

Mayor's Office

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Our ref: PDU/LDF23/
LDD01/GR03
Your ref: LDF/18/CON
Date: 31 March 2010

Dear Mr Regan,

Lewisham Council Local Development Framework: Submission of the Core Strategy

Statement of general conformity with the London Plan (Planning and Compulsory Act 2004, Section 24 (4) a)

Thank you for your letter of 18 February 2010, consulting the Mayor on the above document.

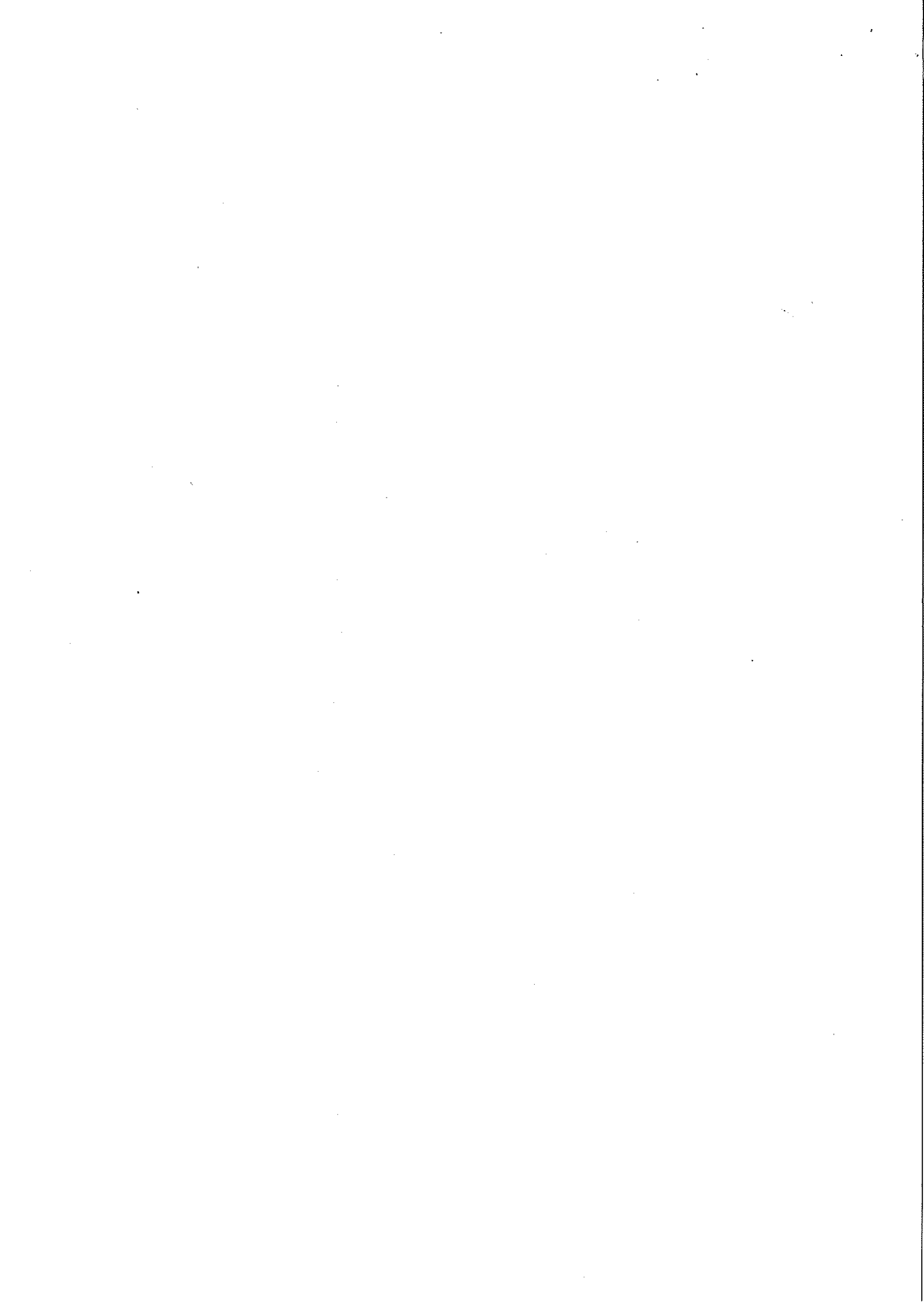
As you will be aware, all development plan documents must be in general conformity with the London Plan under section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004.

On 31 March 2010, I considered a report on this matter, reference PDU/LDF23/LDD01/02.

It is my opinion that the policies throughout the Core Strategy Proposed Submission are consistent with the London Plan. There are, however, some issues that I would like to point out to you, which while not raising issues that affect the general conformance of the Core Strategy with the London Plan, could have an effect on the implementation of the plan. In addition, there are a number of areas where the clarity and robustness of the Core Strategy could be improved.

Specifically, I would like to draw your attention to the following matters:

1. The draft replacement London Plan provides updated data to the information within the Core Strategy, specifically in terms of housing provision and tenure mix. However I note that there are provisions within the wording for these figures to be updated. There should be no net loss of housing.
2. Although there are no general objections to the designation of mixed-use areas, however I have provided comments regarding the maximisation of employment potential across the



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sites, and my concerns regarding the accessibility and proposed density and quality of residential accommodation on these sites.

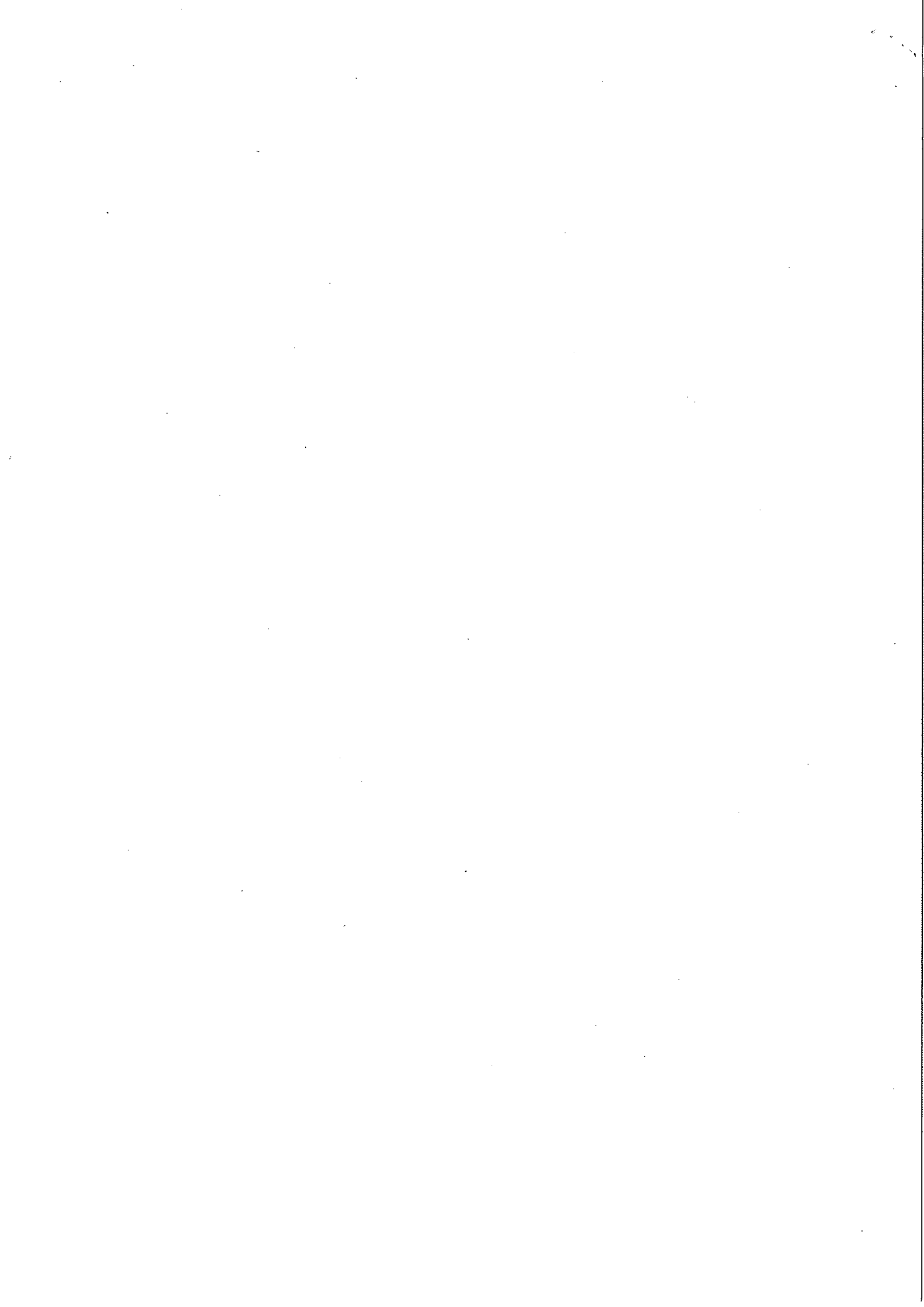
If you would like to discuss any of my representations in more detail, please contact Glen Rollings (020 7983 4315, glen.rollings@london.gov.uk) who will be happy to discuss and arrange a meeting.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Boris Johnson', with a long horizontal flourish extending to the right.

Boris Johnson
Mayor of London

cc Len Duvall, London Assembly Constituency Member
Jenny Jones, Chair of London Assembly Planning and Housing Committee
John Pierce and Ian McNally, GoL
Colin Lovell, TfL



Consultation on Submission Documents

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Planning and Compulsory Purchase Act 2004 (as amended); Town and Country Planning (Local Development) (England) Regulations 2004 (as amended).

Strategic issues

Loss of strategic industrial land, mixed-use development, housing and affordable housing, climate change, urban design and tall buildings, and transport.

Recommendation

That the Mayor agrees to submit the comments set out in this report to Lewisham Council as the formal response to the pre-submission consultation, and that Lewisham Council be advised that the pre-submission documents **are in general conformity** with the London Plan, subject to minor changes.

Context

1. On 18 February 2010, Lewisham Council consulted the Mayor of London on the above documents. This report sets out information for the Mayor's use in deciding what comments to make. The consultation period expires on 6 April 2010.
2. The Planning and Compulsory Purchase Act 2004 ("the Act") introduced a new system of preparing development plans. This requires boroughs to progressively replace existing unitary development plans with a portfolio of local development documents that will collectively form the local development framework for each of the boroughs. The local development framework together with the London Plan provides the essential framework for planning at the borough level. The "development plan" in London for the purposes of section 38(6) of the Act is:
 - The London Plan (consolidated with alterations since 2004), and
 - Development plan documents produced by the borough councils (and saved unitary development plan policies in transitional period).
3. There are three types of local development documents: development plan documents; supplementary planning documents; and statements of community involvement. The documents now being consulted on are development plan documents with development plan status, which will be subject to an examination to test their 'soundness'.
4. Planning Policy Statement 12 (*'Creating strong, safe and prosperous communities through Local Spatial Planning'*) sets out that to be 'sound' a core strategy and other DPDs should be justified, effective and consistent with national policy. Paragraph 4.50 of PPS 12 sets out that an

Inspector is charged with checking that the plans have complied with legislation, which will include checking that the plans conform generally to the London Plan.

