

Full Name: **Mr Geoffrey Thurley**

Organisation **Ladywell Society**

Number: Table 9.2 Title: Projected housing completions 2009/10 to 2025/26 ID: 11

Legal Compliance: Soundness: No

Reasons for Unsoundness: (1) Justified

Reasons for Non-Compliance: The figures for the total number of dwellings to be completed (18,165) has not been justified. The London Plan does not require this number of new dwellings (15,600). The additional requirements for services, school places etc. has not been taken into account.

Suggested Changes: An in-depth study of the requirements of the additional population needs to be done before this policy can be implemented, with any revisions taken into account. The London Plan requirements need to be adhered to and not exceeded.

Attend Oral Exam: No, I do not wish to participate at the oral examination

Reasons for Attendance:

Other Comments:

Number: 7.10 Title: Paragraph ID: 2

Legal Compliance: Soundness: No

Reasons for Unsoundness: (1) Justified

Reasons for Non-Compliance: The SHMA evidence quoted shows that the "overwhelming housing need is spread across the borough rather than being concentrated in particular locations". However the Policy is for the majority of housing, 10,625 out of the 14,975 proposed for the Regenerative and Growth Areas, to be in the Deptford/New Cross Area. Taking the proposed Borough-wide total of new housing by 2026 (18,165), the majority of housing is still in the north of the Borough.

Suggested Changes: The Policy needs to be redefined to line up with the SHMA findings and the housing requirements of the London Plan.

Attend Oral Exam: No, I do not wish to participate at the oral examination

Reasons for Attendance:

Other Comments:

Number: Core Strategy Policy 6 Title: Retail hierarchy and location of retail development ID: 3

Legal Compliance: Soundness: No

Reasons for Unsoundness: (2) Effective

Reasons for Non-Compliance: In respect to 2a, to maintain a vibrant mix of shopping facilities, the Council should consider limiting the number/percentage of A3/A5 uses v A1 retail units, particularly in Neighbourhood local centres and Parades.

Suggested Changes: A 50% maximum of A3 and A5 units should be considered. If the designation of betting shops is changed by government legislation, the Council should use this to limit the number of outlets in all retail hierarchy designations.

Attend Oral Exam: No, I do not wish to participate at the oral examination

Reasons for Attendance:

Other Comments:

Number: Core Strategy Policy 16 Title: Conservation areas, heritage assets and the historic environment ID: 4

Legal Compliance: Soundness: Yes

Reasons for Unsoundness:

Reasons for Non-Compliance:

Suggested Changes:

Attend Oral Exam:

Reasons for Attendance:

Other Comments:

Number: Core Strategy Policy 17 Title: The protected vistas, the London panorama and local views, landmarks and panoramas ID: 8

Legal Compliance: Soundness: No

Reasons for Unsoundness: (2) Effective

Reasons for Non-Compliance: The protection of Local Views and Panoramas from the effects of developments are not taken seriously during the planning process.

Suggested Changes: Correct implementation of the Policy to make it effective. The opinions of residents who use these Local Views should be taken properly into account.

Attend Oral Exam: Yes, I wish to participate at the oral examination

Reasons for Attendance: The importance of keeping Local Views and Panoramas unimpeded cannot be stressed enough.

Other Comments:

Number: Core Strategy Policy 18 Title: The location and design of tall buildings ID: 9

Legal Compliance: Soundness: No

Reasons for Unsoundness: (2) Effective

Reasons for Non-Compliance: The policy fails to address the question of the cumulative effect of tall buildings on streetscape, skyline, quality of life, microclimate etc. The policy in 1. states that tall buildings will be directed to existing clusters. There is no limit placed on the number permitted in a complete area such as Lewisham town centre. At the time this policy was drawn up there was only one "tall building" in Lewisham town centre. There is still (April 2010) only one tall building, but outline permission has been given for 6 tall buildings on the Gateway site. This was used as a precedent for another 8 buildings, 6 of which can be classed as "tall" on the adjacent Loampit Vale site. In close proximity to this is the Thurston Road/Jerrard Street site which has permission for 2 tall buildings. The total area for these developments is less than one hectare. The Local Action Area of central Lewisham includes these and other sites, all of which could contain "tall buildings".

Suggested Changes: It is necessary to specify the number of tall buildings that are permitted in a given area. The cumulative effect of all developments must be considered, and the planning process must consider each application in the context of what exists, or has permission to exist.

Attend Oral Exam: Yes, I wish to participate at the oral examination

Reasons for Attendance: I consider this to be an important issue for the health and well-being of the residents of Lewisham, because of its long-term effects.

