

Full Name:

Organisation **Loromah Estates Ltd**

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Number: 6.159 Title: Paragraph ID: 6  
Legal Compliance: Yes Soundness: No  
Reasons for Unsoundness: (1) Justified (2) Effective (3) Consistent with national policy  
Reasons for Non-Compliance: Para 6.159 - 6.164 (inclusive) convey the impression that all private areas of open space (including residential gardens and other backland sites) should be protected. This is clearly misleading and a misrepresentation of national policy guidelines. The CS must make the distinction between such 'open space' sites which often offer ideal sources of new housing land supply, from the other areas of publicly accessible open space which should be protected for their public recreational value.  
Suggested Changes: As above, the CS needs to be reworded to ensure certain types of open space (including domestic gardens and other backland areas) are not undeservedly protected from development and discounted as potential sources of housing land supply.  
Attend Oral Exam: No, I do not wish to participate at the oral examination  
Reasons for Attendance:  
Other Comments:

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Number: Core Strategy Policy 8 Title: Sustainable design and construction and energy efficiency ID: 7  
Legal Compliance: Yes Soundness: No  
Reasons for Unsoundness: (1) Justified (2) Effective (3) Consistent with national policy  
Reasons for Non-Compliance: The #3 requirement of Core Strategy Policy 8 for all new housing to comply with Level 4 of the Code for Sustainable Homes by April 2010 and Level 5 by 2012 is a) not based on national or London Plan policy requirements and b) is premature to require ahead of a sustained housing market recovery.  
Suggested Changes: The policy should not be worded in a mandatory fashion. Instead, it should aspirational only and merely encourage developers to meet these requirements. The CS can be updated and the policy made more mandatory once a sustained market recovery has been established.  
Attend Oral Exam: No, I do not wish to participate at the oral examination  
Reasons for Attendance:  
Other Comments:

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Number: Spatial Policy 3 Title: District Hubs ID: 5  
Legal Compliance: Yes Soundness: Yes  
Reasons for Unsoundness:  
Reasons for Non-Compliance: Spatial Policy 3 (subject to clarification of the definition of 'Immediately surrounding' residential neighbourhoods - i.e. with 10 mins / 800m walking distance of a district hub as defined by the London Plan), acknowledges the importance of such locations for future housing intensification to meet sustainability objectives and support the future viability of district centres.  
Suggested Changes: As above.  
Attend Oral Exam: No, I do not wish to participate at the oral examination  
Reasons for Attendance:  
Other Comments:

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Number: Spatial Policy 1 Title: Lewisham Spatial Strategy ID: 3  
Legal Compliance: Yes No Soundness: No  
Reasons for Unsoundness: (1) Justified (2) Effective (3) Consistent with national policy  
Reasons for Non-Compliance: Reference at #4 to resisting development on open space.  
Suggested Changes: Text should be reworded to resist development on 'PUBLIC' open space only - i.e. only those areas of open space which are accessible to the general public.  
Attend Oral Exam: No, I do not wish to participate at the oral examination

Reasons for  
Attendance:

Other Comments:

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Number: Spatial Policy 1 Title: Lewisham Spatial Strategy ID: 4

Legal Compliance: Yes Soundness: No

Reasons for  
Unsoundness: (1) Justified (2) Effective (3) Consistent with national policy

Reasons for Non-  
Compliance: It is unsound because under 2b) it does not define the meaning of "immediate surrounding residential neighbourhoods" and furthermore does not relate to the density matrix and location classifications contained in the London Plan with regard to definitions of urban and suburban areas.

Suggested Changes: Text should be added within the policy or as a glossary of terms to define "immediate surrounding residential neighbourhoods" as those areas lying within 10 minutes (or 800m) walking distance of district hubs (such as the relationship of the site at r/o Christian Fellowship Centre on Honor Oak Road to Forest Hill district centre)

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

Reasons for  
Attendance:

Other Comments:

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Number: 5.5 Title: Paragraph ID: 2

Legal Compliance: Yes Soundness: No

Reasons for  
Unsoundness: (1) Justified (2) Effective (3) Consistent with national policy

Reasons for Non-  
Compliance: The policy allowance for only 3,190 dwellings across the remainder of the borough is unsound because it does not reflect the nervousness and uncertainty expressed elsewhere in the CS (e.g. paras 9.46, 9.47 and 9.52) regarding the deliverability of the major regeneration sites identified in Deptford, New Cross, Lewisham and Catford town centres.

Suggested Changes: The policy should provide for a more flexible distribution of housing given the acknowledged doubts regarding deliverability within the town centre areas, and the need to exceed the London Plan supply requirement. The policy should therefore allow for an unlimited housing supply uplift for 'distribution across the remainder of the borough' if these key regeneration sites fail to meet the annualised expectations of the London Plan, and be reworded accordingly.

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

Reasons for  
Attendance:

Other Comments:

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Number: 3.3 Title: Paragraph ID: 1

Legal Compliance: Yes Soundness: No

Reasons for  
Unsoundness: (1) Justified (2) Effective (3) Consistent with national policy

Reasons for Non-  
Compliance: The policy fails to recognise the important and positive role that existing residential neighbourhoods can play in terms of providing new housing land supply. This is particularly relevant to those neighbourhoods located within 10 minutes (or 800m) walking distance of town and district centres (i.e. classified as 'urban' in relation to the London Plan). Neither PPS3 or the London Plan promote the prioritisation of underused employment sites and town centres ahead of existing residential neighbourhoods as potential sources of new housing land supply.

Suggested Changes: The policy should state there is an equal necessity to review existing residential neighbourhoods to examine potential sources of housing land supply. This will avoid the premature and unwarranted prioritisation of underused employment sites and town centres ahead of existing residential neighbourhoods. This will also ensure consistency with paragraph 6.5 which supports housing in existing residential neighbourhoods immediately surrounding town / district centres.

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

Reasons for  
Attendance:

Other Comments: