

| Ref No. | Consultee/ Stakeholder | Response received |
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| 1 | Sport England | <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England’s guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or</p> |

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| | | <p>neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England’s Active Design Guidance: https://www.sportengland.org/activedesign</p> |
| 2 | Natural England | <p>Natural England does not have any specific comments on this draft neighbourhood plan, the Habitats Regulations Assessment (HRA) screening report, Strategic Environmental Assessment (SEA) screening report, Consultation Statement or Basic Conditions.</p> |
| 3 | Thames water | <p>As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory water and sewerage undertaker for the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document in relation to water and sewerage infrastructure:</p> <p>Water and Wastewater/Sewerage Infrastructure</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.</p> <p>Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”</p> |

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| | | <p>Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”</p> <p>Paragraph 26 of the revised NPPF goes on to state: “<i>Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary</i>”</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “<i>Adequate water and wastewater infrastructure is needed to support sustainable development</i>” (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>Policy SI5 of the new London Plan relates to water and wastewater infrastructure and supports the provision of such infrastructure to service development.</p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.</p> <p>The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.</p> <p>As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges. Information on how off site network reinforcement is funded can be found here https://developers.thameswater.co.uk/New-connection-charging</p> <p>Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:</p> <ul style="list-style-type: none"> ☐ The developments demand for water supply and network infrastructure both on and off site; ☐ The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and ☐ The surface water drainage requirements and flood risk of the development both on and off site and can it be met. |
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Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: <https://www.thameswater.co.uk/preplanning>

In light of the above comments and Government guidance we consider that the New Local Plan should include the following additional text to support Policy LP23:

PROPOSED WATER SUPPLY/WASTEWATER INFRASTRUCTURE TEXT:

“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

Policy BE1 Design of New Development

We fully support the aims of Policy BE1 (d) in relation to water efficiency, but consider that the section needs strengthening.

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:

<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Proposed policy text:

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| | | <p>“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”</p> <p>Policy HW1 Managing Flood Risk</p> <p>In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas. Flood risk policies should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the new Local Plan: <i>“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</i></p> <p>Basements – Sewage flooding</p> <p>Thames Water’s main concerns with regard to subterranean development are:</p> <ol style="list-style-type: none"> 1) The scale of urbanisation throughout London is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water’s sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network. 2) By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows. |
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| | | <p>The policy should therefore require all new basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. Clearly this criterion of the policy will only apply when there is a waste outlet from the basement i.e. a basement that includes toilets, bathrooms, utility rooms etc. Applicants should show the location of the device on the drawings submitted with the planning application.</p> <p>Comments on Site Allocations</p> <p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table provides Thames Water’s site specific comments from desktop assessments on water, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed development sites, but more detailed modelling may be required to refine the requirements.</p> <p>The Crofton Park and Honor Oak Neighbourhood plan includes the theme of ‘Meeting the challenge of climate change and flooding,’ which Thames Water is also working towards and welcomes this opportunity to engage with the Neighbourhood Forum and Lewisham about. As we continue to meet our current commitments and look towards the future, we are in the process of creating long term drainage and wastewater management plans (DWMP) with objectives that overlap with those for Crofton Park and Honor Oak. Source control sustainable drainage systems (SuDS), such as rainwater harvesting, are a key component of our plan, as well as the potential for SuDS conveyance as we reinforce and expand our network capacity. In addition to improving sewer performance, such green infrastructure could also play a role in the development of open spaces, street trees and air pollution for sites adjacent to roads. We appreciate that Lewisham is committed to a healthy environment and specifically contextualising SuDS in Crofton Park and Honor Oak.</p> <p>We recognize that housing development is increasing in density. As a general comment, the impact of brownfield sites on the local sewerage network is less than the impact of greenfield sites. This is due to the existence of historical flows from brownfield sites, as opposed to greenfield sites that have not previously been serviced. The necessary infrastructure may already be in place for brownfield development. We would therefore support a policy that considers brownfield sites before greenfield sites. This neighbourhood plan also noted the loss of and paving over of front and rear garden trees, hedges and surfaces to the detriment of green spaces and surface water management; we support the council in discouraging and not permitting this where possible.</p> <p>Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Typically, greenfield run off rates of 5l/s/ha should be aimed for using the drainage hierarchy. The hierarchy lists the preference for surface water disposal as follows; Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater direct to a watercourse > Discharge rainwater direct to a surface water sewer/drain > Discharge rainwater to the combined sewer. Discharges to combined sewers should be separate onsite and combine only prior to the final manhole before the connection. To assist in capacity assessments, all applications should include current and proposed drainage plans, including points of connection and estimations of flow rates. This is particularly important for surface water and sites with multiple points of connection. In addition to SuDS, we support the inclusion of surface water and grey water reuse within developments.</p> |
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| | | <p>As Crofton Park and Honor Oak has a predominately combined foul and surface water network, attenuation of surface water from sites where there was previously none creates room for increased foul flows as developments</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity</p> <p>There are few opportunities to disconnect surface water and discharge it into a watercourse, such as the Ravensbourne, however, there is the possibility of beginning to develop a surface water network in the area and adding surface water storage into green spaces as an amenity and water feature. These water features could overflow into the combined sewer network, but until that point would provide useful storage capacity. Such storage features could also be designed to mitigate surface water flooding risk. We would welcome a partnership with Crofton Park and Honor Oak Neighbourhood Forum, Lewisham Council and other stakeholders to explore this.</p> <p>We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.</p> |
| 4 | Transport for London | <p>We do not appear to have any record of previous consultation by the Neighbourhood Forum at the Regulation 14 stage. It is surprising that TfL was not one of the consulted stakeholder groups listed in table 6 (appendix 5) of the consultation statement. However, we do have strategic transport interests in the area and TfL is named as a potential partner for a number of potential transport projects and proposals.</p> <p>Honor Oak Park rail station is managed by London Overground and provides services on the East London Line services. Stanstead Road (A205) which forms the southern boundary of the area is an important part of the Transport for London Road Network. Brockley Rise and Brockley Road are used by a number of bus routes and provide important bus infrastructure including passenger facilities, stands and drivers' facilities. We note concerns about some of these facilities that are expressed in the consultation report. It is essential that bus infrastructure is retained and enhanced as a result of any proposed development or improvement projects.</p> <p>We have the following comments on specific policies and proposals</p> <p>T1 – Enhancement of Brockley Corridor</p> <p>We support projects that enhance the Brockley corridor where they are consistent with the Healthy Streets Approach and provide improved facilities for walking, cycling and public transport. This may need to involve traffic reduction measures and some restrictions on car parking e.g. conversion of car parking spaces to cycle parking, wider pavements, space for sitting or dining or parklets. It may not be possible for all the objectives listed in T1 to be met and indeed some may be in conflict e.g. Reduce the</p> |

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| | | <p>dominance of motor vehicles (vi) (which we would support) and (xiv) provide parking bays in appropriate locations (as parked cars can increase the dominance of vehicles)</p> <p>T2 – Pedestrians</p> <p>We support measures that improve facilities for pedestrians. Again this may involve some trade off because creating more space for pedestrians may lead to a reduction in space for vehicles</p> <p>T3 – Cyclists</p> <p>We support measures that improve facilities for cyclists including designated routes and increased cycle parking both on street and in new developments. We strongly welcome recommendation (iv) in the list of complementary actions in section 5.11.4 ‘Work with stakeholders and TfL to increase cycle parking in shopping streets, replacing car parking as necessary’</p> <p>T4 – Public Transport</p> <p>We welcome support for proposals to improve the capacity, quality and accessibility of public transport facilities in the Plan area, including at Crofton Park station, Honor Oak Park station, Brockley Rise/Honor Oak Park bus stands and Brockley Corridor bus stops. Again we stress the importance of bus infrastructure in maintaining the local bus network. There will need to be close liaison with TfL London Buses to ensure that passenger and operational facilities are retained and enhanced as a result of any proposed development or improvement projects.</p> <p>Project 5 – Brockley Corridor Improvements</p> <p>This section needs updating to reflect progress since 2017/18 in taking forward proposals for the corridor</p> <p>I hope that these comments are helpful and will be reflected in the final version of the Neighbourhood Plan</p> |
| 5 | Historic England | <p>Crofton Park and Honor Oak Park Draft Neighbourhood Plan : Regulation 16 Draft</p> <p>Thank you for consulting Historic England on the Neighbourhood Plan for Crofton Park and Honor Oak Park.</p> <p>The Government through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012) has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require Historic England, as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan. As Historic England’s remit is advice on proposals affecting the historic environment our comments relate to the implications of the proposed neighbourhood plan for heritage assets. Accordingly, we have reviewed the document against the <i>National Planning Policy Framework (NPPF)</i> and its core principle that heritage assets be conserved in a</p> |

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| | | <p>manner appropriate to their significance so they can be enjoyed for their contribution to the quality of life of this and future generations.</p> <p>Having reviewed the draft document we can offer the following observations and suggestions</p> <p>General comments</p> <p>Historic England commented in detail on the developing plan at pre-submission consultation. This is set out in the Consultation Statement and addresses the points we have raised. We do not therefore consider it necessary to provide further detailed comments. We do note however that since our original response in 2017 where we stressed the need for local heritage assets to be identified within local authority lists that there is an increasing body of neighbourhood plans which have been made which identify local heritage assets and specific character areas. While these cannot receive greater protection than under National Policy they can apply local policy. Historic England's Historic Environment Advice Note No 11 :Neighbourhood Planning and the Historic Environment (2018) gives further advice (see Section 2.4).</p> <p>https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/neighbourhood-planning-and-the-historic-environment-historic-england-advice-note-11/</p> <p>We are pleased to note the inclusion of Archaeological Priority Areas and that the Plan is now clear and well structured.</p> <p>It must be noted that this advice does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment.</p> <p>We hope these observations are of assistance in finalising this Plan.</p> |
| 6 | SGN | <p>From reviewing the Crofton Park and Honor Oak neighbourhood plan, my only comments at this time are in relation to the housing and employment site allocations. Below is a summary of my findings and a bit more information you may find of use.</p> <p><u>NETWORK OVERVIEW</u></p> <p>The domestic and employment sites found in the neighbourhood plan are in a location where the gas network is close by, so the initial physical connection to the system should not be a problem.</p> |

From my analysis I found that the impact from the site allocations have very little impact to the operation and capacity of the Intermediate Pressure (IP) and Medium Pressure (MP) gas tiers. Therefore, at this time I would not expect any reinforcement to these tiers being required as a result of each site's connection to the system.

Please note:

- Reinforcement of the existing Low Pressure (LP) network may be necessary to support development, dependant on the site gas demand and the final point of connection to SGN's network. This will usually only be known when a connections enquiry/request is made.
- SGN are unable to book capacity and the above assessment does not guarantee the availability of future capacity which is offered on a 'first come, first served basis'.
- The UK Governments plan to stop all domestic connections to the gas network post 2025 was not taken into consideration at this time, however it is worth being aware of this possible new regulation.

STATUTORY OBLIGATIONS

Where required, SGN will look to manage the provision of any off-site infrastructure improvements, in line with the overall development growth and / or timescales provided. The full extent of these works will be dependent on the nature and location of the requested load(s), potentially requiring LP reinforcement in addition to that required for the IPMP networks and will only become clear once a developer's request has been received. Reinforcement solutions are likely to involve the provision of a new pipeline in parallel to SGN's existing mains system but may also include the installation of above ground apparatus involving land purchase.

As this is a high-level assessment and response, the information provided is indicative only and should be use as a guide to assist you on your assessment. While information obtained through consultation and / or engagement on Local Development Plans is important to our analysis, it only acts to identify potential development areas. Our principle statutory obligations relevant to the development of our gas network arise from the Gas Act 1986 (as amended), an extract of which is given below:-

Section 9 (1) and (2) which provides that:

9. General powers and duties

(1) It shall be the duty of a gas transporter as respects each authorised area of his:-

- (a) to develop and maintain an efficient and economical pipe-line system for the conveyance of gas; and
- (b) subject to paragraph (a) above, to comply, so far as it is economical to do so, with any reasonable request for him -
 - (i.) to connect to that system, and convey gas by means of that system to, any premises; or
 - (ii.) to connect to that system a pipe-line system operated by an authorised transporter.

(1A) It shall also be the duty of a gas transporter to facilitate competition in the supply of gas.

(2) It shall also be the duty of a gas transporter to avoid any undue preference or undue discrimination -