Other Comments:

Number: 7.91 Title: Paragraph ID: 5

Legal Compliance: Soundness: Yes

Reasons for Unsoundness:

Reasons for Non-Compliance:

Suggested Changes:

Attend Oral Exam:

Reasons for Attendance:

Other Comments:

Number: 7.92 Title: Paragraph ID: 6

Legal Compliance: Soundness: Yes

Reasons for Unsoundness:

Reasons for Non-Compliance:

Suggested Changes:

Attend Oral Exam: No, I do not wish to participate at the oral examination

Reasons for Attendance:

Other Comments:

Number: 7.94 Title: Paragraph ID: 7
Legal Compliance: Soundness: Yes

Reasons for Unsoundness:

Reasons for Non-Compliance: The enhancement and expansion of Open Spaces including Metropolitan Open Land is of the utmost importance. Development on MOL has to be actively resisted. Increasing the number of open spaces designated as MOL should be of prime importance.

Suggested Changes:

Attend Oral Exam: No, I do not wish to participate at the oral examination

Reasons for Attendance:

Other Comments:

Number: 1.22 Title: Paragraph ID: 1
Legal Compliance: Soundness: No

Reasons for Unsoundness: (2) Effective

Reasons for Non-Compliance: The Council set up Ward Assemblies so local people could directly input into Council policy. Ward Assemblies were not consulted on the Core Strategy.

Suggested Changes: Ward Assemblies should have been consulted, and asked for input about their own Wards.

Attend Oral Exam: No, I do not wish to participate at the oral examination

Reasons for Attendance:

Other Comments:

Number: Figure 8.5 Title: Site boundary for Lewisham Gateway strategic site allocation ID: 10
Legal Compliance: Soundness: No

Reasons for Unsoundness: (1) Justified

Reasons for Non-Compliance: The current shopping precinct (The Lewisham Centre) is currently under-used by retail outlets: one section is screened off, and has been for many months despite attempts by the landlord to let the area. First floors are under utilised, or not used at all. There is no justification for expanding the retail "offer" in the way suggested. Office space could be increased at a stroke by utilising the unused Citibank Tower at 25 Molesworth Street. A floor or two of offices could be built on top of the Lewisham Centre. Far from being "opened up" the River Ravensbourne will be covered over in Molesworth Street; the River Quaggy will be obscured from view as the realigned Lewisham High Street will be hard up against its culvert wall. Metropolitan Open Land will be lost on Molesworth Street. This contravenes both Council Policy and the London Plan. The new London Plan (under discussion) states that "development that involves the loss of MOL in return for the creation of new open space elsewhere will not be considered appropriate". The new "Confluence Park" will be a through way from the stations, small, and hemmed in by tall buildings, and so not a suitable replacement. Cycle lanes all the way round the development area are not proposed, so there will be no continuity for cyclists. Pedestrian routes round the site will be restricted, particularly at the site of bus stops on Molesworth Street. The main cross road (the bar of the "low H" design) will always be congested so will be a barrier to pedestrians moving from the stations/new development to the Lewisham Centre/Lewisham High Street. Air Quality, already below standard, will be made worse by congested traffic.

Suggested Changes: Expansion and full occupancy of the existing Lewisham Centre would do away with the need for this scheme. Discussions with the owners of Citibank Tower to either let out offices, or for the Council to purchase the building, would expand office floor space.

Attend Oral Exam: Yes, I wish to participate at the oral examination

Reasons for Attendance: This policy is flawed.

Other Comments:

Full Name: **Ms Mary Drabble**

Organisation **Ladywell Society**

Legal Compliance: Yes Soundness: Yes No

Reasons for
Unsoundness: (2) Effective

Reasons for Non-
Compliance: Paragraph 2c is too vague to be effectively implemented. What would constitute 'evidence'? 2 examples of planning applications for change of use recently (222 Algernon Road, 105 Ladywell Road) from A1 Retail to A5 hot food takeaway were granted because there are no clear policies regarding the need to limit the percentage of A3/A5 units to support the variety of the retail mix in local shopping parades especially. At both planning committees, above, the councillors sitting were very sympathetic to the objections from local community groups, but under planning policy, didn't have a reason to refuse planning. It should be noted that in this instance, neither unit has opened as a hot food takeaway as there simply isn't the demand.

Suggested Changes: Include wording to regarding the need to limit the percentage of A3/A5 units to no more than 50% of the units in local shopping parades, to support the variety of the retail mix. Additionally we would welcome a clear policy regarding fast food restaurants applying for planning permission near schools, with a suggested exclusion zone of 600m radius. Define acceptable forms of evidence, both for and against.

Attend Oral Exam: No, I do not wish to participate at the oral examination

Reasons for
Attendance:

Other Comments:
