

Responses to the Site Allocations Local Plan – Proposed Submission Consultation

There were 16 respondents to the consultation, giving 78 individual representations. Officers have examined the representations received and recommend that changes (Main Modifications) are made to the SALP to accommodate the representations made. The remaining comments received were either in support, comments or issues where the Council does not feel a change to the SALP is warranted. Proposed text deletions are marked using ~~strike through~~ and additions are marked in **bold and underlined**. Three respondents stated that they wished to participate at the oral examination (Milton BVI Group (SREP2); CA Planning (SREP4); and Workspace Group PLC (SREP7)).

Officers' recommended full text changes are set out in two schedules, one of main modifications (SALP1.8) and one of additional modifications (SALP1.8a).

Respondent's Name/Representation ID	Representation ID	Paragraph, Policy, Section, Figure	Comment (sound/unsound)	Summary of representation	Officers' response	Change / No change	Change number in Schedule of changes
Port of London Authority (SREP1)	SREP1.1	SA10 Sun & Kent Wharf	Unsound	i. Reference should be made to London Plan Policy 7.26 and minimising the impact of any development on the safeguarded Brewery Wharf.	Officers do not agree that the Site Allocations Local Plan (LP) is unsound. i. It is recommended that reference to the London Plan and Brewery Wharf is included.	Change - main modification	MM20
	SREP1.2			ii. Clarify what waterside access and environmental improvements are proposed. These should reflect the public right to navigate.	ii. No changes are proposed in relation to access arrangements or environmental improvements. Reference to maintaining the public right to navigate is recommended. Details regarding the nature and form of access / environmental improvements will be negotiated, submitted, assessed and		

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					determined as part of a planning application. Core Strategy policies CS12 and CS14 support a walking and cycling route in this location and Waterlink Way (cycle and pedestrian route) runs along the eastern boundary of the site, adjacent to the Creek.		
Port of London Authority (SREP1)	SREP1.3	SA11 Thanet Wharf	Unsound	Reference should be made to London Plan Policy 7.26 and minimising the impact of any development on the safeguarded Brewery Wharf.	Officers do not agree that the Site Allocations LP is unsound. Nonetheless it is recommended that reference to the London Plan and Brewery Wharf is included.	Change - main modification	MM23
Milton BVI Group (Vic Hester) (SREP2) Note: This respondent requested to attend the oral part of the examination	SREP2.1	Table 2.2 and Table 2.3	Unsound	Question whether the distinction between Mixed Use housing sites and Mixed Use employment locations is necessary.	Officers do not agree that the Site Allocations LP is unsound. Mixed use housing sites refers to the Council allocating a site for a mix of land uses, of which housing is the primary land use. Mixed Use Employment Locations are a land use designation under the Core Strategy, where a certain percentage of employment space (B	No change	N/A

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					<p>Uses) must be provided.</p> <p>No changes are proposed. The re-provision of employment uses, particularly B class uses on MELs is a key component of the release of land previously allocated as a SIL and is supported by the Lewisham Employment Land Study. Collectively the redevelopment of the MELs will provide a range of good quality premises to attract starter firms and more established businesses which will deliver major regeneration benefits for the north of the borough and in the two most deprived wards.</p> <p>Good quality business development on the MELs is key to achieving these regeneration goals whereas the mixed use housing sites are not located on land released from SIL and therefore often do not and have not contained employment uses. A wider mix of uses on the mixed use housing sites is considered appropriate.</p>		