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| | | <p>(a) in the connection of premises or a pipe-line system operated by an authorised transporter to any pipe-line system operated by him; and in the terms of which he undertakes the conveyance of gas by means of such a system.</p> <p>SGN would not, therefore, develop firm extension or reinforcement proposals until we are in receipt of confirmed developer requests.</p> <p>As SGN is the owner and operator of significant gas infrastructure within the area and due to the nature of our licence holder obligations;</p> <ul style="list-style-type: none"> • Should alterations to existing assets be required to allow development to proceed, such alterations will require to be funded by a developer. • Should major alterations or diversions to such infrastructure be required to allow development to proceed, this could have a significant time constraint on development and, as such, any diversion requirements should be established early in the detailed planning process. <p>SGN would therefore request that, where the Council are in discussions with developers via the Local Plan, early notification requirements are highlighted.</p> <p>Additionally, SGN are aware of the advances being made in renewable technologies, especially those related to the production of biomethane. Should any developer be proposing to include such technology within their development, then we would highlight the benefits of locating these facilities near existing gas infrastructure. Again, where the Council are in discussions with developers via the Local Plan, we would hope that these early notifications requirements are highlighted.</p> |
| 7 | WSP | <p>REPRESENTATIONS TO THE CROFTON PARK AND HONOR OAK SUBMISSION NEIGHBOURHOOD PLAN (REGULATION 16 CONSULTATION)</p> <p>We write on behalf of AA Homes and Housing to submit representations to the Crofton Park and Honor Oak Submission Draft Neighbourhood Plan.</p> <p>AA Homes owns the former Scout Hut and surrounding land on Courtrai Road which lies within the designated Neighbourhood Plan area. We would like to thank both Parish Council (PC) and Lewisham Council (SCDC) for consulting on this important plan for the area.</p> <p>We set out our representations on the plan below.</p> <p>BACKGROUND</p> <p>We are concerned that our previous representations to the Regulation 14 consultation in January 2017 (enclosed) have been disregarded and that limited changes to the Submitted Neighbourhood Plan have been made (contrary to our submissions). We have identified further issues with the plan which are also of concern and require addressing.</p> |

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| | | <p>The plan in its current form conflicts with the landowner’s aspirations for the redevelopment of the site. We wish it be drawn to the Council’s (and the independent examiner’s) attention that in our view, the plan fails the ‘basic conditions’ test (as required by paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004).</p> <p>The ‘basic conditions’ are whether the Neighbourhood Plan:</p> <ul style="list-style-type: none"> a Has regard to national policies and advice contained in guidance issued by the Secretary of State; b Has special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses; c Has special regard to the desirability of preserving or enhancing the character or appearance of any conservation area; d Contributes to the achievement of sustainable development; e Is in general conformity with the strategic policies contained in the development plan; f Does not breach, and is otherwise compatible with, EU obligations; g Meets prescribed conditions and matters. <p>GENERAL COMMENTS ON THE PLAN</p> <p>Overall, AA Homes and Housing object to the proposed Crofton Park and Submission Draft Neighbourhood Plan. We have reviewed the submitted plan and would like to offer the following comments.</p> <p>We are of the view that the submitted plan:</p> <ul style="list-style-type: none"> ▪ Does not have regard to national policies and advice (basic condition ‘a’); and ▪ Does not contribute to the achievement of sustainable development (basic condition ‘d’). <p>Our concerns regarding the basic conditions test, and the suggested changes required to the submitted plan to overcome this, are set out in detail below.</p> <p>Policy GS4 Protection of Sites of Importance for Nature Conservation</p> <p>We are pleased to see the removal of the proposed designation of a Local Nature Reserve on land at Eddystone Bridge given that the Joint Nature Conservation Committee explicitly states that, “<i>under the National Parks and Access to the Countryside Act 1949 LNRs may be declared by local authorities after consultation with the relevant statutory nature conservation agency</i>”.</p> <p>In the revised policy, in general we are supportive of protecting the green corridor and green spaces along the railway as AA Homes and Housing understand the significance of green spaces and the importance they play in benefits for the community. However, the NPPF, Planning Practice Guidance and local planning policy all provide guidance and policies aimed at conserving and enhancing the natural environment; additional policy within the Neighbourhood Plan is unnecessary and restrictive and therefore does not accord with basic condition ‘d’.</p> <p>AA Homes and Housing would be open to discussion with the Neighbourhood Plan Forum on the benefits of developing part of the site for essential housing and managing the northern area for open green space to link to the environmental aspirations of the plan.</p> <p><i>Ecological value</i></p> |
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| | | <p>The site has low to moderate ecological value with the exception of some roosting opportunities provided for bats in the trees on site. The findings are typical for a suburban site and not befitting of special protection.</p> <p>The site is therefore not ecologically species rich and the sites primary ecological value as part of this plan is associated with its position within the Forest Hill to New Cross Gate railway cutting that provides a green linkage between the greener suburban outskirts of London and more central areas. The protection of the whole site to meet the needs of the green aspirations of the plan are unmerited.</p> <p>We therefore object to Policy GS4 because the site is not of sufficient ecological value for additional protection beyond that already provided by policy and suggest it is removed. Again, the policy is restrictive and goes against the principles of sustainable development and basic condition 'd'.</p> <p>Policy GS3 Designation of Three Peaks Green Walk</p> <p>We are pleased to see that the alignment of 3 Peaks Green Walk as shown to be amended does not go through private land.</p> <p>The site owned by AA Homes and Housing is directly to the south of this proposed walk and is currently fenced off and not publicly accessible. The site will remain as such until the site can be developed into a modest housing scheme. AA are looking to work with the Neighbourhood Forum to provide an area of accessible space that would link into the 3 Peaks Green Walk on development of the site which would wholly be in line with the green aspirations of the plan.</p> <p>As explicitly stated in the policy, streetscape and public realm improvements will be promoted along connecting streets with improved pedestrian crossings, wayfinding, tree planting and the promotion of the features of interest and views with opportunities should be taken to improve access to green spaces and key places on the route. Given the site is located on a key view, development of the southern end of the site and management and improvement of a green space to the northern side should be welcomed by the Forum.</p> <p>Policy C1 Protection and Enhancement of Community Facilities to meet local needs</p> <p>We object to the Scout Hut building and adjoining land at Courtrai Road being designated as a Community Facility under Policy C1.</p> <p>The Core Strategy policy and NPPF offer sufficient control over the potential loss of community facilities and there is no need to introduce a new policy in the Neighbourhood Plan.</p> <p>Page 13 of the Neighbourhood Plan lists five issues regarding community facilities. It claims that existing community facilities may be vulnerable unless they are afforded greater protection, particularly with Local Authority funding constraints and potential pressures for change of use/redevelopment'. However, there is no evidence that the existing policy framework provided at a local and national level is failing to protect important community facilities within the designated Neighbourhood Plan area. It further states that there is a 'need to ensure that all groups have adequate access to facilities', the site in question is not publicly accessible and hasn't been for some time given it is private ownership.</p> |
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| | | <p>Policy C1 is worded poorly and will not be able to be used for sound, consistent land-use planning and therefore goes against condition 'a'. Firstly, there is no indication as to how to test that 'the use no longer serves the needs of the community'. Secondly, it will be very different to test and assess whether there is 'adequate alternative provision' for certain community facilities, particularly when the community facility in question is used was last used as a small denomination church rather than the wider general public.</p> <p>Policy C2 Redevelopment of Sites in Existing Community Use</p> <p>Policy C2 sets out that redevelopment or intensification of sites in existing community use may be permitted subject to development proposals making appropriate on-site provision for community facilities and where this would be in compliance with other policies. The site in question at Courtrai Road is no longer in community use and has been vacant for some time.</p> <p>Policy C2 will unnecessarily hinder some development opportunities by requiring equivalent provision of community facilities either onsite or elsewhere even despite the fact some community facilities are no longer in use such as at Courtrai Road. The policy therefore goes against the principles of sustainable development and fails to meet basic condition 'd'. Page 4</p> <p>Policies C1 and C2 are inconsistent with each other. For example, if the four criteria of C1 are complied with, there will be no reason for equivalent provision being provided either on-site or off-site as set out in C2.</p> <p>Project 4 Protection and Enhancement of Forest Hill to New Cross Railway Cutting Corridor</p> <p>This community aspiration seeks to increase the nature conservation and preservation of the Green Corridor and of the designated SINC either side of Eddystone Road bridge which will include measures to secure designation of part of the area as an additional Local Nature Reserve (albeit as noted above the Neighbourhood Plan cannot create a nature reserve itself).</p> <p>Natural England defines a Local Nature Reserve as a protected area of land designated because of its local special natural interest and where possible, educational and community value. Local Nature Reserves can help safeguard rare and also more common, locally valued species, habitats and geodiversity, and should be designated for areas of reasonable natural interest and of high value locally. On this basis, the site does not feature the criteria deemed necessary to be allocated as a Local Nature Reserve; the site does not demonstrate that it has a presence of ecological high value (except for common nesting birds).</p> <p>Overall, it presents low to moderate ecological value. Designation of the site as a Local Nature Reserve is therefore unmerited.</p> <p>It should be noted that the site is in private ownership. There is no lease or agreement in place that gives any other body control of the land. We object to this project on the basis that it incorrectly and unjustifiably proposes Local Nature Reserves. Moreover, there is no grounds for seeking statutory protection of the land owned by AA Homes and Housing.</p> <p>AA Homes and Housing would be willing to work with the Neighbourhood Forum to develop part of the site for a green space through contributions gained by a modest housing development on southern side of the site. This proposal would see a declining and disused site be improved and managed through high quality development and a dedicated green space linking with other aspirations such as the 3 peaks green walk.</p> |
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| | | <p>CONCLUSION</p> <p>Overall, in summary we are of the view that the Neighbourhood Plan is not in conformity with the basic conditions, specifically in regard to national policies and advice (basic condition 'a') and contribution to the achievement of sustainable development (basic condition 'd').</p> <p>The Neighbourhood Plan needs to be amended to:</p> <ul style="list-style-type: none"> ▪ Delete Policy GS4; ▪ Amend Policy C1 and C2 to remove any reference to the Scout Hut being designated as a community facility given it is vacant and not accessible to the community; ▪ Amend Policy C1 and C2 so that they are consistent and so that their requirements are fair, reasonable and testable; and <p>As such the plan as submitted should be revised and amended ahead of being considered by an examiner and proceed towards a referendum. AA Homes and Housing are willing to work with the Forum to develop a plan that considers land owners and the aspirations of their land whilst also considering benefits for the wider community.</p> <p>We request these representations are taken into consideration and forwarded to the independent examiner. We also request that we are notified regarding the decision on the proposed plan and</p> <p>We also request that we are notified regarding the decision on the proposed plan and details of the Examination as we may wish to attend hearing sessions in support of the plan if required.</p> |
| 8 | Blythe Hill Action Group | <p>Please find below the thoughts and responses to the Neighbourhood Plan. Having engaged on this with Kay Pallaris way back in 2016. It seems staggering to me that our corner of the ward is almost entirely ignored. We have emailed, called, petitioned and pushed for years and it is disheartening to say the least that the plethora of problems that this less affluent corner of the ward remain unrecognised and unaddressed. This has to change.</p> <p>BLYTHE HILL SHOPPING PARADE:</p> <p>Unlike the commercial hubs in neighbouring Crofton Park, Brockley Rise and Honor Oak Park that have seen substantial investment, the down-trodden Blythe Hill parade on Stanstead Road or "Stan's dead Road" as it's now known, has been overlooked for decades. There is now a desperate need for improvements to the public realm and streetscape to include substantial planting, seating, lighting and a sheltered/re-positioned bus stop.</p> <p>As a result of the lack of investment and the failure to tackle the toxic congestion going into Catford, the shopping parade's dowdy demeanour has failed to entice any appealing shops and/or foster a balanced set of commercial outlets that is of use to our community. The offer of 2 nail bars, 2 off-licences, 3 fried chicken shops, a second-hand fridge dealer and a funeral monuments</p> |

business does constitute a balanced neighbourhood retail offering to Shop Local. The fact that our parade is one of the few parades in the ward/borough that aren't emblazoned with 'Shop Safe - Shop Local' banners speaks volumes.

Apart from the Post Office, this stretch of Stanstead Road doesn't offer a single everyday amenity that the hundreds upon hundreds of local residents and young families desperately need. As a result, even before the pandemic, this section of the A205 is a windswept ghost town. This CANNOT be ignored any longer. Indeed, the outrage of the proposal to grant permission to a residential developer to demolish the historic Victorian plant showroom at 294 Stanstead Road into a handful of flats has provoked local residents to take a stand. Especially as, it's emerged that numerous viable retail proposals had been made about the property whilst it was To Let/For Sale only to be ignored by the agents in pursuit of the developer's goal to convert the building to residential. Three much-loved local businesses that had previously expressed interest in the site have widespread local support for their proposals to turn it into a neighbourhood cafe/restaurant and coffee roastery that will preserve the commercial nature and architectural heritage of the building.

<https://www.change.org/p/save-this-historic-building-and-call-for-investment-in-our-local-parade>

RAT-RUNNING AND TRAFFIC FLOW NORTH OF THE SOUTH CIRCULAR between Brockley Rise and Ravensbourne Park:

We believe firm and decisive action must be taken now to tackle this. Please find below an outline of suggestions and priorities

Ravensbourne Road has recently been partially repaved (despite numerous disabled residents and a care home further up the street not benefitting from the first pavement upgrade in many decades and the fact the poor condition of the pavement is equally hazardous all the way up to the junction with Blythe Hill/Sunnyside and beyond. This is an important thoroughfare as it's the principal walking route to neighbouring streets and Blythe Hill Fields from the parade of shops and bus-stop on the South Circular.

- Yellow lines should be added to the dangerously obstructed bends and three blind corners on Ravensbourne Road where it meets Blythe Hill/Sunnyside and Montem Road.
- A raised section should be installed near where Ravensbourne Road and Blythe Hill/Sunnyside meets to create a safe crossing from the South Circular to/from Blythe Hill Fields ... and/or other traffic-calming measures that are deemed suitable.
- It is obvious that the lower section of Blythe Hill Lane is entirely unsafe for pedestrians and residents, as an incredibly narrow two-way road cannot rely on a single narrow pavement. There is new housing on one side of the road that has no pavement at all and the pavement on the other side of the road is rendered useless by the cars that park or mount the kerb (to allow for passing traffic). As the most direct line of access from the South Circular up to Blythe Hill Fields (and notably from family-friendly Blythe Hill Tavern and Moon Lane Ink children's bookshop). This road sees an incredible amount of footfall, which includes a lot of young children and babies in buggies forced to walk in the middle of the road and take a chance with the two-way traffic. It is incredible that this stretch of road has not already seen a string of accidents.