The Mayor's role

5. All development plan documents must be in general conformity with the London Plan, in accordance with Section 24(1)(b) of the Act. It is also a statutory requirement for local planning authorities to request the Mayor's opinion on general conformity at the same time as it submits the documents to the Secretary of State.

6. PPS12 sets out the definition of general conformity: *"The test is of general conformity and not conformity. This means that it is only where an inconsistency or omission in a development plan document would cause significant harm to the implementation of the spatial development strategy, that it should be considered to not be in general conformity. The fact that the development plan document is inconsistent with one or more policies in the spatial development strategy, either directly or through the omission of a policy or proposal, does not, by itself, mean that the document is not in general conformity. Rather the test is how significant the inconsistency is from the point of view of delivery of the spatial development strategy."*

7. The Mayor's General Conformity Guidance Note (July 2006) confirms that the principle of general conformity applies to all policy areas of the London Plan and can apply to a single policy issue. The Guidance Note also confirms that the Mayor will make other comments on development plan documents.

8. An opinion from the Mayor that the plan is not in general conformity does not mean that the plan automatically falls. Rather, the opinion will automatically be treated as a representation to be dealt with at the examination. The Inspector will determine whether he or she supports the opinion and will recommend accordingly. The Planning Inspectorate has stated that the view of the Mayor's opinion *"will be given considerable weight"*¹ and that a lack of general conformity with the London Plan will need to be fully justified on the basis of local circumstances, based on relevant evidence. Under the new development plan system the Inspector's recommendations are binding on the local planning authority, and there is no subsequent modifications stage.

9. Based on experience elsewhere in the country it is likely that, where an opinion that a plan is not in general conformity is made, the Mayor will be expected to be represented in person at the examination. Other representations may be dealt with in person or through further written representations. The examination in the present case is due to be held in the middle of 2010.

10. The Mayor of London's comments will be made available on the GLA website www.london.gov.uk.

Previous representations

11. Representations were made by the previous Mayor at the Preferred Options of the Core Strategy on 1 August 2007 (see report PDU/LDF23/LDD01/01). Since that time, the GLA and the Council have been engaged in negotiations that have resulted in many of the concerns raised within this report being satisfactorily resolved.

¹ Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents (The Planning Inspectorate, 2005), paragraph 1.2.6

Strategic issues

12. The following summarises the GLA's consideration of the key strategic issues raised by the core strategy and development policies documents. GLA officers are happy to discuss the comments further in due course.

Spatial strategy

13. Although the previous Mayor made comments at submission stage, the Core Strategy largely reflects the current policy directions as described within the draft replacement London Plan. There are notable exceptions, such as affordable housing provision figures, although the strategy makes provision for these to be updated upon adoption of the draft replacement London Plan.

14. The growth strategy accords with the London Plan. Growth is proposed within corridors based within Opportunity Areas in Lewisham and Catford town centres, New Cross and Deptford. Appropriate development at other accessible locations, in particular around town centres, is also promoted as well as more limited change elsewhere.

Housing and affordable housing

15. The adopted London Plan sets a target of 9,750 additional homes for the period 2007/8 to 2016/17. This equals an annual monitoring target of 975 homes. The housing trajectory of the Core Strategy indicates that the expected future net additional housing completions would exceed the existing London Plan target. The housing figures are therefore in conformity with the London Plan.

16. The draft replacement London Plan 2009 sets a target for Lewisham of 11,050 dwellings for the period 2011-2021 with an annual monitoring target of 1,105 homes.

17. The core strategy sets a target of 50% affordable housing, based on local needs research within the local housing market assessment. This would be applicable to development of 10 or more homes. There is a proposed tenure split of 70% social rented affordable housing and 30% intermediate housing, which conforms to the present London Plan. The draft replacement London plan, however, sets a target of 60:40, although it notes that this may vary according to local need.

18. The approach to maximising housing capacity within Core Strategy Policy 1 refers to the impact of development on local character and other factors, but does not refer to development densities. The density matrix as set out within the London Plan is one of the tools used to measure whether a site's level of development is appropriate. The policy should refer to the matrix and the design process as factors in determining that best use is made of sites.

19. The core strategy also promotes growth to promote regeneration in areas of deprivation, particularly within the south of the borough in areas such as Bellingham and Downham. The GLA supports this model.

20. The Council notes that gypsy and traveller sites will be identified in the forthcoming site allocations document.

Economic development and industrial sites

21. The GLA welcomes the Council's emphasis on the importance of Catford and Lewisham town centres, which include reference to the range of services that these centres provide. The role of secondary town centres and local centres is also noted.

22. The core strategy proposes the creation of mixed-use employment sites. In several cases these will replace London Plan Strategic Industrial Land (SIL) designations. Although the release of a certain level of SIL is accounted for within the sub regional strategy and the calculations used to inform the draft replacement London Plan, GLA officers have been engaged in long-term negotiations with Lewisham Council to justify the loss. These negotiations have been balanced on the loss of SIL, and the benefits that regeneration of these sites would offer to the deprived northern parts of the borough.

23. Overall, it appears there would be a net industrial land release of about 33ha, (allowing for the stated core strategy level of 20% of floorspace on mixed employment sites being for employment/industry uses) and a reduction of about 7.5ha of SIL (15ha de-designated, plus a new 7.5ha designation at Silwood). If the employment components of mixed employment land sites were all non-industrial, then the industrial land release would rise to just over 40ha. Officers are satisfied with these levels, relative to the borough and sub-regional benchmarks for industrial land release set out in the Industrial Capacity SPG, although the proposals mean that there will be limited scope for further release of industry over the plan period from other sites across the borough. However, this plan-led approach is welcomed.

24. The new mixed employment locations are mostly located on low-grade existing industrial land with poor accessibility or other constraints, such as the proximity of railway viaducts. The GLA recognises the potential of these sites to promote local regeneration, but officers are concerned that these constraints may prevent the development of these sites realising the level of benefits that the Council is expecting, particularly with regard to housing density. For example, the area around Millwall stadium is mentioned as potentially being appropriate for tall buildings, but this has not been assessed for impacts on strategic views and local access. Providing such guidance within the core strategy may promote inappropriate development. While this is not an issue of conformance, strategic applications on these sites will be required to comply with the policies within Lewisham's forthcoming development policies document, as well as the London Plan. Additionally, development proposals within or adjacent to SIL land need to demonstrate that they will not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities.

Other issues

Urban design and tall buildings

25. The Council has identified Lewisham and Catford town centres as locations for tall buildings. These are both within opportunity areas. Other applications for tall buildings would be judged on the merits of the proposals. The Council has been requested to exercise caution when seeking tall buildings elsewhere, such as mixed use employment sites, as these sites have not yet been master planned, and are in some cases in areas of poor accessibility, or are subject to other constraints.

26. Design policies and protection of local character, including built and natural heritage, are generally well executed and are in conformance with the London Plan and the draft replacement London Plan. Individual sites capable of major growth are clearly identified within the specific site policies, although references to the London Plan's approach to density are required to avoid ambiguity within future development proposals.

Climate change

27. The strategy conforms to the London Plan, although more references to decentralised energy networks are requested.

Open space, biodiversity and amenity space

28. References to the Blue Ribbon Network and the status of protected wharves have been requested, in order to recognise their potential (in terms of transport) and ensure that the network's value in other areas is recognised and protected. Likewise, the character of open space and the effect of nearby building on such spaces will need to be recognised within the strategy's policies.

Transport

29. The strategy should encourage a greater level of partnership working with neighbouring boroughs, to co-ordinate traffic modelling. References to the potential review and extension of the Bakerloo Underground line into the borough should be added to the policies. Additionally, general clarifications and corrections are sought on site-specific issues, especially with regard to highway modelling and investment.

Waste

30. The strategy's waste management policies conform to the London Plan. The strategy notes that the borough has excess capacity on waste sites, and that the three existing sites will be retained. Hazardous waste site locations will need to be identified within the strategy.

Legal considerations

31. All local development documents must be in general conformity with the London Plan in accordance with Section 24(1)(b) of the Act. This is a key test of the soundness of plans. The Mayor's representations made at this stage will go forward to the examination in public and must include an opinion regarding general conformity with the London Plan. The test of general conformity is set out in Circular 1/2008 and states that Local Development Documents should not be adopted unless they properly reflect the policies in the Spatial Development Strategy.

Conclusion

32. The document is in general conformity with the London Plan subject to the minor changes and clarifications being made, as set out within the accompanying annex tables. There are also a number of comments and suggestions for improving the core strategy, including omissions, as set out within the report.

for further information, contact Planning Decisions Unit:

Colin Wilson, Senior Manager – Planning Decisions

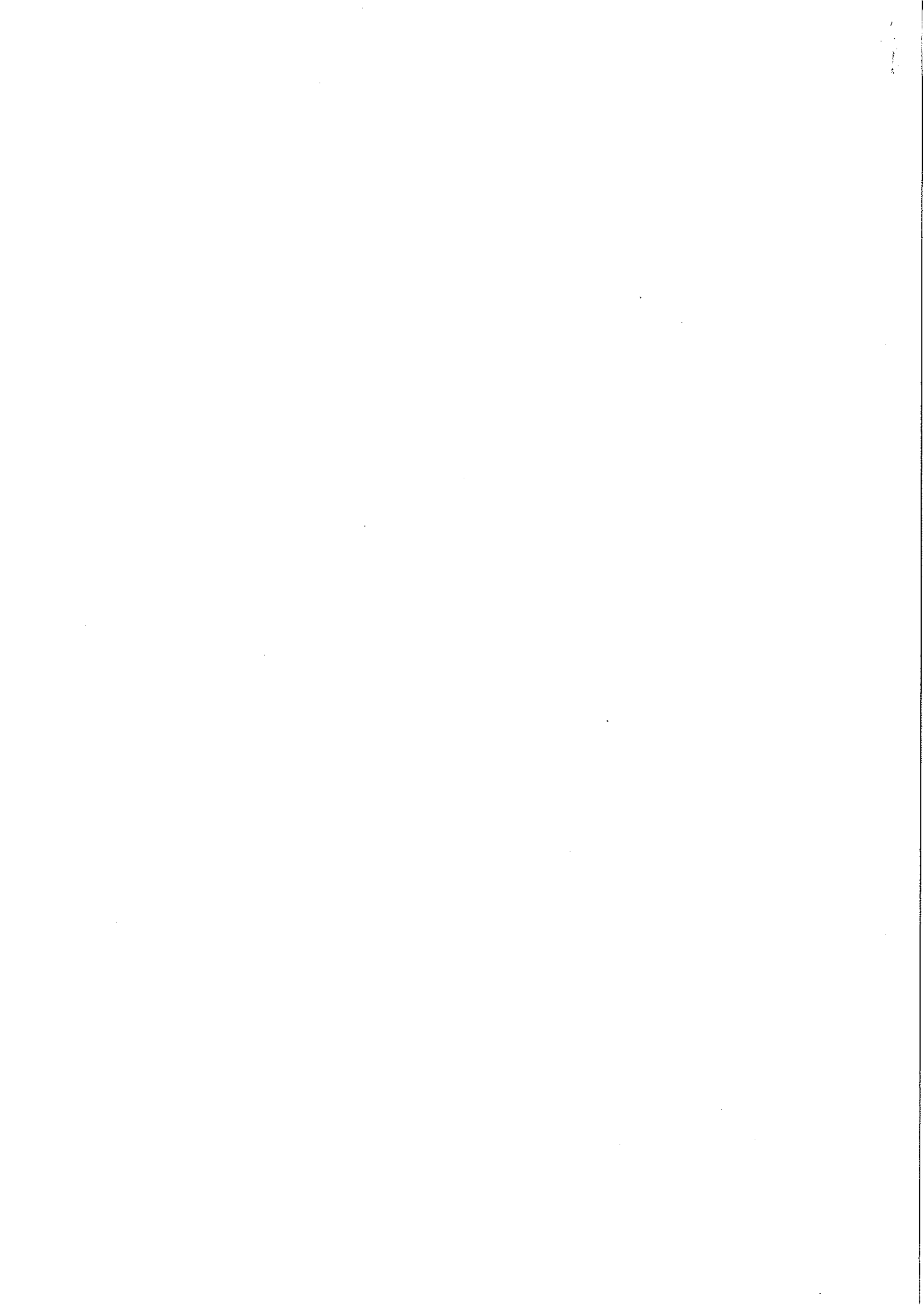
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Christine McGoldrick, Strategic Planning Manager (Development Plans)

