

Green Group comments on proposed submission version of draft LDF Core Strategy

April 2010

Section 1: Introduction and explanation

	Sustainability appraisal
1.23	<p>We concur, as far as it goes, with the albeit limited definition of sustainable development as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”.</p> <p>But as a council we should be challenging publicly, rather than quoting approvingly, the government’s aim of ‘maintenance of high... levels of economic growth’, which is fundamentally contradictory to the aim of achieving sustainable development. High levels of economic growth are unlikely to be possible in a future of declining energy resources, so we should not be building this flawed goal into our plans for the future by citing it in the Core Strategy. It is also far from clear that it is possible to have economic growth without pollution, emissions and unsustainable rates of consumption of natural resources. For both these reasons, high growth is by definition not sustainable. We need a better, wider measure of societal success.</p> <p>It may be right to aim for some growth in Lewisham given the low level of private sector employment here, but in the bigger picture we can’t endorse this embracing of high growth as sustainable.</p> <p>What this Core Strategy could and should do is distinguish between the need to encourage Lewisham’s economy from a relatively low base and simply encouraging ‘growth for growth’s sake’ based on over-consumption of dwindling resources. For instance, reliance on a massive expansion of retail opportunities to deliver jobs for some local people will do nothing to address over-consumption and will in fact encourage unsustainable levels of consumption.</p>

Section 2: Lewisham today

	Jobs
2.23	Overall unemployment was 4.5% in July 2008 - this needs updating as the JSA claimant rate is now over 5%.
2.25	“Lewisham’s economy has a relatively small proportion of knowledge-based jobs.” How is a knowledge-based job defined? Are not many skilled manual jobs knowledge-dependent? If this is a euphemism for ‘office-based’ then this should be clarified.
2.26	<p>There are appear to be some fundamental flaws in the evidence base which has informed the conclusions in this paragraph and therefore informed the Core Strategy as a whole.</p> <p>First, future employment types are predicted by the accompanying Employment Land Study using a GLA study conducted in 2006, before the credit crunch and the ensuing recession which made plain the flaws and unsustainability of the prevailing economic model. The study assumes a steady rise in Lewisham jobs related to or dependent on the City of London, a prediction which must now be in serious doubt. The study’s greatest flaw is that it appears to project future jobs figures simply by extending past trends instead of taking a serious look at the likely shape of the future economy.</p> <p>Second, and related to the last point, the shape of the economy, and what will feature as viable</p>

	<p>future jobs by 2026, will be shaped by nothing more strongly than the changes that will be wrought by the fossil fuel depletion. Among other changes, this will require and drive a revival in domestic manufacturing for domestic production as long distribution chains become uneconomical.</p> <p>It seems likely, contrary to what is stated in the Strategy, that what will be increasingly insignificant is chain retail and office jobs. In the light of increasing energy scarcity, office jobs seem very unlikely to grow by the projected 52% between now and 2026. Planning for a net fall in industrial space could disadvantage our working population of the near future, and could leave Lewisham unprepared for responding to a shift towards domestic manufacturing.</p> <p>Third, and most importantly, the evidence base does not contain any examination <i>at all</i> of the current and future effects of fossil fuel depletion and energy scarcity, which will impact on every aspect of life in Lewisham – this despite there being a wealth of available evidence on the subject from varied and reputable sources. Without this, the whole basis of the LDF risks being undermined.</p>
2.6	Town centres
2.28	<p>This paragraph describes Lewisham and Catford as being supported by district town centres, out-of-centre retail parks, five neighbourhood centres and more than 80 parades and a range of markets.</p> <p>We urge the council to abandon this hierarchy model and abandon the notion and language of more local centres and parades as satellites of the major chain retail centres. They are in fact more important than those larger centres, forming – or having the potential to form – the hub of countless walkable communities across the borough, where people can obtain at least their day-to-day needs without taking motorised transport. Elsewhere the Strategy endorses this view of local centres and parades, yet the retail hierarchy as it stands undermines this goal by prioritising the two major centres.</p>
2.30	<p>The reasoning is not clear for the aspiration to give Lewisham town centre ‘metropolitan status’ – neither is this phrase defined. It would entail at least 20,000 sq m of retail floorspace. We object to this aspiration as fundamentally contradictory to sustainability. Overconsumption is one of the drivers of resource depletion and climate change, yet will be encouraged by these plans for still more retail provision for which there is no need. The council must state how it believes this deliberate stoking of overconsumption is consistent with its definition of sustainability.</p>
	Environment
2.32	<p>Climate change</p> <p>We welcome many of the changes made to this section following our earlier comments.</p> <p>However, clarification is necessary on fuel supply. This paragraph states that manmade climate change has implications for the way we use and manage the future supply, availability and use of energy. This, if referring to peak oil / fossil fuel depletion, is a little confused. In fact it is the supply and availability of energy (quite apart from the issue of climate change) which has implications for every part of the economy and society.</p> <p>We welcome acknowledgment of the importance of insulation, efficiency, housing standards and so on in combating climate change. It would be right to add detail on the imperative to reduce the need to travel.</p>
2.38	Waste