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| | | <p>According to the owners of the car mechanics workshop, there have been several near-misses. It is our view that the lower section of Blythe Hill Lane (from Blythe Hill/Sunnyside to Stanstead Road) should be pedestrianised.</p> <ul style="list-style-type: none"> • A feasibility study to see if our neighbouring streets could be access-only. We will continue to see a preference for car use due to people's unease about COVID and public transport use. This October ULEZ comes into force. Ravensbourne Road will be on the ULEZ boundary - meaning we are likely to see a further increase in traffic flow problems as cars that comply with the regulations peel off onto Ravensbourne Road & neighbouring streets seeking alternate route to avoid this congested stretch of the South-Circular. As such there has never been a better time for a unified, cross-departmental approach to address the present/future traffic flow issues and promote safe walking/cycling in this neighbourhood. <p>finally ...</p> <p>THIS TOXIC STRETCH OF THE SOUTH CIRCULAR:</p> <ul style="list-style-type: none"> • The bumper-to-bumper traffic on this stretch of the Stanstead Road that trickles into Catford needs to be addressed. This section of road is on the outer edge of three neighbouring ward/constituency boundaries and as a result it seems the problems here haven't been tackled in a unified way for many years - the streetscape is thoroughly depressing - there's zero greenery to mitigate against toxic fumes from the idle traffic, a poorly positioned bus stop without a shelter, bins permanently strewn across the pavement and a mature tree that's died. This has been a bottleneck on the South Circular for decades. Whether it is, as Simon Moss suggested, the awkward position of the bus-stop by the zebra-crossing, the layout of the St. Dunstan's traffic island/bus stands or the phasing of the jumble of traffic lights outside St. Dunstan's College (17 sets of lights in a 20 metre radius). The problems with this stretch of the Stanstead Road/South-Circular and its impact on the neighbouring primary schools, families/residents and businesses needs an urgent and holistic approach if the three neighbouring wards, neighbouring constituency MPs, Mayor of London/TfL and Lewisham Council are to continue to take their noble campaign to combat toxic air seriously. That is why we are now teaming up with Choked Up, https://twitter.com/ChokedUp_UK?ref_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Eauthor and Climate Action Lewisham https://climateactionlewisham.org/ to take this to the next stage. <p>We look forward to engaging with you constructively to put the Blythe Hill end of the ward at the centre of the revised Neighbourhood Plan.</p> |
| 9 | Resident | <p>Response to the Neighbourhood Plan</p> <p>As a resident of Ravensbourne Road, I am writing to express my thoughts (alongside other responses from my neighbours) about the plan. I have written regularly to many of you over the years to highlight many of the problems in this part of the ward. Local democracy flourishes with dialogue, engagement and being heard - which are further challenges to the more material issues we face.</p> |

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| | | <p>Our road has become a rat run, traffic and pollution hazard. Often cars are damaged by lorries using the road. The pollution is terrible and there are many young families on the road. Walking to school and nursery is becoming more and more unpleasant, with both noise and air pollution being a problem. More greenery would be a starting point for more holistic thinking about the traffic in the area.</p> <p>The repaving of the road, is only partial and the remaining pavement is in poor condition. Access and use of pushchairs is difficult on the street. The street is used as a main access road to the park (Blythe Hill Fields) and would benefit from pavements being improved.</p> <p>Finally, the shopping parade. As a local resident I would love to see more investment in the parade. the addition of Moon Lane Books to the Blythe Hill Tavern has been fantastic. Again, the pollution and traffic on the road here are a hinderance to the development of a really superb family space where outdoor seating and planters could be added. There has recently been discussion about the increasing about of planning being given, against locals wishes - for the LED advertising board and for more flats at 294 Stanstead Road. Not only does this make us feel unvalued and apathetic about local democracy but also prevents the development of local amenities, which we need and would use.</p> |
| 10 | Resident | <p>I am writing to stress our desire to be included rather than excluded from the local plan.</p> <p>Please improve the parade of shops on Stanstead road that are home to the Blythe Hill Tavern and Moon Lane Books. This area is in desperate need of investment and an injection of attention, TLC and funding</p> <p>Please plant more trees and greenery on this parade and the surrounding area including Ravensbourne Road / Sunnyside.</p> <p>Please put in place much needed traffic calming measures / ban lorries with height and or weight restrictions on the rat run from Catford Bridge Station via Montacute road, Polstesd Road, Ravensbourne Park Crescent and Ravensbourne Park to stop HGVs driving through these incredibly tight streets and (more often than not) getting immobilised on the corner of Sunnyside Blythe Hill and Ravensbourne Road. We tend to have an HGV stuck on this corner at least once a week and a car on the corner struck and damaged at the same frequency. We have repeatedly written to councillors/tfl/MPs about this with no joy.</p> <p>Please put a plan and incentives in place to attract new , more diverse businesses to this parade. Do not exclude us from your plans.</p> <p>Please consider this stretch for funding to spruce up shop fascias (as you plan to do on Brockley Rise)</p> <p>Please please please repave the rest of ravensbourne road as the repaving was cut short unnecessarily and has left elderly, disabled and young children resident here with reckless paving to navigate outside their homes. Only last week I tripped over a paving slab on Ravensbourne road with my 6 month old daughter strapped to my chest in the sling. She was forward facing and hit the pavement with me on top of her. I had to take her to A&E for cuts and bruises to her face. This is a direct result of Lewisham short-sightedness</p> |