020 7983 4309 email christine.mcgoldrick@london.gov.uk

Glen Rollings, Case Officer

020 7983 4315 email glen.rollings@london.gov.uk

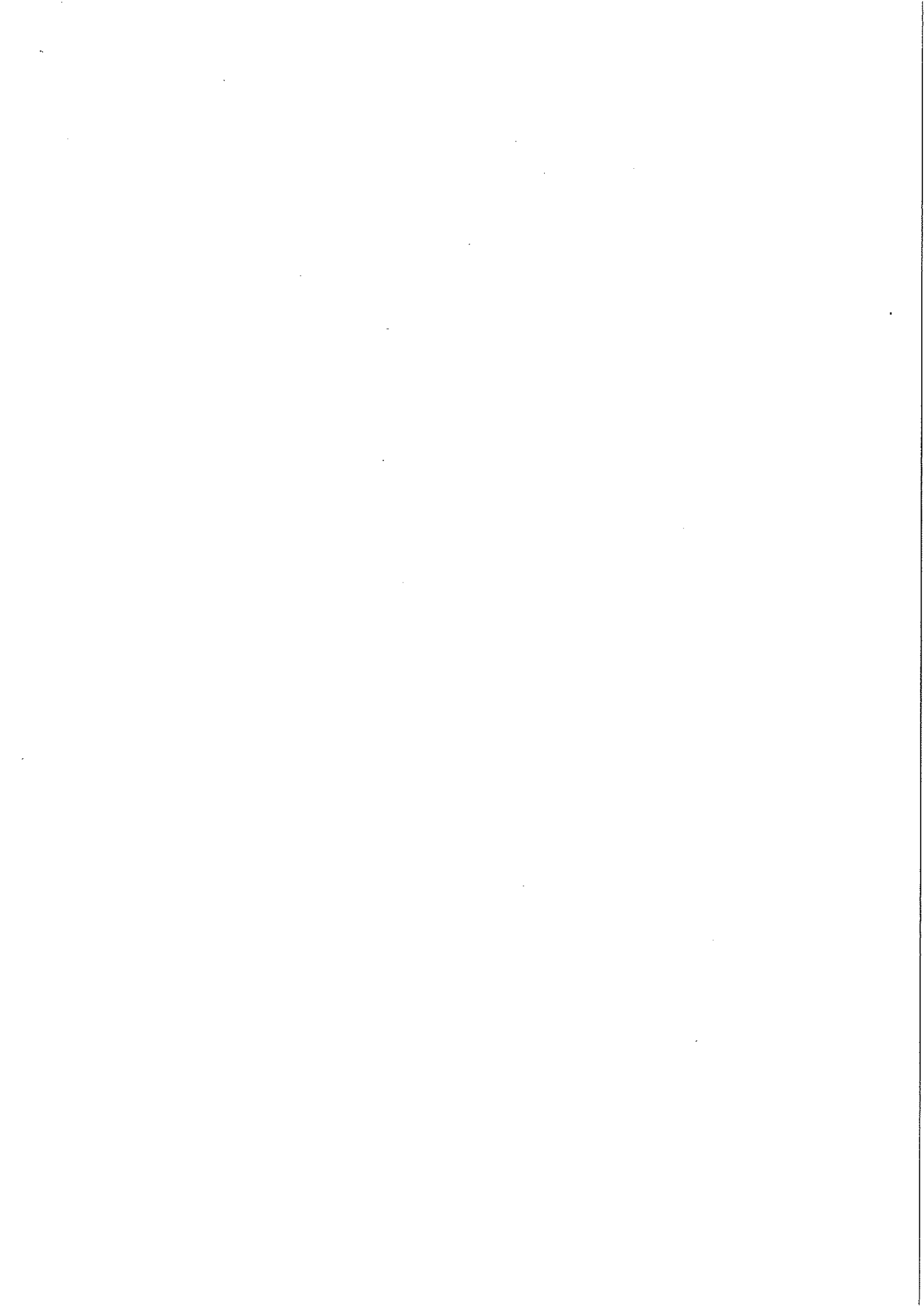


Annex A

Lewisham DPD Core Strategy Submission Consultation (Statutory Consultation period: 19 February 2010 – 6 April 2010)

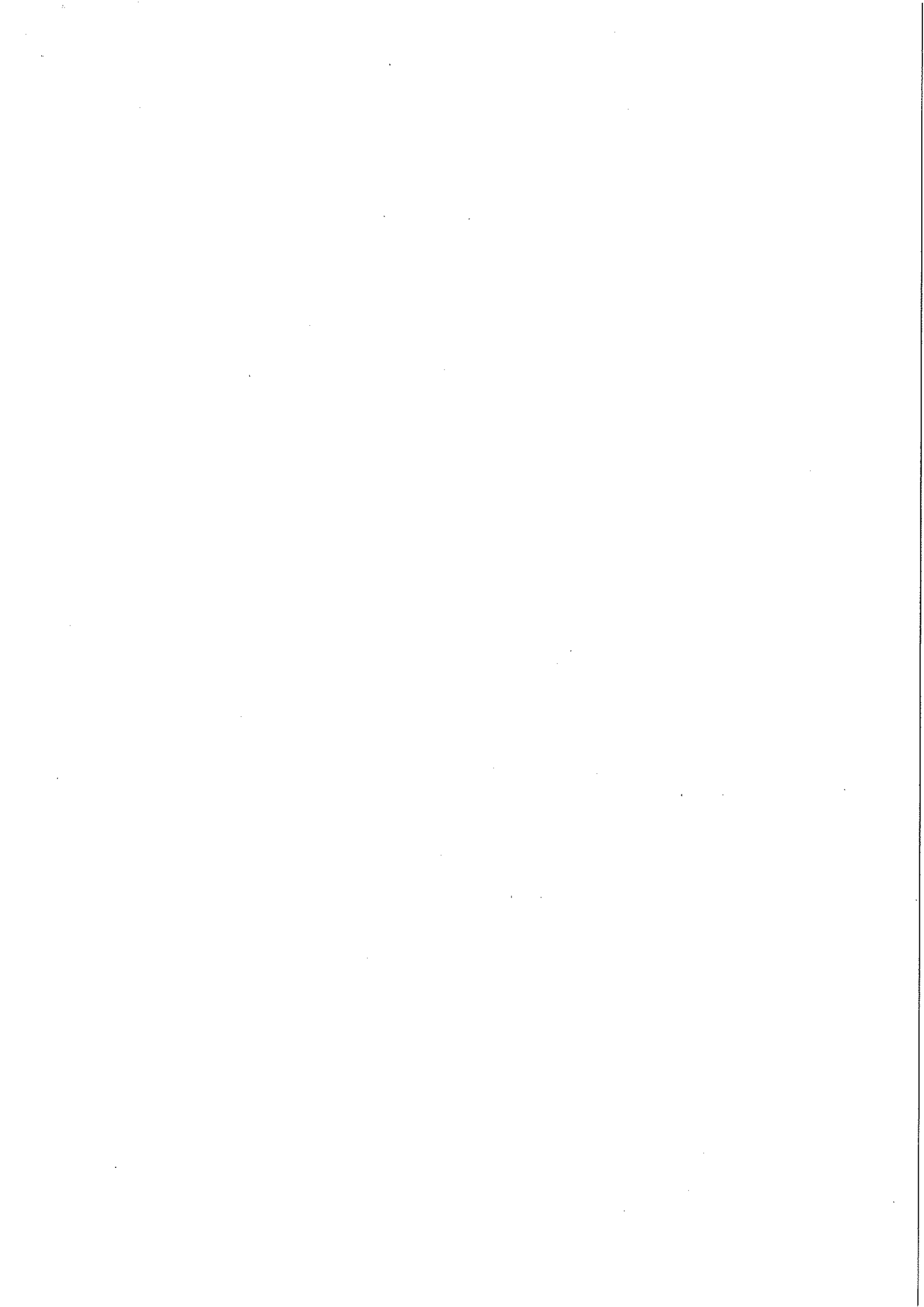
Representations from the Mayor of London

GLA Ref. No.	Which part of the DPD does this submission relate to?	London Plan Policy cross ref.	Representations, including reasons for objection
1.	Paragraph 1.19, table: London Plan requirements for Lewisham	2A.2 Draft replacement London Plan 2.2	The Mayor welcomes the prominence offered to the London Plan and the recognition that the Core Strategy is aiming for general conformity across all aspects of the Core Strategy. The draft replacement London Plan revises the targets and timeframe with regard to housing provision. The table recognises enables core strategy flexibility to substitute revised figures within the Core Strategy upon adoption of the replacement London Plan.
2.	Paragraph 3.7	4A.1, 4A.4, 4A.6 Draft replacement London Plan 5.1, 5.3, 5.5, 5.6	The bullets points should include reference to the Mayor's energy hierarchy and protecting existing and maximising opportunities for creating new communal heating and cooling networks.
3.	Paragraph 3.8	4A.1, 4A.4, 4A.6 Draft replacement London Plan 5.1, 5.3, 5.9	Mitigation measures for adapting to climate change could also include water resources, and reference should be made to overheating. The Sustainable Design and Construction SPG is relevant to this section and could be mentioned.
1	Paragraph 5.11	4A.22, 4A.25, 4A.27 Draft replacement London Plan 5.17	The references to implementing the waste hierarchy and safeguarding the Surrey Canal SIL to meet waste apportionment are supported. Omission: 2020 apportionment is wrongly calculated at 323,000, whereas it is actually 353,000. The Core Strategy needs to show that it is meeting the correct apportionment figure.



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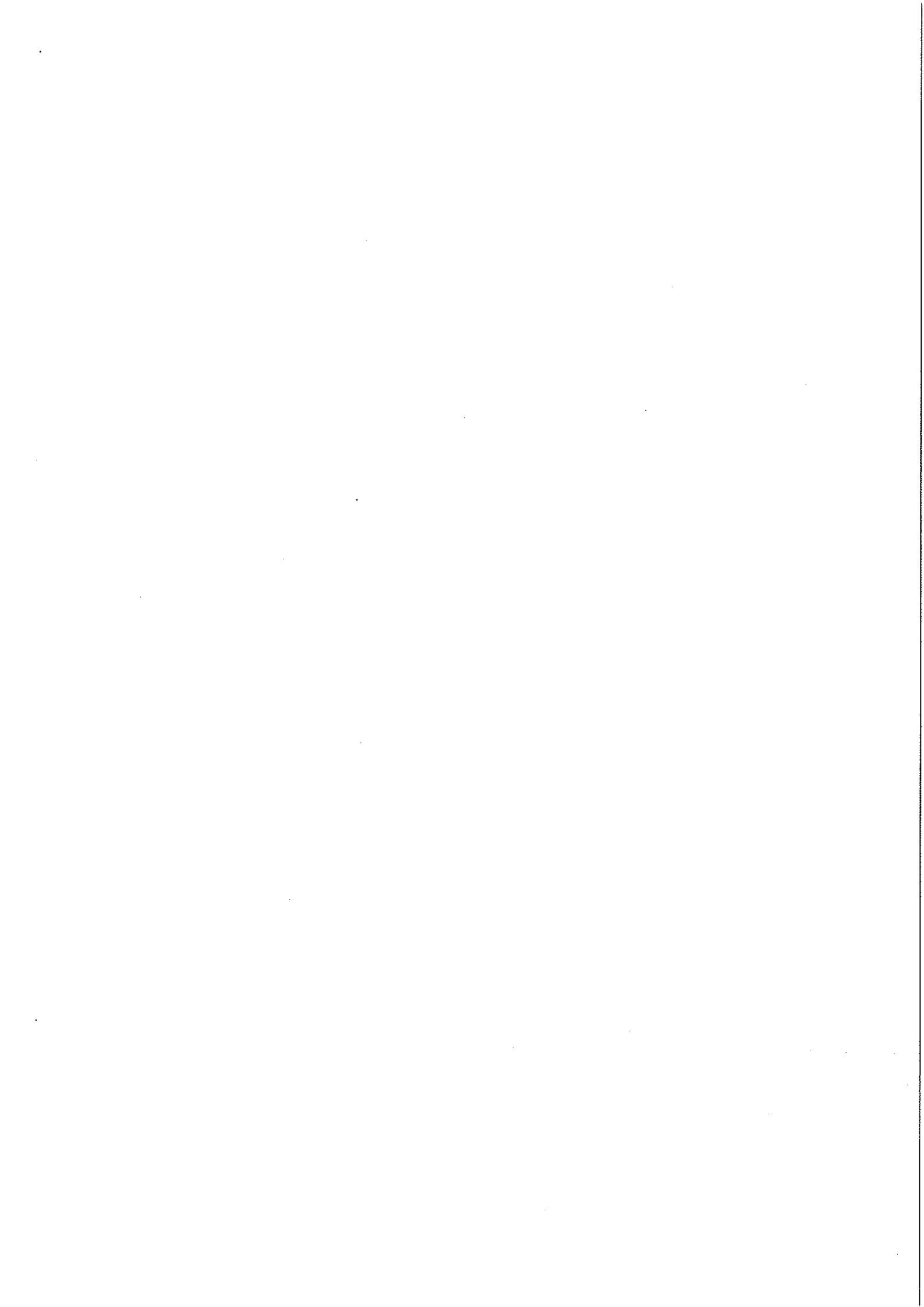
GLA Ref. No.	Which part of the DPD does this submission relate to?	London Plan Policy cross ref.	Representations, including reasons for objection
4.	Spatial Policy 1	2A.5, 2A.6, 2A.7 Draft replacement London Plan 2.13, 2.14, Annex 1	The identification of a major growth corridor to target development is supported. The London Plan and its draft replacement denote the two opportunity areas as 'Deptford Creek/Greenwich Riverside', and 'Lewisham, Catford and New Cross'. The draft core strategy groups New Cross with the former. For clarity, the GLA recommends calculating delivery targets in accordance with the opportunity area designations.
5.	Spatial Policy 2	2A.7, 2A.6, 2A.7, 2A.8 Draft replacement London Plan 2.13, 2.14, 4.7, Annex 1	The identification of regeneration areas in accordance with the London Plan is supported. The planned approach to the development of Lewisham and Catford town centres is supported. The draft replacement London Plan recognises that additional employment development within Catford should be planned rather than speculative. The draft replacement London Plan also recognises the role of Lewisham, Deptford and New Cross centres in contributing to the local night-time economy, which should be noted within this policy. The London Plan and its draft replacement denote the two opportunity areas as 'Deptford Creek/Greenwich Riverside', and 'Lewisham, Catford and New Cross'. The draft core strategy groups New Cross with the former. For clarity, the GLA recommends calculating delivery targets in accordance with the opportunity area designations.
6.	Figure 6.2		The Surrey Canal Road SIL is referred to as the Surrey Canal Triangle elsewhere within the document (for example, in Core Strategy Policy 4). The nomenclature used throughout the document should be standardised to avoid confusion.
7.	Figure 6.3		The area of land south of Stockholm Road but north of Rollins Street should be classified. The GLA presently recognises this land as a Strategic Industrial Location.



Annex A**Lewisham DPD Core Strategy Submission Consultation (Statutory Consultation period: 19 February 2010 – 6 April 2010)**

Representations from the Mayor of London

GLA Ref. No.	Which part of the DPD does this submission relate to?	London Plan Policy cross ref.	Representations, including reasons for objection
8.	Core Strategy para 6.58	4A.22, 4A.25 Draft replacement London Plan 5.17	The reference to Joint Waste Technical Paper, which identifies how Lewisham and the other south-east boroughs will meet their apportionment, is supported.
9.	Spatial Policy 4	2A.8, 3D.2 Draft replacement London Plan 4.7	The general designations of local hubs for smaller levels of growth, and the implementation of approved schemes are supported. The restriction of uses and floorspace at the out-of-centre retail location of Bell Green is supported.
10.	Spatial Policy 5	2A.7 Draft replacement London Plan 2.14	As well as the potential for improvement, the policy should note the potential for growth and managed change within designated Areas for Regeneration within the London Plan and its draft replacement.