	We welcome the adding of the commitment to ‘reducing waste and ensuring behavioural change to ensure waste generation is reduced and recycling and composting are maximised.’
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Section 4: Vision for Lewisham 2026

4.8	<p>We welcome the reference to new initiatives for urban food growing and provision of allotments.</p> <p>But we ask where this provision is being ensured in the LDF. If this is accepted as important it requires concrete targets eg land area for food growing, or percentage of food grown locally, and some thought on how to measure these things. It should also lead to rules requiring a certain amount of food-growing space per residential unit in new developments.</p>
4.13	<p>"The local economy will be more diverse and will cater for new and growing sectors including green industries" - excellent. But a major incentive for green industries to locate here on a significant scale would be a major green industry park such as that at Dagenham Dock.</p>
	<p>"Convoys Wharf will see the reopening of wharf uses to provide a sustainable facility for the river transport of cargo." – Good. The Green Group believes that we should be making better use of the potential of the River Thames as a means of transporting goods to and from the borough and should ensure we have a working port/dock within our limited Thames frontage.</p>
4.16	<p>Good: "Vibrant hubs of local activity, centred on the district and local centres of Blackheath, Downham, Forest Hill, Lee Green, Sydenham, Hither Green and Brockley Cross, will anchor residential areas, deliver essential shops and services needed for daily life and provide enjoyable places for people to meet and use, and will be supported by locally significant business areas. These centres will also be supported by a network of viable local shopping centres and parades such as Crofton Park, Lewisham Way and Grove Park that will provide accessible services and facilities reducing the need to travel."</p>

Section 5: Strategic objectives

	<p>Growing the local economy Core strategy objective 4 – economic activity and local businesses</p>
5.7	<p>Investment in new and existing business and retail development will be facilitated – good regarding investment in business, but we should not actively facilitate investment in retail blindly - it should be retail that meets basic community needs instead of the big-box, turbocharged, chainstore overconsumption and shopping-as-leisure-pursuit. That distinction should be made in this section.</p> <p>We object to point d: Attractive as it might seem to provide ‘top of the range shops’ seen to be rivalling Bluewater and the West End, unless this is allied to a wholesale increase in the spending power of local people it will risk becoming a white elephant or simply provide nothing for the majority of local people. Striving to create a ‘destination shopping centre’ as a priority risks being a huge misinvestment of precious resources, sending Lewisham in a direction that would soon prove unsustainable as climate change and oil depletion demand a relocalisation of the economy in which people are able to obtain most needs in their immediate walkable neighbourhoods.</p> <p>A more inspiring headline aspiration than making Lewisham a ‘metropolitan shopping centre’ would be for every parade to be a ‘Nunhead’ – hosting for example a baker, butcher, fishmonger, grocer, florists and post office. No-one should be further than a short distance away from a good range of</p>