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| | | <p>and cost cutting when repaving only the smallest of stretch of this road, despite it being a well used pedestrian thoroughfare to Blythe Hill Fields that is very demonstrably in a state of disrepair.</p> <p>The old book keepers here would make an excellent coffee shop servicing families of children at Rathfern and Kilmore schools and those visiting Moon Lane Books. We do not need to cram in any more resident to an area already saturated with HMOs and a dire lack of amenities, facilities and parking for the existing residents as it is. This building should not be flats but should be of service to the existing residents already in the area.</p> <p>In summary, please please please do not leave our parade of shops and our streets neglected as you focus attentions on Brockley Rise.</p> |
| 11 | Resident | <p>I write to echo concerns that the parade at 295-341 Stanstead Road has been excluded from the Corfton Park and Honor Oak neighbourhood plan. While the nearby "Brockley Rise/Stanstead Road parades" are singled out as an area in need of regeneration (NC3), almost nothing is offered for my local area, despite it being in far greater need of help.</p> <p>This parade is run down and faces serious litter, pollution and traffic issues. Many families live in the area and there are three popular primary schools nearby. They need your support.</p> <p><u>THE PROBLEMS:</u></p> <p><u>1. Local residents feel underserved by the shops</u>, many of which stand empty. There are three chicken shops within a 250m stretch whose customers generate a large amount of litter on local roads. There are too many off licences, a funeral monuments business and a nail bar, yet nowhere to buy fresh groceries . Residents prefer to drive elsewhere to shop.</p> <p><u>2. There are serious litter issues.</u> Bins get out of control and there is a history of flytipping on Stanstead and Ravensbourne Road . The council does little despite repeated complaints</p> <p><u>3. There is a lack of greenery on Stanstead Road</u> and the streetscape needs upgrading to entice business/ lift the area's spirits.</p> <p><u>4. Local roads like mine are used as a cut through for traffic from the South Circular.</u> It's dangerous and articulated lorries regularly get stuck and damage cars. The council says it can't even afford to put up a sign banning lorries.</p> <p><u>5. The South Circular creates a large amount of pollution</u></p> <p><u>SOLUTIONS</u></p> <p><u>1. We need more incentives for people to open businesses in the retail units that stand empty</u> on Stanstead Road. We also need more direction from planning to ensure a <u>more diverse range of shops</u> that serve residents' needs. We really need a supermarket and a decent cafe . No more chicken shops!</p> |

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| | | <p>The former William Hill betting shop - one of the only retail units big enough to house a supermarket or cafe - is being turned into flats despite three popular local businesses (a coffee business, sourdough pizza firm and coffee roasters) offering to take over the ground floor. That makes no sense.</p> <p>2. Engage more social enterprises. There is already a popular independent children's bookshop called Moon Lane Ink which is run as a social enterprise. Could we ask the Ten Thousand Hands charity to open a site on Stanstead Road? It runs the popular cafe in Ladywell fields,</p> <p>3. The council should spruce the up the parade to attract new businesses . We need more trees - how about some of the planters you recently put on Brockley Road by Crofton Park station? We need better litter control and better shop fascias, which is what you propose for the NC3 "local improvement area" nearby</p> <p>4. We need better traffic calming measures on the South Circular and local roads. You should make Ravensbourne Road one way or block it off at the South Circular end. We need signs on local roads banning lorries.</p> <p>5. Measures to tackle pollution . Again we need a concerted effort to plant more trees on Stanstead Road to combat pollution</p> <p>I have copied in the Blythe Hill Action Group , our residents' association, which is fighting to plant trees, calm traffic, and battle fly-tipping and anti-social behaviour. However, our efforts will only go so far without council support.</p> <p><u>Can the parade at 295-341 Stanstead Road please be included in the Draft Crofton Park and Honor Oak neighbourhood plan and considered as part of the NC3 LIA? It is wrong to ignore it.</u></p> |
| 12 | Resident | <p>I would like to contest and reject a proposal outlined in the HopCroft Neighbourhood Plan (attached), specifically point 5.5.3 Housing Site Allocation (page 39) – SA1 Land at Whitbread Road (allocated for residential development)</p> <p>The proposed development would negatively impact me as an owner-resident of an adjoining property, it is likely to restrict the light that reaches my property, it will limit access to my property, and would have an unacceptable impact on our amenities, parking and open public spaces.</p> <p>The existing space could be much better used in a number of ways:</p> <ol style="list-style-type: none"> 1. Electric vehicle charging points could be installed in the current parking lot to encourage residents to adopt electric vehicles, especially as most residents do not have a private parking space outside their property, and as the ULEZ is expanding to cover this postcode. 2. The fenced green spaces could be turning into more open, communal green spaces to aid biodiversity in the area and provide a mini park for the local community 3. Improved amenity (bin) storage units could be installed <p>I hope you will listen to the protests of local residents and reject the proposed development.</p> |

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| 13 | Resident | <p>I would like to oppose a proposal outlined in the HopCroft Neighbourhood Plan, specifically point 5.5.3 Housing Site Allocation (page 39) – SA1 Land at Whitbread Road (allocated for residential development)</p> <p>The proposed development would negatively impact me as an owner-resident of an adjoining property at 310 Brockley Road.</p> <p>The new building is likely to restrict the light that reaches my property, and it will limit access to my property. This would also have an unacceptable impact on our local amenities, parking and open public spaces as these are key parts of the infrastructure adjoining our property.</p> <p>The existing space could be much better used in a number of ways:</p> <ol style="list-style-type: none"> 1. Electric vehicle charging points could be installed in the current parking lot to encourage residents to adopt electric vehicles, especially as most residents do not have a private parking space outside their property, and as the ULEZ is expanding to cover this postcode. 2. The fenced green spaces could be turning into more open, communal green spaces to aid biodiversity in the area and provide a mini park for the local community 3. Improved amenity (bin) storage units could be installed <p>I hope you will listen to the protests of local residents and reject the proposed development.</p> |
| 14 | Resident | <p>I live on Ravensbourne Road, at the southern end of the area covered by the plan, and was really disappointed to see that the proposed 'NC3' local improvement area will not cover the parade on Stanstead Road near where I live.</p> <p>These shops, stretching from 295 to 341, are shabby, run down and in serious need of support. Yet they do not fall under the scope of the new Catford town centre regeneration plan and are completely ignored in the Draft Crofton Park and Honor Oak neighbourhood plan.</p> |