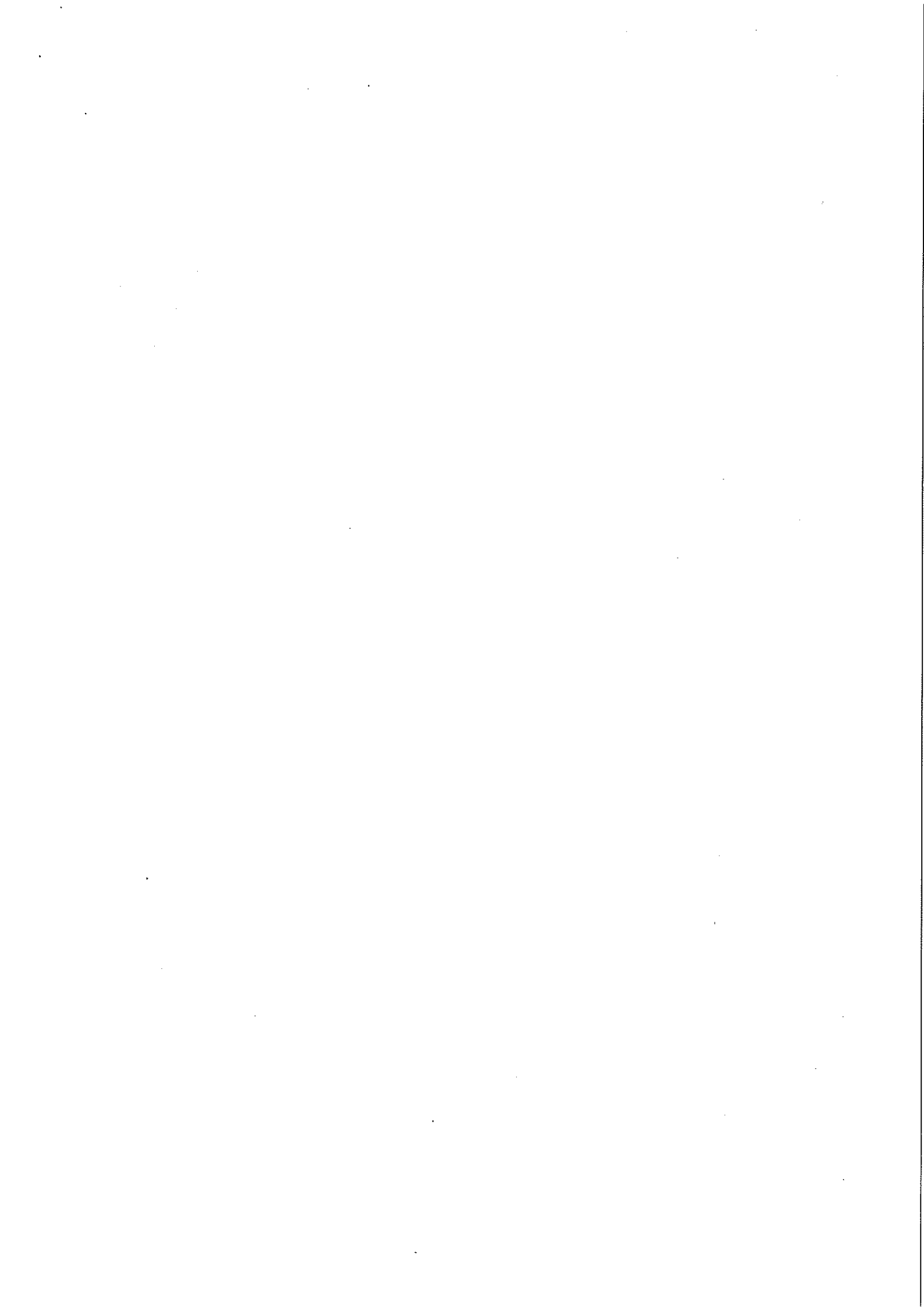


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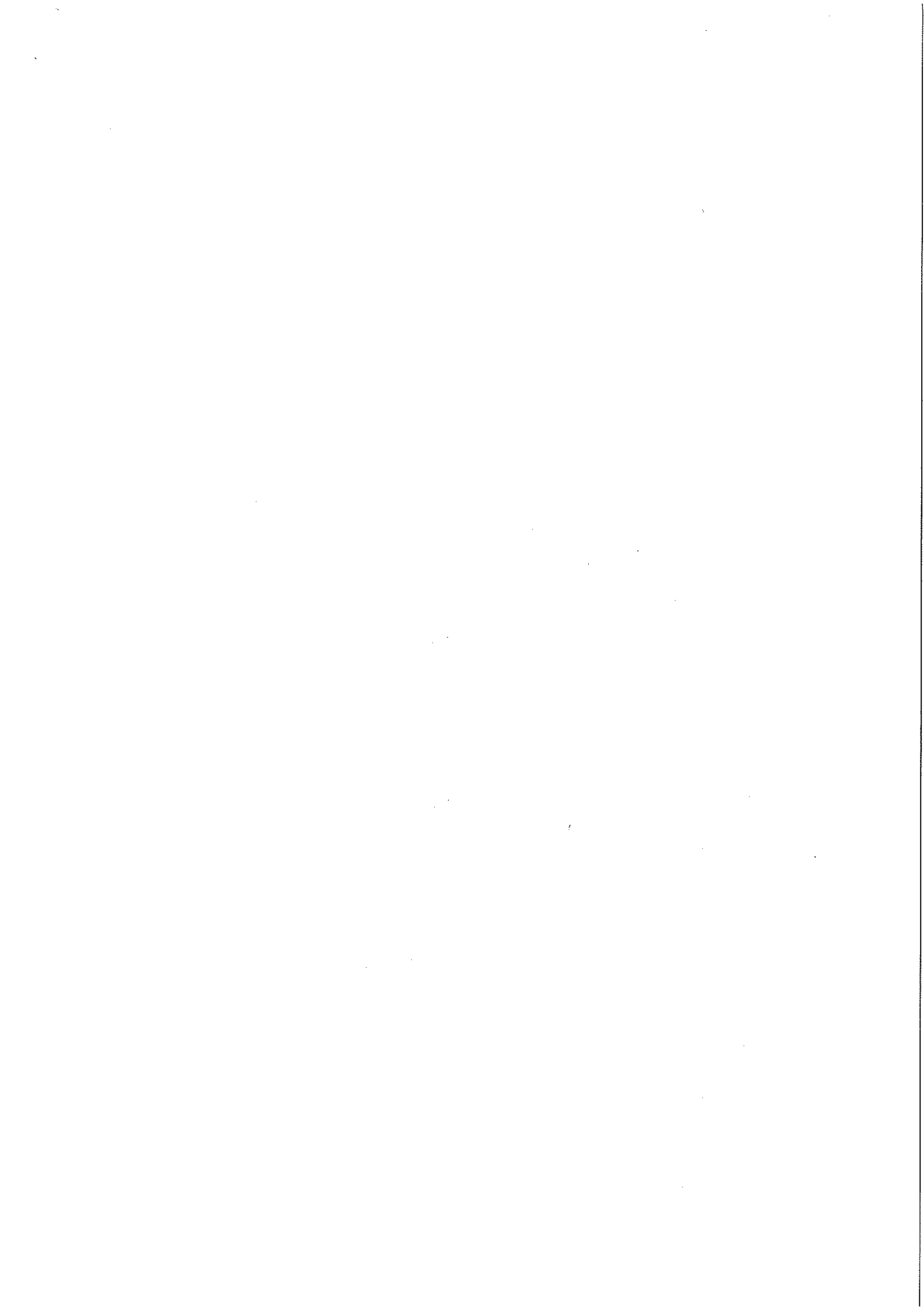
Representations from the Mayor of London

GLA Ref. No.	Which part of the DPD does this submission relate to?	London Plan Policy cross ref.	Representations, including reasons for objection
11.	Core Strategy Policy 1	3A.1, 3A.2, 3A.3, 3A.9, 3A.10, 3.11, 3A.15, table 3A.2 Draft replacement London Plan 3.4, 3.12, 3.13, 3.14, 3.15, Table 3.2	<p>The council's Housing Market Assessment (HMA) notes that local need justifies the proposed 70:30 split in affordable housing tenure between social rented and intermediate housing. This is justified within the London Plan, but the draft replacement London Plan notes that a future split of 60:40 is preferred. However it is recognised that there is a high level of demand for affordable housing in Lewisham, with the HMA stating that 80% of housing needs are for affordable housing. The GLA does not raise the proposed tenure split as a matter of non-conformance, but the policy should note the proposed tenure split within the draft London Plan and provide a degree of flexibility, in the interests of providing mixed and balanced communities.</p> <p>The policy should refer to development densities, as set by the density matrix within the London Plan.</p> <p>The recognition of the need for family accommodation in accordance with local needs, as demonstrated in the HMA, is supported.</p> <p>The policy should mention that development should result in no net loss of housing, in accordance with the London Plan.</p>
12.	Core Strategy Policy 2	3A.14 Draft replacement London Plan 3.9	<p>The future identification of sites and is supported.</p>



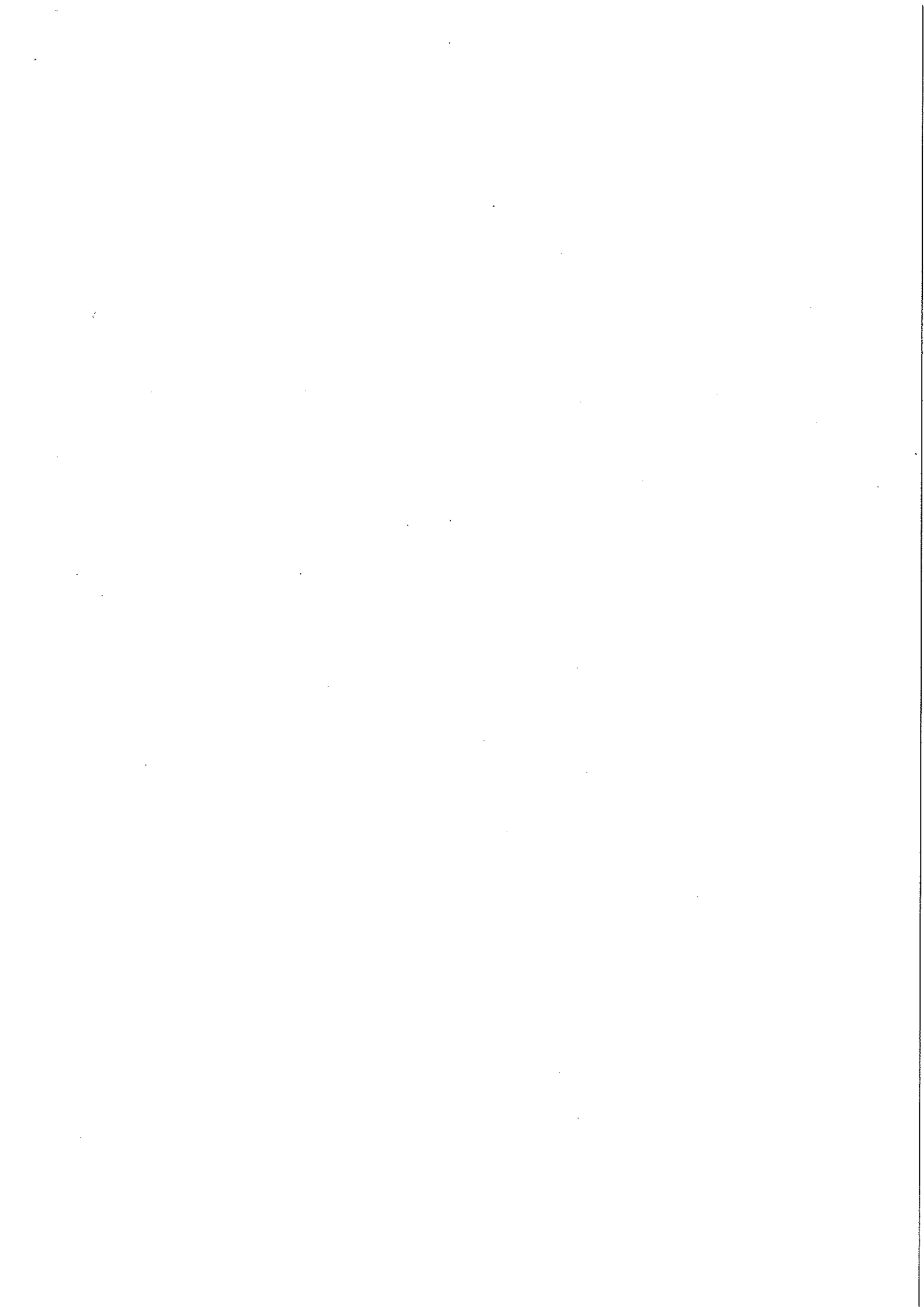
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GLA Ref. No.	Which part of the DPD does this submission relate to?	London Plan Policy cross ref.	Representations, including reasons for objection
13.	Core Strategy Policy 4	2A.10, 3A.3, 3B.4, table 3A.2 Draft replacement London Plan 2.17, 3.4, 4.4, table 3.2	<p>The GLA notes that the mixed-use employment designations replace Strategic Industrial Locations (SIL). While the potential for the redevelopment of these sites to provide regeneration benefits is recognised, the GLA recognises that SILs provide locations for industrial uses that cannot often be housed near residential uses, and that they are valuable sources of employment capacity.</p> <p>The retention of employment capacity in mixed-use employment locations is supported. However, in the interests of maximising employment potential for the sites, the policy should note that applications for development will need to demonstrate that there is no overall loss of employment capacity, and that the proposed employment uses will be appropriate to local need. Additionally, the regeneration benefits for the surrounding areas will need to outweigh the loss of SIL land.</p> <p>While not an issue of conformance, the GLA raises concerns that residential development on these sites will either be affected by employment uses within the sites, or affect retained SIL land outside their boundaries. The policy should require the masterplans to demonstrate that proposals will provide the highest possible level of residential amenity for future residents.</p> <p>References to high-density residential provision should be deleted. The GLA recognises that several of these sites are within areas of poor transport accessibility, and that the residential density of each site should be considered on its own merit according to the local context and the merits of the redevelopment schemes.</p>