	local services on an easily accessible walking and or cycling route (no large hills, difficult and dark alleys or bridges that deter people from walking). We welcome the listing of farmers' and street markets as important elements.
	Core strategy objective 6 – flood risk reduction and water management
5.9 d	We welcome the requirement for sustainable urban drainage systems in new development, wherever feasible.
	Core strategy objective 8 – waste management
5.11	We welcome the implementation of the Green Group's earlier suggestion that composting be added to the waste hierarchy and that it should appear above recycling. 'Repair' should also be included as an element of the hierarchy. We believe this short section would benefit from the inclusion of wording which makes it clear that we are aiming for a sustainable and productive waste cycle rather than a polluting and unsustainable waste stream. Some detail should be given on how the council might foster and facilitate a re-use / repair economy. The goal to reduce and reuse demands some concrete detail on how we will foster and facilitate a re-use economy of some kind, with repair centres, workshops, training, etc.
	Core strategy objective 10 – Protect and enhance Lewisham's character
5.14	Lewisham's character is as much dependent on community spaces and diverse high streets as it is on urban design and architectural considerations, so this section should include a commitment to using planning rules to protect the diversity of local high streets and community amenities such as pubs.

Section 6: The spatial strategy

p40	Spatial policy 1
	All new development will have to have high standards of sustainable design and construction, including maximising energy efficiency and the provision of on-site renewables – excellent
p43	Spatial policy 2 – Regeneration and growth areas
	70,000 sq m of new retail floor space by 2026: Why do we need more retail space and how can this be reconciled with the need to reduce consumption and waste? This is a fundamental contradiction which must be explained, and we therefore object to this aspiration.
p44	Deptford, New Cross: It will support smaller-scale local retail uses on-site where larger scale redevelopment occurs. Good, <i>if</i> by smaller-scale this means affordable premises for local businesses in new developments and that daily needs can be met locally in new residential developments. But what does it mean exactly?
	Mixed use employment locations
6.24	We have concerns about the reliability of the predictions of employment land need, as the evidence base for the predictions made appears to rely on an assumption that current or recent trends will

	<p>simply continue on the same trajectory. We think the issue of what kind of employment land is needed for the future needs to be re-examined, taking into account the post-recession restructuring of the economy and taking into account the effects of fossil fuel depletion.</p>
6.34	<p>Excellent - address severance issues in the north of the borough by improving public transport and pedestrian links.</p>
	<p>Great – Alter relationship with the river – but this should include practical business / industrial / transport uses.</p>
	<p>Retail and town centres</p>
6.37	<p>While the major town centres are those prioritised for growth, we believe a better ordering of the Core Strategy's priorities would be to begin this section by declaring that, instead of 'the focus' being on achieving metropolitan status for Lewisham (a goal whose <i>benefits</i> continue to go unexplained), the first priority of the retail and town centres strategy should be that everyone can reach essential daily goods and services within reasonable walking distances, and that this means our attention is most intensely concentrated on ensuring that every local centre, local parade, borough village and so on is served by outlets providing those goods and services.</p> <p>Large-scale metropolitan-style retail may co-exist with these for as long as it is viable, but our first priority on retail should be to protect, enhance and promote our 'village' economies. We welcome the other parts of the strategy that mention the importance of local centres, but their central and primary importance should be reflected by beginning this section of the Core Strategy with addressing them, and by inverting the 'retail hierarchy'.</p>
6.39	<p>This section cites the London Plan as supporting the enhancement of shopping facilities within existing centres as areas which are "sustainable and necessary for city living". This wording in the London Plan does not support the expansion of retail by 25% in Lewisham town centre, which is what the council is proposing. This planned expansion is inherently unsustainable and plainly not "necessary for city living".</p> <p>'Destination shopping' will by its nature harm local 'village' economies by attempting to entice shoppers from their neighbourhoods to the metropolitan centre. Encouraging large-scale retail is to encourage the undermining of local village economies. Encouraging 'destination shopping' encourages unnecessary travel contrary to our climate change obligations.</p> <p>We therefore oppose this plan.</p>
6.40	<p>We are concerned that there appears to be no plan B for Lewisham Gateway despite the financial uncertainties that would surround such a large project at this time of economic uncertainty. We believe the LDF requires an alternative workable path or paths to be set out in some form should a major partner pull out or a major element become unviable.</p> <p>We also have serious concerns about some fundamental aspects of the current plans, including the likelihood that air pollution will increase and affordable housing is lacking. There should be a vigorous and in-depth reappraisal of the Gateway plans which is not based on outmoded and unsustainable means of regeneration.</p>
	<p>We welcome plans to open up and further naturalise the riverside in Lewisham town centre.</p>
6.44	<p>We welcome plans to enhance the role of local shopping centres and parades but we believe this section (p12) requires much more detail, and more explanation is required of the phrase "their role enhanced through the protection of appropriate retail uses".</p>

	Climate change
6.45	<p>We find it ambitious and welcome that the strategy says a renewable energy network based on a CHP or SELCHP could make north Lewisham energy self-sufficient, and we think the calculations showing that this is possible need to be set out – if the numbers add up this is clearly extremely welcome. However, we would oppose reliance on the incinerator for this, because the health risks have not been established and because the requirement to feed the incinerator is a disincentive to reduce the waste stream.</p> <p>We would prefer that this project rely on the option for a biomass CHP, which - as well as the local benefits in energy supply - could provide employment, either in Lewisham or outside, in the production of biomass fuel sources. We welcome the stating of the biomass CHP option rather than the less sustainable gas CHP possibility.</p>
	Flood risk
6.52	<p>Property is 'protected by flooding by the Thames tidal defences up to the 1 in 1000 year event'. But is the probability raised in the various climate change scenarios available to us? This needs to be clarified and any set of adjusted flood risk figures published. A large proportion of planned development sites are in a high probability flood risk area – more information is needed on how much that risk is reduced by the 'adequate mitigation' measures mentioned. It remains possible that building on these flood plains is the very definition of unsustainable development. We need to know with much greater certainty that we are not committing to a massive misallocation of resources.</p>
6.2.2	District hubs
6.77	<p>We welcome the endorsement of district town centres and the recognition of them as "sustainable in that the local community can shop for most day to day needs without the need for long distance travel".</p>
	Climate change and environmental management
6.96	<p>New development will need to be designed 'to limit CO2 emissions' – this form of words risks being virtually meaningless and needs a more solid definition and stronger language. 'make provision for good use of decentralised or renewable or low carbon energy' – again, 'good use' is fudgy language. 'Buildings will need to reflect best practice sustainable design and construction' – good.</p>
	Local hubs
6.108	<p>We are concerned that a commitment in the pre-consultation version of the Core Strategy contained a welcome protection of locations at Brockley Cross for office, industrial and warehousing uses but that this appears to have disappeared in this consultation version – and in fact reversed, with those locations now earmarked for 'smaller scale mixed use development'. If this has changed, an explanation is required.</p>
p64	<p>Spatial Policy 4</p> <p>Brockley Cross</p> <p>Good regarding developments needing to provide suitable premises to enable an increase in the number and variety of businesses, and to protect the local shopping parade to ensure provision of day-to-day retail needs and employment. Plus improvement of pedestrian environment – but this</p>

	should include a commitment to improving the much-hated double roundabout.
	Growing Lewisham's economy
6.117	We welcome recognition of the local shopping parade at Brockley Cross as providing a vital function, that the primary function is to meet everyday needs and that it represents a sustainable resource by minimising unnecessary shopping journeys.
6.119	We welcome the intention to identify opportunities for improvements to shopfronts and parades but would prefer there to be an explicit commitment to providing incentives and support for this.
	Climate change and environmental management
6.121	New development will need to be designed 'to limit CO2 emissions' – again, this is virtually meaningless and needs a more solid definition and stronger language. 'make provision for good use of decentralised or renewable or low carbon energy' – again, 'good use' is fudgy language. 'Buildings will need to reflect best practice sustainable design and construction' – good.
	Sustainable movement
6.128	We welcome recognition that the approach to Brockley station requires improvement. We believe there should be serious consideration given to the pedestrianisation of Coulgate Street, as called for by the Brockley Assembly. We think the statement that Brockley has relatively good public transport has been thrown into doubt by cuts to Southern train services. We welcome the acknowledgement, following our earlier comments, that bus services through Brockley could be improved.
	Areas of stability and managed change
	Spatial policy 5
p70	We welcome the commitment to retaining and protecting shopping areas that contribute to local day-to-day retail needs and employment, and to protect and support smaller local parades.
1C	Conversions and the need to protect family houses
6.143	We welcome the council's intention to look critically at conversions of family sized homes.
	Local shopping areas and local parades
6.153	We welcome recognition of local shopping parades as providing a primary function of meeting everyday needs and that they represent a sustainable resource by minimising unnecessary shopping journeys.
	Climate change and environmental management
6.155	New development will need to be designed 'to limit CO2 emissions' – this is virtually meaningless and needs a more solid definition and stronger language. 'make provision for good use of decentralised or renewable or low carbon energy' – again, 'good use' is fudgy language. 'Buildings will need to reflect best practice sustainable design and construction' – good.
4A	Sustainable movement

6.167	Excellent: In these areas 'walking and cycling will be the priority to improve connections and access ... Routes to schools, town centres and rail stations will be improved to function in a more integrated manner ... Schools will need to encourage cycling and walking as the primary means of access.'
4B	Community wellbeing
6.169	<p>We are disappointed not to see any sign of policies to protect and support pubs as important community hubs, only a vague promise to 'encourage' them. The Core Strategy should signal the intent to provide a full community pubs policy, possibly as a Supplementary Planning Document. It should:</p> <ul style="list-style-type: none"> • Develop a Lewisham public house viability test informed by one developed by the Campaign for Real Ale so the planning process does not simply accept on trust the owner's claim that a pub is not commercially viable – they should also be asked to demonstrate that reasonable means of retaining the use had been explored, and the test might include looking at the potential local market, competition and transport links • Develop an assessment for the amenity value of a pub and formally recognise in local planning policy that a pub may be more than just another business and may be providing community important community functions. Loss of amenity can be used as a reason for turning down a change of use • Specify that the pub must have been on the market, for a defined period, as a pub, at a professionally assessed market price, with a recognised specialist pub sales agent • Classify pubs as potentially important community facilities in order to reduce the risk to the council if it wishes to put an order preventing a sudden overnight demolition. At present a council which uses an Article 4 direction to halt a sudden demolition would face compensation claims if the demolition is later allowed on appeal. But if the pub is classified as an important community facility the council should be free from that risk. This would not slap a draconian ban on closing a pub but give breathing space for a measured decision to be taken before a demolition changes the 'facts on the ground'
6.170	We welcome the intention that maximum use of new school facilities for wider community use is expected but note that this has fallen short in reality and needs to be addressed.
6.171	We oppose replacement of neighbourhood-based, diffuse GP and dental surgeries with polyclinics where these make access more difficult and centralised – as they inevitably will in most cases.
4C	Protect and enhance Lewisham's character
6.173	Planning applications for household extensions and adaptations should carry conditions that energy efficiency or renewable energy work be undertaken on the whole property to ensure that the extended property produces the same or smaller amount of greenhouse gas emissions as the unextended property – and that this calculation take into account the emissions involved in construction and embedded in the materials used. This should be stated here and set out in detail in the SPD.
6.176	Conservation area appraisals and SPDs should assume a broadly sympathetic view of renewable energy installations and external energy efficiency measures. This should be stated here and set out in detail in the SPD.