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Milton BVI Group (Vic Hester) (SREP2) Note: This respondent requested to attend the oral part of the examination	SREP2.2	SA10 Sun and Kent Wharf	Unsound	i. Greater clarity should be provided on what is required with the development of a specific site within the wider allocation. For example, should the creative industries in the Cockpit Arms building be retained within that specific building?	Officers do not agree that the Site Allocations LP is unsound. i. No changes are proposed. The site and any uses should be considered in totality. The location of uses will be considered and negotiated as part of the planning application process.	No change	N/A
	SREP2.3			ii. Individual sites within the allocation need not come forward at the same time and should not be expected to. This should be clear as part of the masterplan for the area.	ii. It is recommended that reference to phased development is included in support of this representation.	Change – main modification	MM21
	SREP2.4			iii. Development of the site should be prioritised over other considerations that may affect viability and deliverability (such as land contamination, flooding, 50% affordable housing, Lewisham / Mayor's CIL).	iii. No changes are proposed. Viability and delivery issues are important matters that will be considered and negotiated as part of a planning application.	No change	N/A
Milton BVI Group (Vic	SREP2.5	SA10 Sun and Kent	Unsound	Compliance issues with the NPPF.	Officers do not agree that the Site Allocations LP is unsound.	No change	N/A

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Hester) (SREP2) Note: This respondent requested to attend the oral part of the examination		Wharf			Officers have undertaken a compatibility self assessment which assessed the Local Plan against the requirements of the NPPF (Submission Library document SALP1.14). The assessment showed that there are no significant differences that would effect the overall strategy.		
Andrew Wood (SREP3)	SREP3.1 SREP3.2	SA39 Tyson Road (Rear of Christian Fellowship)	Unsound	The site has significant local environmental value and should not be considered 'brownfield'. The Council should reassess the site allocation and the environmental and biodiversity value of the land in the context of the NPPF.	Officers do not agree that the Site Allocations LP is unsound. Development of this site has planning permission (granted on appeal, Ref C5690/A/09/2114438) which included an assessment of the site's biodiversity and conditions regarding safeguarding the site's ecological assets. If this permission is not implemented a new application would be required that provided an updated assessment of all impacts of the proposed scheme.	No change	N/A
CA Planning (Alban Cassidy) (SREP4)	SREP4.1	SINC 12 Hither Green Sidings	Unsound	No evidence that the site is of importance for nature conservation. Should not be designated as a SINC.	No changes are recommended. In February 2006 the Greater London Authority carried out a survey across the borough of all Sites of	No change	N/A

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Note: This respondent requested to attend the oral part of the examination					Importance for Nature Conservation. The survey recorded a range of trees and shrubs as well as amphibians and bird species. Officers consider this survey shows the importance of the site and designation is appropriate.		
Thames Water (SREP5)	SREP5.1	Paragraph 1.28	Unsound	The DPD should include a paragraph stating that developers will be required to demonstrate adequate water supply, waste water capacity and surface water drainage is available on site	Paragraph 1.28 already details this requirement. Officers recommend that text is added in relation to the separation of foul and surface flows.	Change – main modification	MM2
Thames Water (SALP5)	SREP5.2-5.35	SA1, 2, 3, 4, 5, 6, 7, 8(a), 8(b), 9, 10, 11, 16, 17, 18, 19, 20, 21, 22, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 38, 39, 42, 44	Unsound	Site specific comments relating to water and waste water capabilities on individual sites.	Officers do not consider this a matter of soundness however changes are recommended for clarity in relation to each site allocation identified. Officers agree that these site specific comments should be updated to reflect the current situation.	Change – main modification	MM5, MM6, MM7, MM8, MM10, MM14, MM15, MM16, MM18, MM19, MM22, MM24, MM26, MM28, MM32, MM34, MM35, MM36, MM37, MM41, MM43, MM46, MM48, MM50, MM51, MM52,