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| | | <p>Local residents feel totally underserved by this parade, where many shops stand empty, a situation worsened by Covid. There are three chicken shops within a 250m stretch, whose customers generate a large amount of litter and which pump out noxious smells day and night.</p> <p>There are three off licences and two newsagents, yet nowhere to buy fresh food (unless you count the chicken shops and the run-down builders' café).</p> <p>Many of the shops get little trade because the demographics of the surrounding roads have changed and local residents prefer to drive elsewhere to get what they need, such as the Sainsbury's hypermarket in Sydenham.</p> <p><u>There are important exceptions which highlight what we need more of:</u></p> <p>We have a colourful independent children's bookshop called Moon Lane Ink, which is loved by local parents and run as a social enterprise. The Blythe Hill Tavern pub - which I am glad is recognised as an important community facility in your plan - is a gem.</p> <p>Before Covid the Van Dough stone baked pizza van, run by a local resident, would pull up outside the pub from Thursday to Saturday each week, offering locals really nice fresh food. I'm sure it will be back.</p> <p>There is also a useful Post Office, a dry cleaners and dentist's - but everything else feels unloved and uncared for.</p> <p><u>In general we need four things in this part of Stanstead Road to make it better:</u></p> <ol style="list-style-type: none"> 1. More incentives for people to open businesses in the units that stand empty and perhaps try out new ideas. What about some social enterprises? 2. More direction from planning to ensure we get a more diverse range of shops. We could really use a local supermarket selling fresh food such as Jay's Budgens in Crofton Park. There should be a more varied and healthy range of food outlets - <u>no more fast food shops please, they send the wrong message to kids</u>. We need a decent cafe serving coffee, I guarantee there would be huge demand. What about encouraging small businesses who need a shop front (a surveyor's or architect's) to open up – businesses that will at least keep fascias looking nice. 3. Help from the council to spruce the up the parade with more trees, better litter control (bins regularly overflow and look awful) and better shop fascias, which is what you plan to do in the NC3 local improvement area nearby 4. Measures to tackle the heavy pollution and traffic of the South Circular, which add to the general sense of malaise and shabbiness of the area and which impact the many children who live locally <p>This area of Forest Hill/ Catford is socially diverse, with people who have lived here for decades rubbing shoulders with upwardly mobile young families who are increasingly moving into the homes on both sides of the South Circular. It continues the trend seen across Forest Hill and Honor Oak.</p> |
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| | | <p>There are two outstanding schools nearby, Rathfern and Kilmorie, and some lovely roads and parks. There is a community atmosphere. But if you want local amenities you have to walk or drive 10-15 minutes to Honor Oak, Catford town centre or Forest Hill. There is almost nothing nearby.</p> <p>I have copied in the Blythe Hill Action Group, a residents association I am a member of, which is trying to improve the area by fundraising to plant more trees, fighting for traffic calming measures, and battling fly-tipping and anti-social behaviour.</p> <p>Almost anyone you talk to will tell you that the parade at 295-341 Stanstead Road needs help. 20 to 30 years ago there was a baker's, a framing shop, a butcher's. Today, despite the growing interest in Blythe Hill Fields as an up-and-coming part of Lewisham, it is a rag bag of failing shops, not the vibrant community high street it should be.</p> <p>More worryingly, the parade seems to be on no one's radar at the council. <u>Can this stretch of Stanstead Road please be included in the Draft Crofton Park and Honor Oak neighbourhood plan and considered as part of the NC3 local improvement area?</u> It makes no sense to ignore it.</p> <p>Could you also advise how we might go about changing this neighbourhood ourselves? How can we promote this parade to young businesses/ social enterprises looking to try out new ideas? How can we tackle issues like pollution and a lack of trees?</p> |
| 15 | Blythe Hill Action group (second submission) | <p>Please can you include the parade fo shops on Stanstead Road between Ravensbourne Road and Montem Road as a Local Improvemnt Area.</p> <p>Moon Lane Books has injected some much needed community into the site and with encouragement empty units like the old bookmakers and unit next to the chicken shop could be encouraged into useful social, family and community spaces like a much needed child friendly healthy cafe.</p> <p>We also desperately need traffic calming measures on Ravensbourne Road / Sunnyside. Please see below notes from the Blythe Hill Action Group:</p> <p>Dear All,</p> <p>I hope this email finds you all well. I'm writing in my capacity as Co-Chair of The Blythe Hill Action Group and have addressed this email to you all as our previous efforts to engage and highlight the issues haven't resulted in any meaningful action.</p> <p>In short, the flow of traffic in our area is dangerous, the traffic-calming measures are inadequate and the impact of the constant congestion on this stretch of the South Circular is extremely detrimental to health and well-being. Whilst we're grateful for the help and support that we've garnered from a number of sources - including but not limited to Simon Moss, Vicky Foxcroft, Jonathan Fish, Cllr Louise Krupski, James Taylor at Sustrans, Cllr Sophie Davis, Alexandra Crush and Team Catford, meaningful action has yet to be taken and we're at a loss what to do next.</p> |

TO SUMMARISE THE ISSUES:

Ravensbourne Road, Blythe Hill/Sunnyside and Blythe Hill Lane are extremely narrow, congested and receive a torrent of traffic from cut-throughs.

All these tiny roads are subject to two-way traffic, despite bumper to bumper/corner-to corner parking on both sides of the road.

The worst part of the affected area is home to six blind corners.

In total, this 40 metre stretch has three dangerous T-junctions (one with Ravensbourne Road and one-way Montem Road, one with Bankhurst Road and Blythe Hill/Sunnyside and a third where Ravensbourne Road and Blythe Hill/Sunnyside meet. Notwithstanding, the hazardous 4-way crossroads with the incredibly narrow Blythe Hill Lane).

The worst pinch point is Ravensbourne Road and Blythe Hill/Sunnyside - an incredibly busy rat-run with speeding cars mounting blind corners and insufficient traffic-calming measures.

This route is subject to constant sat-nav shortcuts and as a result we have all too frequent problems with HGVs stuck on this corner and heavy flows of traffic flying around narrow, blind, densely-packed roads with heavy footfall - this is the main access route to Blythe Hill Fields from the South Circular on foot.

The depressing/toxic nature of this consistently congested stretch of the South Circular into Catford due to a series of issues identified by Simon Moss and Louise Krupski on their site visits.

EVIDENCE:

[https://urldefense.com/v3/ https://www.dropbox.com/sh/4b0xerfwfve4u0u/AAD4yL1nYLNsbxLvletvYqMa?dl=0 ;!!CVb4j_0G!EpDwL9hGMYTPi_EchUW5NOeBX5LK9Bn-r4nf49_zNJxZ7vURb-GO9-dbUOCT00JPd7zLXPjUGMcP\\$](https://urldefense.com/v3/https://www.dropbox.com/sh/4b0xerfwfve4u0u/AAD4yL1nYLNsbxLvletvYqMa?dl=0;!!CVb4j_0G!EpDwL9hGMYTPi_EchUW5NOeBX5LK9Bn-r4nf49_zNJxZ7vURb-GO9-dbUOCT00JPd7zLXPjUGMcP$)

[https://urldefense.com/v3/ https://www.dropbox.com/sh/qe45ciuomg8zhtn/AADlvhxDL2iNPFNpEO5aj4lDa?dl=0 ;!!CVb4j_0G!EpDwL9hGMYTPi_EchUW5NOeBX5LK9Bn-r4nf49_zNJxZ7vURb-GO9-dbUOCT00JPd7zLXKKBE1Z6\\$](https://urldefense.com/v3/https://www.dropbox.com/sh/qe45ciuomg8zhtn/AADlvhxDL2iNPFNpEO5aj4lDa?dl=0;!!CVb4j_0G!EpDwL9hGMYTPi_EchUW5NOeBX5LK9Bn-r4nf49_zNJxZ7vURb-GO9-dbUOCT00JPd7zLXKKBE1Z6$)

[https://urldefense.com/v3/ https://www.dropbox.com/sh/kipvx5k5g95a4xx/AAA3X_10INjzdP92qFQ0u5v1a?dl=0 ;!!CVb4j_0G!EpDwL9hGMYTPi_EchUW5NOeBX5LK9Bn-r4nf49_zNJxZ7vURb-GO9-dbUOCT00JPd7zLXGRYugS6\\$](https://urldefense.com/v3/https://www.dropbox.com/sh/kipvx5k5g95a4xx/AAA3X_10INjzdP92qFQ0u5v1a?dl=0;!!CVb4j_0G!EpDwL9hGMYTPi_EchUW5NOeBX5LK9Bn-r4nf49_zNJxZ7vURb-GO9-dbUOCT00JPd7zLXGRYugS6$)

PLEASE SEE THIS DROPBOX LINK FOR:

PHOTOS AND VIDEOS OF THE DANGEROUS BLIND CORNERS, INSUFFICIENT TRAFFIC CALMING, PERMANENT CONGESTION, LACK OF MITIGATING GREENERY AND EXAMPLES OF CAR DAMAGE.