Section 7 – Cross cutting and thematic policies

	Housing affordability and mix
7.12	<p>“The council is setting affordable housing policy for the plan period ... during which market conditions are forecast to improve.” This begs to be accompanied by an explanation. It may or may not be true, but what is the evidence base for this assertion, on which many important investment and development decisions and plans will be made?</p>
	Core strategy policies on employment land
	<p>We think it a missed opportunity not to single out green tech industry (which has a wider meaning than merely the recycling alluded to at 7.27) as an area for encouragement and future employment in Lewisham, as has been done for creative industries. And that it is a missed opportunity not to consider a major green industries park on the model of Dagenham Dock which could give local workers a great advantage in an emerging and maturing green economy. The SILs mentioned at 7.27 seem possible candidate sites for such a facility.</p>
7.24	<p>We welcome the protection of LELs with small industrial / workshop units, which are likely to be increasingly important as the dwindling of energy supplies seems likely to favour localisation and the loss of some economies of scale subsidised by cheap energy. We agree that they can play a role in supporting the viability of district and local centres. There may be a case for allowing a future expansion in the number of such units, so we are concerned about possible implications of the wording that protection is given to ‘designated LELs’ – what proportion of such light industrial and workshop sites are not designated and protected, and what proportion risk being lost?</p>
7.26	<p>We have reservations about the loss of SIL to MEL for the reasons given above. We are concerned that the stated aim of reducing local levels of deprivation and unemployment would not be achieved through loss of industrial land to office space (if that is the type of workplace envisaged in the mixed-use category), housing and gentrification, however welcome an improvement to the public realm is.</p>
	Retail and town centres
p87	<p>Core Strategy Policy 6 – retail hierarchy and location of retail development</p> <p>Our earlier comments about the structure of the retail hierarchy, and the primary function of retail being to meet daily local needs, apply, and that it is the council’s duty to NOT promote, encourage and facilitate retail for retail’s sake, as it is unsustainable.</p> <p>We welcome the inclusion of street and farmers’ markets in the policy, and believe they should be given a place in the ‘hierarchy’, their importance and potential recognised and suitable protections and promotion committed to by the council. Lewisham and Deptford markets are important as a reliable source of low-cost fresh foods serving Lewisham’s population. The street markets also provide foods wanted by our ethnically diverse population that the supermarkets fail to. ‘Upmarket’ outlets such as M&S food halls might be attractive to some but would offer little to those local residents who cannot afford to shop there or in fact might prefer something the market experience.</p> <p>These views have been echoed by a government announcement last year – see http://www.communities.gov.uk/news/corporate/1355197</p> <p>The council will protect local shopping facilities ‘where there is an economic demand for such services’. We believe this needs to be much stronger: council policy and the retail hierarchy should actively promote local, walkable shopping over ‘destination’ and major town centre shopping, and</p>

	patterns in which local parades struggle because people are travelling to better-promoted centres farther away should not be a reason to withdraw council protection but in fact to redouble it.
	Policy justification
7.35	This paragraph appears to assume that because the retail sector has grown in the past, they will continue to do so. This does not appear to be a sound basis for mapping future employment patterns.
7.36	We question the validity of the projected growth in expenditure demanding additional shopping facilities. We are in the midst of a very shaky technical recovery, at risk of a double-dip recession, with unemployment continuing to rise and no sound justification for expecting a return to turbo-charged consumerism. This projection seems outmoded and would make a shaky basis for retail planning.
	Climate change and environmental management
7.3	This section should incorporate 'oil depletion' or 'energy uncertainty' or some other reference to future energy scarcity in its title and accompanying detail in the policy justifications starting at 7.56.
	Core Strategy policy 7 – Climate change and adapting to the effects
	We welcome the addition of the words 'and incentivise' at our suggestion. At b, the aim of reducing the consumption of natural resources is fundamentally contradictory to other Core Strategy policies which actively encourage the growth of retail and destination shopping. The latter need to come into conformity with the climate change policy. This is a fundamental contradiction which undermines the credibility and usefulness of the LDF.
	Core Strategy policy 8 – Sustainable design and construction and energy efficiency
	5 – retrofitting: We believe there should be a condition set that extensions will require energy efficiency work or renewables in the rest of the building so the extended building has the same or fewer emissions than the original, unextended building.
7.3.2	Waterways and flooding
	Core Strategy policy 10 – Managing and mitigating the risk of flooding
	We welcome commitments to requiring the best SUDS that is practical and to water conservation and harvesting systems. The wording on rainwater harvesting should be strengthened so a firm requirement for these on all developments and extensions is unambiguous. Also, at present it only refers to what the council will do rather than laying down any conditions for developers to meet.
	Core Strategy policy 11 – River and waterways network
	2. Development adjacent to rivers – Good, but there should be a presumption and a strong statement against developments going right up to the river and in favour of public access to the river bank, with pedestrian and cycle paths being provided. This is particularly important in respect of the stretch of the Thames that is in the borough: the opportunity should not be lost to complete that section of the Thames path with any future developments.