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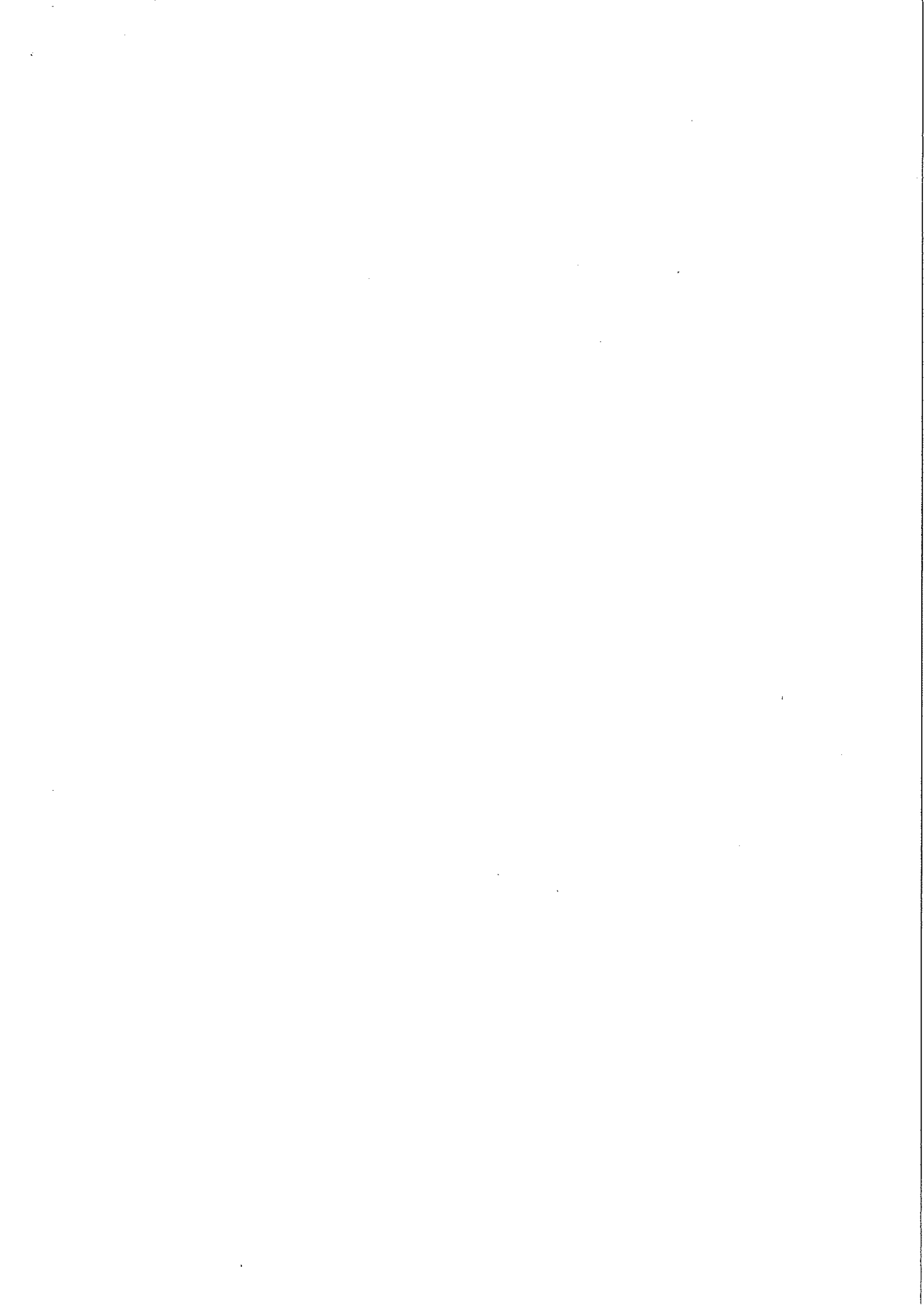
GLA Ref. No.	Which part of the DPD does this submission relate to?	London Plan Policy cross ref.	Representations, including reasons for objection
14.	Core Strategy Policy 7	4A.3, 4A.4, 4A.5, 4A.6, Draft replacement London Plan 5.2, 5.3, 5.5	<p>Bullet 2b should include a reference to the London Plan Energy Hierarchy, which will drive the lean clean and green strategy.</p> <p>Bullet 2c should include a reference to decentralised energy distribution networks.</p> <p>Bullet 3 regarding Code for Sustainable Homes is proposing Level 4 (a 44% improvement on Part L Building Regulations 2006) from 2010 and Level 5 (100% reduction of regulated emissions) from 2012. This is very ambitious and goes beyond the draft replacement London Plan proposals that are Level 4 or 44% improvement on Part L Building Regulations 2006 from 2010 – 2013 and then a 55% improvement on Part L Building Regulations 2006 from 2013-2016. It may be worth reconsidering these targets in light of the proposed targets in the draft replacement London Plan?</p>
15.	Core Strategy Policy 8	4A.3 Draft replacement London Plan 5.3	<p>The requirement for major development to conform with the London Plan is supported. As well as the requirement to conform with the Sustainable Design and Construction Supplementary Planning Guidance, the policy should note the requirement of development to accord with the Mayor's energy hierarchy, as well as the forthcoming Climate Change Mitigation and Energy Strategy.</p>
16.	Core Strategy Policy 11	4C.1, 4C.7, 4C.8, 4C.9, Draft replacement London Plan 7.24, 7.25, 7.26	<p>The policy should refer to the aims and objectives of the Mayor's Blue Ribbon Network, including the potential for transport. Designated safeguarded wharves should be identified within the text, along with measures for their protection.</p>



Annex A**Lewisham DPD Core Strategy Submission Consultation (Statutory Consultation period: 19 February 2010 – 6 April 2010)**

Representations from the Mayor of London

GLA Ref. No.	Which part of the DPD does this submission relate to?	London Plan Policy cross ref.	Representations, including reasons for objection
17.	Core Strategy Policy 12	3A.7, 3D.8, 3D.10 Draft replacement London Plan 7.4, 7.17	The policy should refer to the character of open spaces and the need to protect both character and amenity from within these spaces, both in terms of development within open spaces and the effects of development outside their boundaries.
18.	Core Strategy Policy 13	4A.21, 4A.22, 4A.24, 4A.28 Draft replacement London Plan 5.16, 5.17	References to implementing the waste hierarchy, the safeguarding of existing waste sites and the requirement for new development to integrate recycling facilities are supported. The requirement for new developments of more than 1,000 sq.m to submit and implement a waste management plan and achieve recycling and re-use levels in construction, demolition and excavation waste of 95% is also supported. <u>Omission:</u> 2020 apportionment is wrongly calculated at 323,000, whereas it is actually 353,000. The Core Strategy needs to show that it is meeting the correct apportionment figure.
19.	Paragraph 7.106	4A.25 Draft replacement London Plan 5.17	The reference to the Joint Waste Technical Paper, which identifies how Lewisham and the other south-east boroughs will meet their apportionment, is supported.

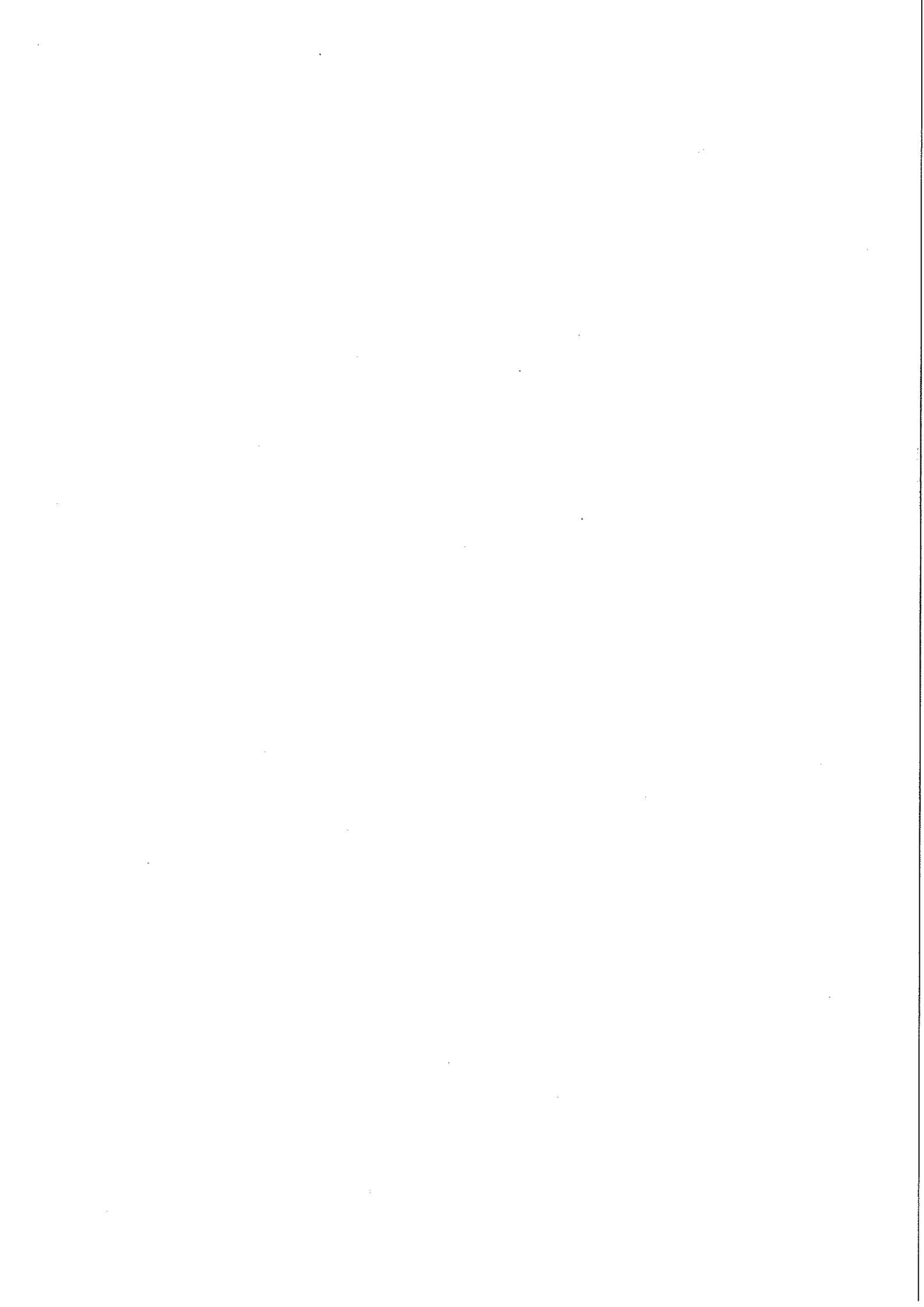


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Representations from the Mayor of London

GLA Ref. No.	Which part of the DPD does this submission relate to?	London Plan Policy cross ref.	Representations, including reasons for objection
20.	Paragraph 7.107	<p>4A.21, 4A.22, 4A.23, 4A.25, 4A.26, 4A.28 4A.29</p> <p>Draft replacement London Plan 5.16, 5.17 5.18, 5.19 5.20, 5.28</p>	<p>The identification of a range of waste management facilities, and of sites and waste tonnages to manage waste apportionment, is supported.</p> <p>Omission: The 2020 apportionment is wrongly calculated at 323,000, whereas it is actually 353,000. The Core Strategy needs to show that it is meeting the correct apportionment figure.</p> <p>Omission: Lewisham needs to set targets by waste stream to exceed recycling or composting levels of municipal waste of 35% by 2010, and 45% by 2015.</p> <p>Omission: Lewisham needs to set targets by waste stream to exceed recycling or composting levels of commercial and industrial waste of 70% by 2020</p> <p>Omission: Lewisham needs to set targets by waste stream to exceed recycling or composting levels of construction, demolition and excavation waste of 95% by 2020</p> <p>Omission: Lewisham needs to make provision for hazardous waste treatment plants to achieve the necessary waste management requirements, and identify suitable sites for the storage, treatment and reprocessing of hazardous waste.</p>
21.	Core Strategy Policy 18	4B.9, 4B.10	<p>Draft replacement London Plan 7.7</p> <p>The GLA supports the identification of locations for tall buildings. The policy should note that in other locations, where individual buildings will be considered on the merits of the scheme, that as well as their impact on character and regeneration, factors of density and accessibility should be considered. The assessment of proposals within the views identified within London View Management Framework should also be mentioned in this policy. This is particularly important in locations such as Surrey Canal Road mixed-use employment area, in which tall buildings are envisaged by the Council, but the case for these is yet to be proven.</p>



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GLA Ref. No.	Which part of the DPD does this submission relate to?	London Plan Policy cross ref.	Representations, including reasons for objection
22.	Strategic Site Allocations	3A.3, table 3A.2 Draft replacement London Plan 3.4, table 3.2	The text of policies for individual sites should note the requirement of the London Plan to ensure that development is built at an appropriate density, with regard to context, accessibility and access to services.
23.	Strategic Site Allocation 1	4A.4 Draft replacement London Plan 5.2	Bullet point 3b: Masterplans should include a bullet on proposed energy solutions
24.	Strategic Site Allocation 3	Policy 4A.23 Draft replacement London Plan 5.5, 5.6	The statement referring to the Surrey Canal Road Triangle Masterplan prioritising opportunities to use SELCHP for district heating is supported. Note however the Core Strategy should state: '...opportunities to use energy generated...' rather than '...opportunities to use power generated.'
25.	Paragraph 9.4		A bullet should be added to the existing list, proposing the identification of environmental infrastructure requirements, especially from an energy, waste, water and flooding perspective, and they can be delivered to support the vision of the Core Strategy and for Lewisham in 2025.
26.	General	4A.1, 4A.2, 4A.4, 4A.6 Draft replacement London Plan 5.1	References to renewable energy should be replaced with references to renewable and low carbon decentralised energy.



