within easy reach of central London universities and colleges.		
SM18	123	2.330	2.330 The Core Strategy sets out the strategic context for art, cultural and entertainment facilities in Strategic Objective 11 (see Appendix 1) and Policy 19 which states that the Council will work with its partners to protect and enhance art, culture and entertainment facilities. Examples of such facilities in the borough include the Catford Broadway, Albany and Brockley Jack Theatres, Rivoli Ballroom, Laban Dance Studios, various galleries and showrooms and neighbourhood initiatives such as those around Deptford / New Cross. <u>The Broadway Theatre, Catford; The Albany, Deptford; The Brockley Jack, Brockley; The Rivoli Ballroom, Crofton Park; The Trinity Laban Faculty of Dance, Creekside, and various galleries in Creekside .</u>	To give clarity regarding the formal names and locations of the named facilities.	LBL
SM19	106	After paragraph 2.285	<u>2.286 The Lewisham Public Arts Strategic sets out how public art can help to build a sense of place and identity through iconic landmarks and social engagement, strengthening community cohesion and ambition for the future. The Council will encourage the provision of public art that is of a high quality and of value to the</u>	To provide justification for Policy 35 Public Realm subsection (1) on page 105.	LBL

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			<u>community. Public art which forms part of a new development should be integrated into the design of the development an early stage, and should not added on to existing designs as an afterthought.</u>		
SM20	142	Appendix 4: Lewisham UDP policies superceeded policies	Appendix 4: Lewisham UDP policies superceeded <u>superseded</u> policies	To correct spelling error.	LBL
SM21	5	Paragraph 1.14	1.14 The DMLP is one of a number of adopted and emerging Lewisham Local Plans, listed below, which together will guide future development of the borough: and includes	To correct a typographic error.	LBL
SM22	11	2.21	2.21 The Core Strategy sets out a Regeneration and Growth Area for Lewisham, Catford, New Cross and Deptford that promotes development on a number of large strategic sites. Developers of these sites will need to consider the way the new development on these sites will interact in order to achieve the coherence, create new and stimulating developments that contribute to a sense of community, and create new urban quarters.....	To correct a typographic error.	LBL

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SM23	84	DM Policy 30 (h)	h. how the development at ground floor level will provide activity and visual interest for the public including to the pedestrian environment, and provide passive surveillance with the incorporation of doors and windows to provide physical and visual links between buildings and the public domain	To correct a typographic error.	LBL
SM24	96	Paragraph 2.256	2.256 High density new development in the form of purpose built flats proposed in the Core Strategy means that in order to be livable, a reasonable amount of usable external space needs to be provided. This may mean that amenity space is provided in the form of balconies and roof terraces rather than in the form of gardens. Balconies and terraces should be large enough to be usable as an amenity space and should have a minimum width of 1500mm. Roof terraces and gardens should be designed with the security of the users in mind and also achieve a sense of enclosure. This form of external space may give rise to problems of privacy and overlooking in traditional street layouts and are more suited to dense urban areas where balconies and terraces are a more typical form of development. Family houses should be provided with their own private garden area of a size appropriate the the design and configuration of the housing site, the size of the houses and their intended occupancy. The Council will apply the standards of the London Plan Supplementary Planning Guidance,	To correct a typographic error.	LBL

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			'Providing for Children and Young People's Play and Informal Recreation', which specifies 10 square metres of playspace for each child.		
SM25	97	Paragraph 2.257	2.257 Flexible and adaptable housing design reduces the need to move from home to home and allows for the sustainable development of communities. Larger room sizes can be used more flexibly as they are generally more adaptable. The South East London Housing Partnership Wheelchair Homes Design Guidelines comply with (and generally exceed) Part M of the Building Regulations, British Standard 8300, Lifetime Homes, the Housing Corporation 'Design and Quality Standards/Stephen Thorpe's 'Wheelchair Housing Design Guide' and the Mayor of London's Wheelchair Accessible Housing Guide. The adoption of the space standards for housing in this policy has been tested and adopted by the London Plan. Small studio flats intended for single person occupation are not considered to provide long term, sustainable solutions to housing need. In the <u>exceptional</u> cases when they are provided they will need to be in places that are not isolated and provide very good access to public transport and other amenities.	To correct a typographic error.	LBL