7.3.3	Open space and biodiversity
7.78	We welcome the commitment to protecting, promoting and managing biodiversity, and to the opening statement, inserted at our suggestion, that biodiversity provides an essential system on which we depend.
	Core Strategy policy 12 – Open space and environmental assets
	1. While the recognition is obviously welcome, the ‘strategic importance’ of the natural environment does not do justice to the importance of the natural environment and biodiversity. A more appropriate wording might be ‘In recognising our dependence for survival and prosperity upon the health and biodiversity of the natural environment...’
	We welcome at 2k the commitment to promoting and supporting local food growing and urban agriculture. But we strongly believe there should be a commitment in Core Strategy policy 12 – or preferably in a new CS policy entirely devoted to food production, supply and security - to increase the current 26ha classified as allotments and community gardens. It is essential for the sustainability and welfare of a community – if it is to be resilient to outside shocks and energy depletion - to extend its capacity to produce food locally, and it is important enough to require the setting of concrete and ambitious targets. This could also extend to targets for numbers of edible fruit and nut trees in Lewisham’s parks. Larger new housing developments should include provisions for community gardens for growing food, and provision for extra allotments also needs to be considered in large scale developments.
	There is local concern in Lewisham that the UDP did not include nature reserves and allotments in its definition of open space. We call for this to be rectified in the Local Development Framework.
7.3.4	Waste management
7.101	We welcome the change made at our suggestion that the key priority should include the minimisation of waste being generated, not just the minimisation of waste going to landfill. As far as possible it should also be about creating a productive waste cycle rather than a linear ‘disposal’ process. This should include the cleanest methods of energy from waste (including eg biogas from organic waste) and a much stronger emphasis on composting – not just in individual homes and gardens but on community, block and estate scales. ‘Repair’ should also be included as an element of the waste hierarchy. Some detail should be given on how the council might foster and facilitate a re-use / repair economy. The goal to reduce and reuse demands some concrete detail on how we will foster and facilitate a re-use economy of some kind, with repair centres, workshops, training, etc.
	Core Strategy policy 13 – Addressing Lewisham’s waste management requirements
	1. The waste hierarchy listed here does not match that at 5.11 and should mention composting.
	3a. This is not strong enough – instead of requiring only the promotion of reuse, segregation, recycling and composting, there should be a requirement for designs to provide the facilities for these.
	3c. The London Plan target of 95% recycling and reuse of construction waste is welcome.
7.4	Building a sustainable community

	Sustainable movement
	This section should contain a commitment to facilitating, promoting and supporting car clubs.

Section 9 – Delivery, implementation and monitoring

9.10	Risk assessment
	In line with our earlier comments, this section on risks – like that on drivers of change – has a gaping hole in it if it does not analyse the implications of fossil fuel depletion.
	Employment and retail and town centres
9.45	We welcome the deletion of the rash assertion in an earlier version that the recession was “ largely considered to last for the short term”. However, the failure to take oil depletion properly into account has blinded this report to the likely disruptive and continuing long-term effects of volatile energy prices on the economy and employment, including on the viability of today’s unsustainable pattern of retail dependent on long distribution channels made possible by cheap energy and transport costs.
9.51	In light of the comments at 9.45, we welcome the statement here that smaller local employment areas must be preserved even in the recession, and that the council will endeavour to resist conversions from employment to residential use.