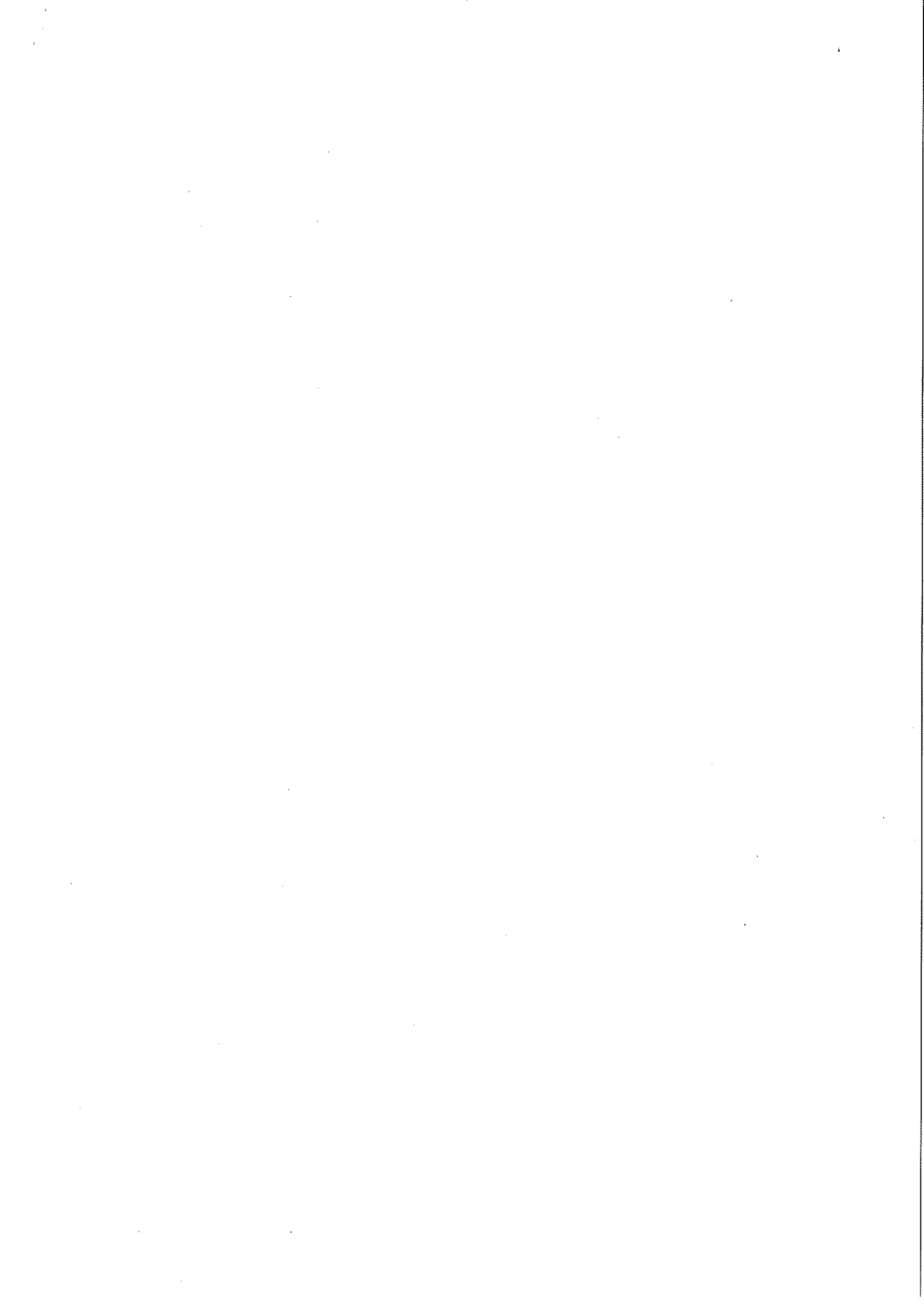
Annex A

Lewisham DPD Core Strategy Submission Consultation (Statutory Consultation period: 19 February 2010 – 6 April 2010)

Representations from the Mayor of London

CLA Ref. No.	Which part of the DPD does this submission relate to?	London Plan Policy cross ref.	Representations, including reasons for objection
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Note: It is anticipated that matters of general conformity will be dealt through appearance at the examination (subject to discussion with the Inspector). Other matters can be dealt with by way of further written representations or appearance as determined by the Inspector.

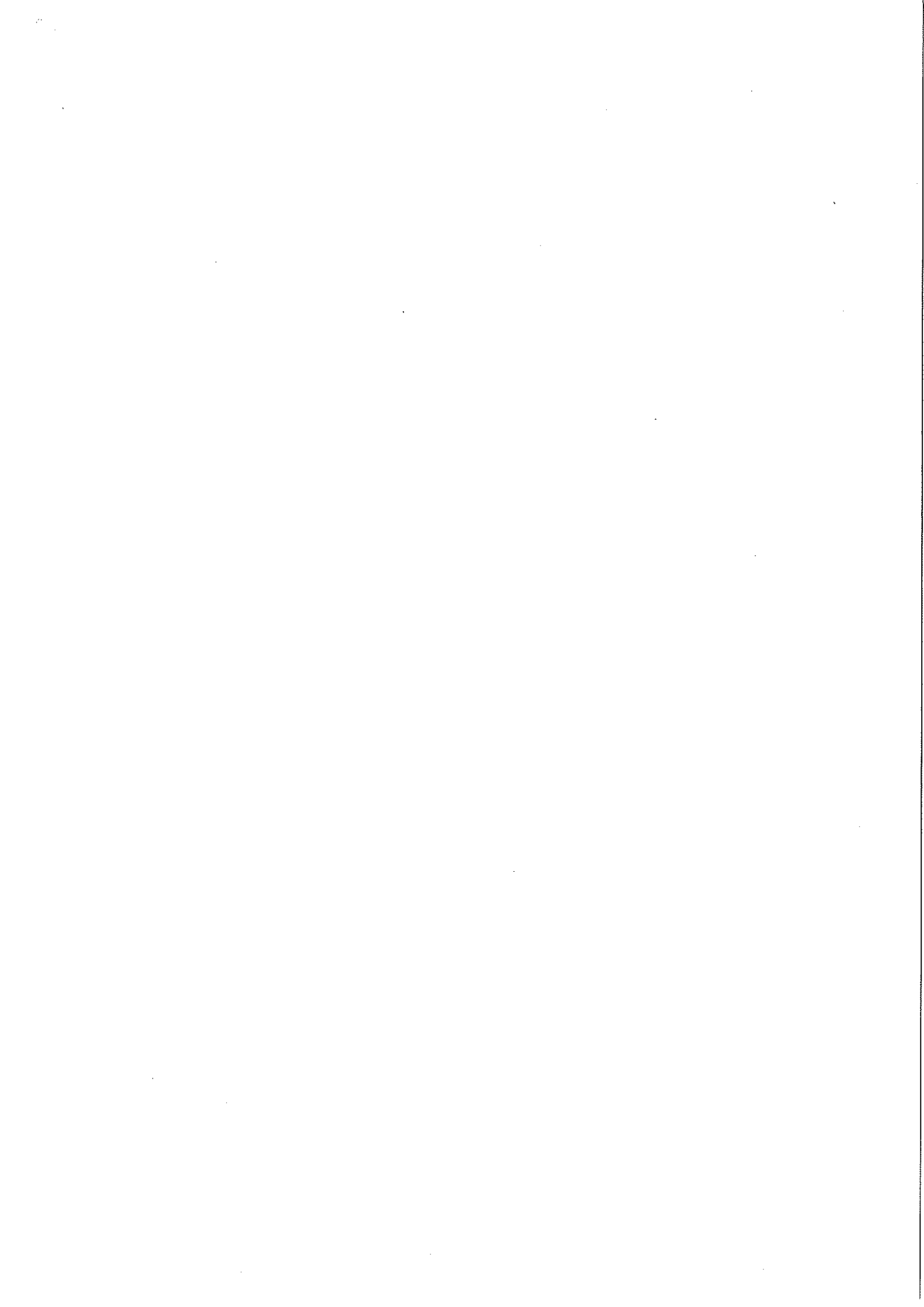


Annex B

Lewisham DPD Core Strategy Submission Consultation (Statutory Consultation period: 19 February 2010 – 6 April 2010)

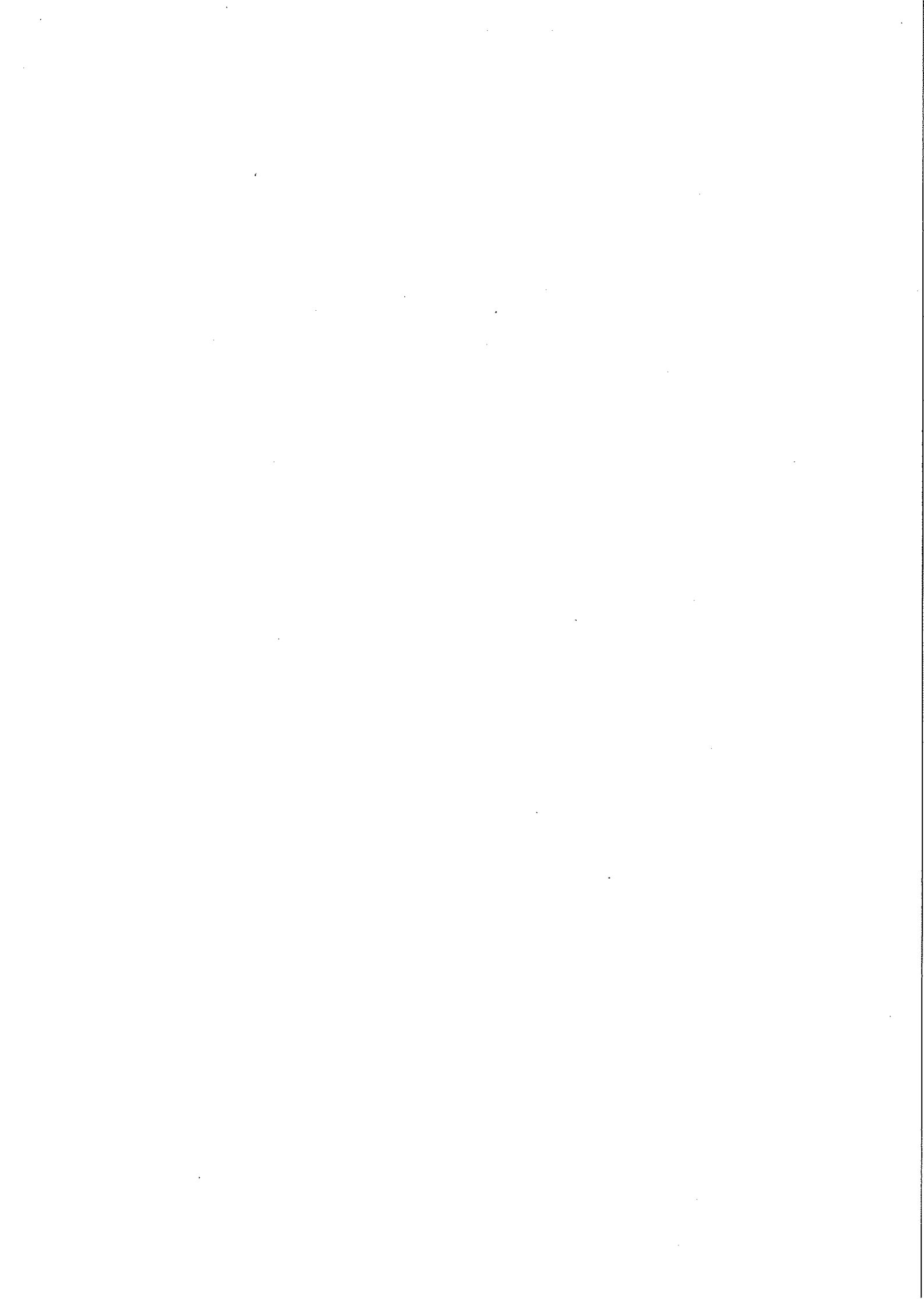
Representations from Transport for London (TfL)