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SM26	101	Paragraph 2.268	2.268 New development on these sites should ensure that existing pedestrian connections with the rest of the neighbourhood, whether formal or informal, are be retained in order to ensure permeability and the integration of the new development. Gated sites are considered to be less secure due to the reduction of natural surveillance available to the site, and harms the integration, permeability and cohesiveness of neighbourhoods. New developments on these sites should also not result in a loss of security to adjacent dwellings.	To correct a typographic error.	LBL
SM27	Entire document	N/A	<i>Remove references to "proposed submission" on footer of every page, and from title on p1</i>	To reflect the status of the finalised document.	LBL
SM28	57	Policy 19(2)	2. The Council will not grant consent for the display of poster hoardings. <u>The Council will not grant consent for the display of poster hoardings which are considered to be out of scale and character with the building/site on which they are displayed and where they would harm visual or aural amenity or public safety.</u> Temporary hoardings may be suitable for some form of public art.	The change in wording has been proposed to address Chris Thomas' concerns raised in representation DMREP1.1.	Chris Thomas: DMREP1.1

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SM29	20	Paragraph 2.43	Smaller houses <u>dwellings</u> with fewer than three bedrooms should also be retained in order to provide housing choice	To increase the clarity of wording in response to Green Tea Architects' representation DMREP2.1 and Rhys Cannon's representation DMREP7.2.	Green Tea Architects: DMREP2.1 and Rhys Cannon: DMREP7.2
SM30	20	Policy 3(2)(a)	Any house <u>dwelling</u> considered suitable for conversion according to point 1 of this policy will need to have a net internal floor space greater than 130sq.m	To increase the clarity of wording in response to Green Tea Architects' representation DMREP2.1 and Rhys Cannon's representation DMREP7.2	Green Tea Architects: DMREP2.1 and Rhys Cannon: DMREP7.2
SM31	36	Paragraph 2.102	2.102 Extensive marketing evidence that a business use is no longer viable on a site or building that meets the criteria in clause 1 of the policy option will be required. The London Plan SPG 'Land for Industry and Transport' (September 2012) considers that the time period for Development Management Proposed Submission Consultation August 2013 37 Development management policies 2 this should normally be for at least two years and up to five years in areas of strong demand for particular types of premises. The Council supports this approach. <u>A shorter timescale (up to 1 year) may be appropriate for B1 (a) centres where demand for premises may be higher.</u>	The change in wording has been proposed to address GL Hearn's concerns raised in representations DMREP4.1, 4.2, and 4.3.	GL Hearn: DMREP4.1, 4.2, and 4.3

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SM32	81	Policy 29(2)(a)	2. Car limited major residential development will only be considered where there is: a. PTAL level of good four or higher, or where this can be achieved through investment in transport infrastructure and services	To increase clarity of the policy in response to Barton Willmore's representation DMREP12.3.	Barton Willmore: DMREP12.3
SM33	57	Policy 19(1)	<i>Add additional criteria:</i> <u>j. Where applications require a new shop front in addition to new residential units an appropriate level of fit out will be sought.</u>	The change in wording has been proposed to address Mr Michael Abraham's concerns raised in representation DMREP16.1.	Mr Michael Abraham: DMREP16.1
SM34	11	New paragraph after paragraph 2.15, before sub-heading 4. Building a Sustainable Community.	<u>Water supply and sewerage infrastructure Applicants will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for applicants to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure. Drainage on the site should maintain the separation of foul water and surface flows. Applicants are advised to contact Thames Water to discuss the infrastructure necessary to serve the development on 0845 850277, as part of the pre-application process.'</u>	The change in wording has been proposed to address Thames Water's concerns raised in representation DMREP18.1.	Thames Water: DMREP18.1