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							MM53, MM54, MM55, MM56, MM57, MM58, MM59, MM60
Natural England (SREP6)	SREP6.1	SINC sites	Sound	Welcomes new SINC sites and extensions to existing SINC sites	Noted	No change	N/A
Tibbalds Planning (Workspace Group PLC) (SREP7) Note: This respondent requested to attend the oral part of the examination	SREP7.1 SREP7.2	SA13 Creekside LEL, 1-17 & 2-14 Creekside, Deptford (Faircharm)	Unsound	<p>Feasibility work demonstrates that retention of the site in wholly employment uses will not secure the site's future as an employment location. A wider mix of uses, including housing, is required to support an economically viable redevelopment.</p> <p>The inclusion of the site as a location for employment uses only will not secure long term sustainable economic growth, will not allow the flexibility and adaptability required to respond to the needs and demands of the creative sector. The employment designation is not deliverable and places an unnecessary constraint on the landowner.</p>	<p>Officers to not agree that the Site Allocations LP is unsound.</p> <p>The Core Strategy Spatial Policy 2 supports the retention of Local Employment Locations and specifies that in the case of Lower Creekside this is to ensure the retention of the creative industries. The retention of the Local Employment Locations is supported by the recommendations of the Lewisham Employment Land Study.</p>	No change	N/A

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Planning Perspectives (Kier Property) (SREP8)	SREP8.1	SA25 Former Bell Green Gas Works	Unsound	The state of the market makes delivery of the indicative business/industrial floorspace unlikely. The allocation should be changed to be more flexible and reflect the latest planning application.	Officers to not agree that the Site Allocations LP is unsound. No changes are proposed. The Core Strategy sets out the maximum retail and non food retail floorspace. Any proposed changes to floorspaces will be considered as part of the planning application process. This is supported by the Lewisham Retail Capacity Study, November 2009.	No change	N/A
Royal Mail (SREP9)	SREP9.1	Blackheath Post Office	Not stated	Request inclusion of a new site, Blackheath Post Office, as an allocated site for residential or residential led mixed-use development, provided that Royal Mail's operations are relocated elsewhere.	This site was not included as an allocated site as the post office is operational and therefore the site is currently unavailable for development within the lifespan of the Site Allocations LP. Officers consider that the site could come forward as a windfall site at a later date.	No change	N/A
TfL Planning (SREP10)	SREP10.1	Paragraph 1.7	Not stated	List all other sites included in Lewisham and Catford AAPs	All allocations included as part of the Site Allocations LP will be shown on the Policies Map. Not all other sites are identified or allocated as the Catford Area Action Plan is currently	No change	N/A

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					in early drafting stages.		
TfL Planning (SREP10)	SREP10.2	Paragraph 1.29	Not stated	Reference future transport projects and the significant implications they may have on site allocations in the borough (potential Bakerloo Line and Docklands Light Railway extensions).	Reference to future transport projects and the potential implication on the allocated sites is recommended to be included as part of the LP.	Change – main modification	MM3
TfL Planning (SREP10)	SREP10.3 – 10.13	SA5, SA6, SA8(b), SA17, SA18, SA19, SA23, SA24, SA27, SA28, SA29	Not stated	The design of schemes should take account of noise and other disturbance from the railway. Adjoining development should comply with London Overground's infrastructure protection requirements.	Reference to impacts arising from the railway is recommended to be included for each of the relevant allocations. Reference to London Overground infrastructure protection is recommended to be included for each of the relevant allocations.	Change – main modification Change – main modification	MM9, MM13, MM17, MM27, MM31, MM33, MM38, MM39, MM45, MM47, MM49
TfL Planning (SREP10)	SREP10.14	SA6	Not stated	SA6 TfL should be involved in the design of any new station entrance and changes to bus stops to ensure it meets operational requirements. The allocation should refer to the retention and improvement of bus stops/stands at the site.	Reference to bus stands and stops at the site and TfL's involvement in this and the redesign of any station entrances is recommended for inclusion in this site allocation.	Change – main modification	MM11 & MM12
TfL Planning (SREP10)	SREP10.15	SA12 and others LELs	Not stated	Transport uses should be included as an appropriate use.	Local Employment Locations are defined established employment locations with established land uses	No change	N/A

