

## Schedule of Proposed Modifications

Modification reference	Part	Section, policy, or paragraph	Proposed Modification ( <del>deleted text in strikethrough</del> , <u>new text underlines</u> )	Reason for change
<b>General comment</b>				
MO 01	1	General – Site nomenclature	<p>Please Note: In preparing these documents for public consultation, LBL Planners have not cross referenced the sites referred to in the latter above policy / schedule and plans with their references in the earlier site allocation policies, as <b>needed for easy navigation and reference by the public</b>. Each “<i>Tall Building Suitability Zone</i>” plan in the <b>Proposed Changes to the adopted Policies Map Section 14</b> should be given a Plan Number, and each site within each plan a reference number which is the same as appears elsewhere in the Local Plan for site allocations. That is BASIC TOWN PLANNING CONSULTATION necessity which has been omitted.</p> <p>Accordingly, for the avoidance of doubt, the two sites in respect of which these CGRA representations are made are as follows:  <b>LLP Policies Map: “Catford”</b> plan: within this, the site is the one referenced in the <b>LLP Schedule 12: Tall Building Suitability Zones Table 21.12</b> as: “<i>Laurence House and Civic Centre with Rushey Green Telephone Exchange : 12 Storeys</i>”</p> <p>This site appears in <b>LLP Section 14 Lewisham’s Central Area Figure 14.4 Site Allocation Plan</b> with a number but also a slightly different title as: “<i>Site 19 Laurence House and Civic Centre</i>”</p> <p><b>LLP Policies Map: “Bellingham”</b>: referenced in the <b>LLP Schedule 12 Table 21.12</b> as: “<i>Ravensbourne Retail Park: 10 – 12 Storeys</i>”</p> <p>This site appears in <b>LLP Section 14 Lewisham’s Central Area Figure 14.4 Site Allocation Plan</b> as: “<i>Site 22 Ravensbourne Retail Park</i>”</p> <p>Can future consultation please refer to a site consistently with one reference number and name.</p>	Suggest that the Council explore the identified inconsistencies in site nomenclature and amend accordingly. These can be introduced as minor modifications.
MO 02	1	General	The Council will consider modifications to supporting text at Paragraphs 3.18 – 3.21 to make clear reference to the wider partnership relationships critical to the delivery of strategic infrastructure improvements	<p>The Council welcomes the support provided by the London Borough of Bexley. The Council remains committed to working on strategic planning issues with its partners in neighbouring local planning authorities. Within this context the Borough notes the suggestion that explicit reference be made to such partnership working arrangements within the new Local Plan itself.</p> <p>Although the Council does not consider this an essential matter of soundness, it does acknowledge that it could provide the reader with an improved understanding of the wider partnership relationships that are critical to the delivery of new infrastructure networks.</p>
MO 03	1	General Paragraphs 3.18 – 3.21	The Council will consider modifications to supporting text at Paragraphs 3.18 – 3.21 to make clear reference to the wider partnership relationships critical to the delivery of strategic infrastructure improvements.	<p>The Council welcomes the support provided by the London Borough of Bexley. The Council remains committed to working on strategic planning issues with its partners in neighbouring local planning authorities. Within this context the Borough notes the suggestion that explicit reference be made to such partnership working arrangements within the new Local Plan itself.</p> <p>Although the Council does not consider this an essential matter of soundness, it does acknowledge that it could provide the reader with an improved understanding of the wider partnership relationships that are critical to the delivery of new infrastructure networks.</p>