GLA Ref. No.	Which part of the DPD does this submission relate to?	London Plan Policy cross ref.	Representations, including reasons for objection
1.	Section 1.4: How has it been prepared?	3C.2, 3C.16 Draft replacement London Plan 6.3, 6.12	TfL welcomes the commitment to base the contents of the Core Strategy on a strong evidence base as set out in Paragraph 1.21. It is noted from Lewisham Council's website that the Core Strategy is based on three studies – a Borough-wide transport study, a Lewisham town centre study and a North Lewisham study. The North Lewisham study has been seen by TfL and comments were provided to the borough. The lack of highway modelling, particularly for the A200 and A2 was set out in the comments as being a concern (in particular, as the study itself accepts that the level of development currently anticipated is likely to create congestion). However, the other two studies have not as yet been provided by the borough for feedback from TfL. TfL would welcome review of the two outstanding documents, in particular as the study area incorporates sections of the TLRN.
2.	Section 4: Building a sustainable community	3C.2 Draft replacement London Plan 6.3	Paragraph 6.63 states " <i>The DLR three car upgrade will increase capacity by a quarter in the peak period</i> " this is factually incorrect, the DLR three car upgrade will increase capacity by 50%. TfL requires that this is amended accordingly. It is noted that paragraph 9.31 correctly identifies the capacity increase of 50%.
3.	Section 4: Building a sustainable community	3C.2, 3C.20 Draft replacement London Plan 6.3, 6.7	Paragraph 6.66 states that " <i>East London Line extension Phase II, the Thameslink programme, investment in lengthening platforms and a further 20% increase in bus capacity</i> ". TfL would like clarification on where the figure of a 20% increase in bus capacity has originated from.



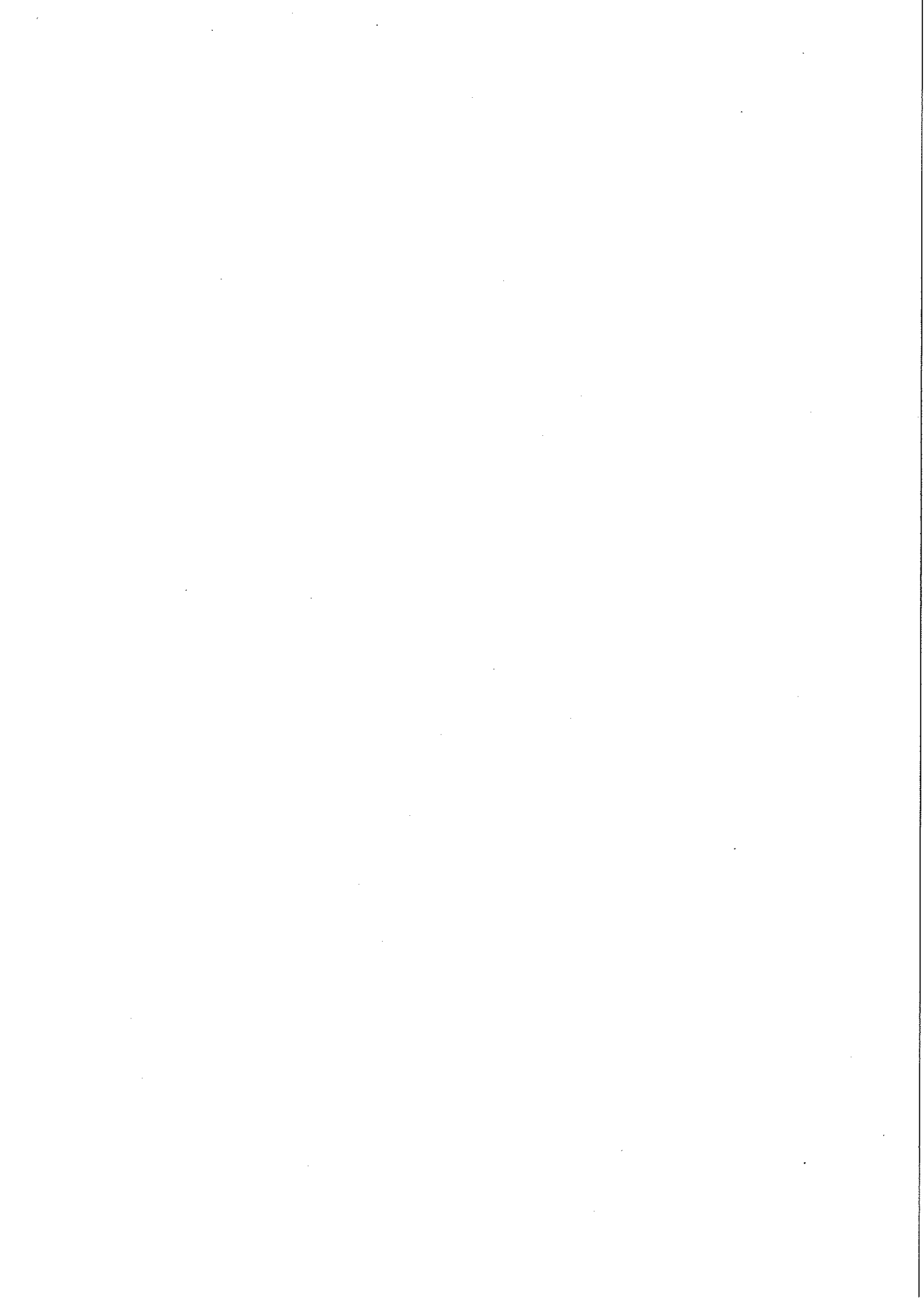
Annex B
Lewisham DPD Core Strategy Submission Consultation (Statutory Consultation period: 19 February 2010 – 6 April 2010)

GLA Ref. No.	Which part of the DPD does this submission relate to?	London Plan Policy cross ref.	Representations, including reasons for objection
4.	Core Strategy: Policy 4	3C.2, 3C.16 Draft replacement London Plan 6.3, 6.12	TfL welcomes the acknowledgement that development in the mixed-use employment locations will require improvements to public transport, public realm and walking and cycling provision under Core Strategy Policy 4. However, it is also felt that further highways improvements (such as the proposed opening of Dragoon Street at Evelyn Street) may also be necessary. It is also considered appropriate to pool contributions from development in these locations to deliver these improvements
5.	Core Strategy: Policy 5	3C.2, 3C.4 3C.20 Draft replacement London Plan 6.3, 6.7	TfL welcomes the consideration of potential future locations for bus depots at paragraph 7.24 of the Core Strategy.
6.	Core Strategy: Policy 14	3C.3, 3C.21 Draft replacement London Plan 6.1, 6.10	TfL welcomes the commitment to improving and maintaining the Strategic Walk Network under Core Strategy Policy 14. Where appropriate, the promotion of Key Walking Routes and Legible London would be welcomed in relevant Area Action Plans and supplementary planning documents.
7.	Core Strategy: Policy 21	3C.3, 3C.12A Draft London Plan: 6.1, 6.5	TfL welcomes the commitment to a separate planning obligations supplementary planning document covering transport as set out under Core Strategy Policy 21.



Annex B**Lewisham DPD Core Strategy Submission Consultation (Statutory Consultation period: 19 February 2010 – 6 April 2010)****Representations from Transport for London (TfL)**

GLA Ref. No.	Which part of the DPD does this submission relate to?	London Plan Policy cross ref.	Representations, including reasons for objection
8.	Section 9.8: Key milestones	3C.2, 3C.4 3C.20 Draft London Plan: 6.3, 6.7	Paragraph 9.31 states that during 2011-2016 " <i>Lewisham bus garage re-location complete providing increased capacity</i> ". TfL assumes that the milestone of relocating Lewisham bus garage refers to the town centre bus station that is being relocated as part of the Lewisham Gateway scheme rather than Catford Bus Garage. TfL would however request this is clarified within the bullet point to avoid any confusion.
9.	Section 9.9: Cross-borough issues	3C.2, 3C.16 Draft London Plan: 6.3, 6.12	TfL welcomes the adoption of partnership working with neighbouring boroughs to assess transport impacts of development as set out at paragraph 9.33. TfL would like to query whether any such assessment has been carried out for traffic impact, if so, involvement in the work would be welcomed. It is understood that Southwark Council has carried out traffic modelling of future developments in the Canada Water area, and as already advised, TfL would encourage Lewisham Council to build on this work to assess the potential impacts of development along the A200 corridor. It may be of interest to the Borough that TfL is currently developing a corridor model of the A200 to assess cumulative impacts of development which the Council may wish to utilise and developed further.



Annex B

Lewisham DPD Core Strategy Submission Consultation (Statutory Consultation period: 19 February 2010 – 6 April 2010)

Representations from Transport for London (TfL)

GLA Ref. No.	Which part of the DPD does this submission relate to?	London Plan Policy cross ref.	Representations, including reasons for objection
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10.	General	3C.1, 3C.2, 3C.3 3C.9, 3C.13 Draft replacement London Plan 6.1, 6.2, 6.3, 6.4	<p>Since the previous round of consultation on the Lewisham Core Strategy, the Mayor has published the <i>Mayor's Transport Strategy</i> (October 2009). Proposal 21 of the Transport Strategy committed the Mayor and TfL to work alongside the boroughs (amongst others) to undertake a review of options for the Bakerloo line. This review would be informed in part by the Lewisham Core Strategy. The Borough may choose to include a statement on how an extension could support the policies and the Borough's desire for the extension in the long term.</p> <p>Lewisham Council may also choose to include a reference to the Bakerloo Line Extension and potentially set out in a diagram a notional route that Lewisham consider would best support spatial development identified in the Core Strategy.</p>
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