OUR CORRESPONDENCE TO DATE WITH SOME OF THOSE CC'D ABOVE FINDINGS AND RECOMMENDATIONS FROM (FORMER) SERVICE GROUP MANAGER FOR HIGHWAYS AND TRANSPORT, SIMON MOSS - FOLLOWING A SITE VISIT IN MAY 2019.

THE RESPONSE & RECOMMENDATIONS OF JAMES TAYLOR AT SUSTRANS

SOLUTIONS:

We believe firm and decisive action must be taken now. Please find below an outline of suggestions and priorities as discussed with various parties cc'd above.

Ravensbourne Road has recently been partially repaved (despite numerous disabled residents and a care home further up the street not benefitting from the first pavement upgrade in many decades and the fact the poor condition of the pavement is equally hazardous all the way up to the junction with Blythe Hill/Sunnyside and beyond. As aforementioned this is an important thoroughfare as it's the principal walking route to neighbouring streets and Blythe Hill Fields from the parade of shops and bus-stop on the South Circular. Now the partial repaving work is complete, we were informed by Tony Ajala on Wednesday that the long-awaited resurfacing of the carriageway will commence in mid-September. Therefore we would request that these first four key priorities are carried out in conjunction with the upcoming works as a matter of urgency ...

Immediate priorities:

Adding a greater number of steeper speed humps to prevent the extremely hazardous speeding down the hill on Ravensbourne Road.

Yellow lines added to the dangerously obstructed bend and three blind corners on Ravensbourne Road where it meets Blyth Hill/Sunnyside and Montem Road.

The repainting of no-parking lines outside every driveway to facilitate passing points on this very busy two-way road.

A raised section installed near where Ravensbourne Road and Blythe Hill/Sunnyside meets to create a safe crossing from the South Circular to/from Blythe Hill Fields ... and/or other traffic-calming measures that are deemed suitable.

Further priorities:

We also urgently need a series of height/weight restrictions to prevent countless HGVS from taking this route from Ravensbourne Park ie Ladywell/Catford (coming from the east) and from Brockley Rise (to the west) as a well-established South-Circular shortcut (Please see Pinch Points and Traffic Flow in 'PHOTOGRAPHS') We have HGVS stuck on the Ravensbourne Road and Blythe Hill/Sunnyside junction at least once a week. This usually involves residents coming out onto the streets, trying to coordinate car-owners to relocate their cars to help HGVS reverse and complete the turn around the corner. At least once per month a car is irrevocably damaged by an HGV that has no choice but to keep attempting the turn, as there's no route back. PLEASE SEE THE DROPBOX VIDEOS FOR EVIDENCE OF THIS.

It is obvious that the lower section of Blythe Hill Lane is entirely unsafe for pedestrians and residents, as an incredibly narrow two-way road cannot rely on a single narrow pavement. There is new housing on one side of the road that has no pavement at all and the pavement on the other side of the road is rendered useless by the cars that park or mount the kerb (to allow for passing traffic). As the most direct line of access from the South Circular up to Blythe Hill Fields (and notably from family-friendly Blythe Hill Tavern and Moon Lane Ink children's bookshop). This road sees an incredible amount of footfall, which includes a lot of young children and babies in buggies forced to walk in the middle of the road and take a chance with the two-way traffic. It is incredible that this stretch of road has not already seen a string of accidents. According to the owners of the car mechanics workshop, there have been several near-misses. It is our view that the lower section of Blythe Hill Lane (from Blythe Hill/Sunnyside to Stanstead Road) should be pedestrianised.

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| | | <p>A feasibility study to see if our neighbouring streets could be access-only. We will see a further increase in car traffic due to people choosing their cars over public transport in the coming weeks and next April ULEZ comes into force. Ravensbourne Road will be on the ULEZ boundary - meaning we are likely to see a further increase in traffic flow problems as cars that comply with the regulations peel off onto Ravensbourne Road & neighbouring streets seeking alternate route to avoid this congested stretch of the South-Circular. As such there has never been a better time for a unified, cross-departmental approach to address the present/future traffic flow issues and promote safe walking/cycling in this neighbourhood.</p> <p>The bumper-to-bumper traffic on this stretch of the Stanstead Road (or 'Stans Dead Road' as it's now known locally) that trickles into Catford needs to be addressed. This section of road is on the outer edge of three neighbouring ward/constituency boundaries and as a result it seems the problems here haven't been tackled in a unified way for many years - the streetscape is thoroughly depressing - there's zero greenery to mitigate against toxic fumes from the idle traffic, a poorly positioned bus stop without a shelter, bins permanently strewn across the pavement and a mature tree that's died. This has been a bottleneck on the South Circular for decades. Whether it is, as Simon Moss suggested, the awkward position of the bus-stop by the zebra-crossing, the 'At-Any-Time' nature of the bus lane or the lay-out of the St. Dunstan's traffic island/bus stands or the phasing of the jumble of traffic lights outside St. Dunstons College (17 sets of lights in a 20 metre radius). Please see the viral video of the near-constant traffic jam in the Drop Box link. The problems with this stretch of the Stanstead Road/South-Circular and it's impact on the neighbouring primary schools, families/residents and businesses needs an urgent and holistic approach if the three neighbouring constituencies, Mayor of London/TfL and Lewisham Council are to continue to take their noble campaign to combat toxic air seriously.</p> <p>If what is needed for the council to be able to take action is an independent report, then James Taylor at Sustrans is already familiar with the myriad problems here. He/Sustrans stands ready to undertake a review for the council if this is deemed necessary. Although, as Simon Moss's email/site visit demonstrated - it is patently obvious to anyone who visits the area the problems we face.</p> <p>What we need now are solutions to tackle the very real and present dangers posed by the hazardous waves of traffic in this area. We have been incredibly grateful for the sympathy we've received regarding our plight, but what we need now is someone to spearhead action. We need a council representative and/or someone at Highways or Environment & Transport as well as a representative from TfL to start work on a unified approach to tackling these issues.</p> |
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