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					generally falling within the B Use Classes. The allocation as a LEL does not preclude transport uses coming forward.		
TfL Planning (SREP10)	SREP10.16	SA18 Forest Hill Station		TfL involved in the design to ensure operational requirements are met. Consideration could be given to the improvement of the interchange with buses.	Reference to TfL's involvement in the redesign of any station entrances and the interchange with buses is recommended for inclusion in this site allocation.	Change – main modification	MM29 & MM30
TfL Planning (SREP10)	SREP10.17	SA25 Former Bell Green Gas works		As an out of centre retail park proposals should seek to reduce car dependency, improve public transport, cycling and walking access and promote more sustainable forms of development.	Reference to sustainable forms of transport is recommended for inclusion in this site allocation.	Change – main modification	MM40
TfL Planning (SREP10)	SREP10.18	SA26 and SA27 Brockley Cross Local Hub		TfL involved in the design to ensure operational requirements are met. Consideration could be given to the improvement of the interchange with buses.	Reference to TfL's involvement in the redesign of any station entrances and the interchange with buses is recommended for inclusion in this site allocation.	Change – main modification	MM42 & MM44
TfL Planning (SREP10)	SREP10.19	SINC 13 New Cross and New Cross Gate Railsides		An updated conservation assessment should take account of the London Overground and Thameslink works. Much of the woodland no longer exists. Network Rail and TfL should be involved in an assessment.	Officers acknowledge that ideally reviews of SINC designations should take place at least every ten years. The last review was undertaken in 2006 and therefore officers realise the importance of programming in a review by 2016.	No change	N/A

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					Although works are currently taking place the site may regenerate to be of value.		
TfL Planning (SREP10)	SREP10.20	Southern End of Bridgehouse Meadows		Presence of the Common Lizard may warrant designation as a SINC	Officers acknowledge that ideally reviews of SINC designations should take place at least every ten years. The last review was undertaken in 2006 and therefore officers realise the importance of programming in a review by 2016.	No change	N/A
TfL Planning (SREP10)	SREP10.21	C2 Silwood Triangle		Permanent development of the land is yet to take place. The site should continue to be allocated for mixed railway operations, transport, waste and B1, B2 and B8 uses	This site has been included within the Surrey Canal Road Strategic Industrial Location in the adopted Core Strategy in general conformity with the London Plan. This designation protects this site for B1, B2, B8, appropriate sui generis uses and activities that support the continued functioning of London as a whole such as waste management, transport and utilities and uses that require 24 hour functioning. Although the uses currently on site may be temporary it is considered that the SIL designation meet the requirements of TfL planning for this	No change	N/A

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					site, and a specific site allocation is not necessary.		
TfL Property (SREP11)	SREP11.1	Whole document	Not stated	No comments	Noted	N/A	N/A
English Heritage (SREP12)	SREP12.1	SA13 Creekside LEL	Not stated	Proposals should be informed through an understanding of the site's historic significance and reference to Deptford Creekside Conservation Area should be made in supporting text.	Reference to an understanding of the site and area's historic significance and the Deptford Creekside Conservation Area is recommended.	Change – main modification	MM25
Mayor's Office for Policing and Crime / Metropolitan Police Service (SREP13)	SREP13.1	Brockley Police Station Sydenham Police Station	Not stated	Proposed inclusion of these two sites for residential led, mixed-use development.	These sites were not included as allocated sites as the police stations are operational and therefore the sites are currently unavailable for development within the lifespan of the Site Allocations LP. Officers considered that the sites could come forward as windfall sites at a later date.	No change	N/A
Environment Agency (SREP14)	SREP14.1	Whole document	Sound	The SA DPD is based on a robust evidence base and the inclusion of SFRA, Sequential test and Sustainability appraisal within each allocation is welcomed.	Noted	No change	N/A
Highways Agency (SREP15)	SREP15.1	Whole document	Not stated	No comments	Noted	N/A	N/A

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Coal Authority (SREP16)	SREP16.1	Whole document	Not stated	No comments	Noted	N/A	N/A