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MO 04	1	Page 7	Delete Page 7 of the plan	Unnecessary as the event has already passed
MO 05	1	Pg 18 Fig 1.2	Key Stages of Plan making process – review and update the dates in the image	Dates in this version need to be reviewed to reflect new timeline.
<b>Preface</b>				
MO 06	1	Photograph caption Page 8	Refurbished railway arches at Deptford Rise, part of a <del>council</del> <u>Council</u> project which includes the restoration of an historic Victorian carriage ramp and creation of a new public square with a mix of commercial spaces.	Capitalisation of proper noun.
<b>Chapter 2 – Lewisham Today and Planning Ahead</b>				
MO 07	1	Chapter 2	Subject to them being demonstrably necessary to ensure soundness, the Council will consider amendments to Chapter 2 to include references to health and provision of the required social infrastructure to support planned-for growth. If required, these amendments will be agreed with the NHS Trust and brought forward through the modifications process.	<p>The Council notes and welcomes the broadly supportive comments made in relation to the new Local Plan Chapter 2 Lewisham Today and Planning Ahead.</p> <p>The Council acknowledges the importance of health and wellbeing in its totality, and supporting healthcare infrastructure networks, to terms of successful place-shaping and plan-making. The new Local Plan has been prepared with the health and wellbeing of existing and future residents as a common thread that runs through its entirety. Equally, the new Local Plan seeks to address the investment and provision of necessary supporting infrastructure networks in a similar fashion. The Council considers this to be a sound approach.</p> <p>Nevertheless, the Council could consider expanding the text in Chapter 2 to include references to health and provision of the required social infrastructure to support planned-for growth. These additions, should they be shown necessary to ensure soundness, could be brought forward through the modifications process.</p>
<b>Chapter 3 – Vision, Strategic Objectives and the Spatial Strategy</b>				
MO 08	2	Strategic Objectives	Objective 21 Consider suggested amendment –	Objective 21
		Objective 21	“Work in partnership with central government, the Greater London Authority, Transport for London, Network Rail and other stakeholders to reduce car use, <u>increase active travel</u> , and...”	The Council acknowledges the importance of active travel and that it falls within the scope of this Strategic Objective. The Council will consider the proposed amendment.
MO 09	2	Policy OL 01	<p>It is suggested that the Council could, In the interest of resolving the GLA’s stated concern, consider a modification to Policy OL1 that sets out the quantum of planned-for growth – new housing, employment, retail and other floorspace. This could be proposed as a major modification. Introduction of this modification would be subject to reaching agreement with the GLA through a SoCG.</p> <p>The Council could consider a new sub section at the end of Chapter 3 – from new Paragraph 3.28 onwards. This addition could include a new table that clearly sets out the quantum of growth proposed through the new Local Plan for the individual Opportunity Areas, Regeneration Nodes, Growth Nodes, Town Centres, District and Local Centres etc.</p>	

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MO 10	2	Policy OL 01 C iii.	“iii. Ensure the District Centres at Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross and Sydenham retain their <del>distinctive-character</del> <u>distinctive character</u> whilst evolving in their function as key hubs of community, cultural and commercial activity;”	Correct typographic error
MO 11	2	Policy OL 01 Para 13.7 – 13.8	In the interest of resolving the respondent’s stated concern the Borough Council could consider a modification to Policy OL 01 that sets out the quantum of planned-for growth – new housing, employment, retail and other floorspace.	<p>The Council notes the comments made in relation to these supporting text paragraphs.</p> <p>Although it is unclear what the intention of the comments is, it is assumed that the respondent is suggesting that the new Local Plan has not been positively prepared – specifically, that the text at this point does not set out a strategy that as a minimum, seeks to meet the area’s objectively assessed needs.</p> <p>The new Local Plan must be read in its entirety. The new Local Plan’s overarching vision and strategy is set out under Part One Planning for an Open Lewisham. Further detail on how the delivery of planned-for growth will meet the Borough’s needs is set out under Policies OL 01, HO 01 and EC 02.</p> <p>The purpose of Para 13.7 and 13.8 is to provide the reader with a summary of anticipated growth being delivered from planned-for site allocations. It is not intended for these paragraphs to provide an overview of the wider spatial strategy. On that basis no further action is considered necessary.</p>
<b>Chapter 5 – High quality Design</b>				
MO 12	2	QD 01 F	Well-functioning and resilient places F Development proposals must be well-integrated within their neighbourhood. They must provide a positive and coherent relationship with all land uses and spaces within the site and its surroundings having <del>r4egard</del> <u>regard</u> to:	Correct typographic error
MO 13	2	QD 03 F	F Development proposals should deliver a vibrant public realm that promotes opportunities for relaxation, social interaction and physical activity for people of all ages and abilities. They should seek to create welcoming environments that attract people into public spaces and encourage their enjoyment within them during different times of the day and night, and throughout the year. This includes consideration of how the local microclimatic impacts on people’s health and comfort. Development proposals must make provision for public realm that is appropriate to the <del>uses(s)</del> <u>use(s)</u> involved along with the location, nature and scale of development, including consideration for:	Correct typographic error
MO 14	2	QD 03	Local Plan Policy QD 03 Paragraph 5.23 Consider suggested amendment –  “Development proposals are also encouraged to refer to the Government’s Manual for Streets <u>and Transport for London’s Streetscape</u> guidance...”	<p>The Council notes the comments and welcomes the support for the new Local Plan Policy QD 03.</p> <p>The Council notes the suggested amendment to Paragraph 5.23. The Council will consider the proposed addition.</p>
MO 15	2	QD 04	Consider amending the wording at Policy QD 04 C to reflect the supporting text - <u>Although maximum heights are provided for each for the Tall Building Suitability Zones, proposals will still be expected to include robust design justifications for the heights proposed, including testing in key views.</u>	<p>The Council welcomes Historic England’s support in relation to the new Local Plan Policy QD 04.</p> <p>The Council also notes the comments made in relation to the wording of new Local Plan Policy QD 04 C, which sets out how the approach to tall new buildings will be applied at different locations across the Borough. The Borough notes the suggestion that the policy may benefit from clarification. The Council</p>

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				acknowledges that this specific issue is addressed within the associated supporting text paragraph (Paragraph 5.33).
MO 16	2	QD 04	Amend Figure 5.1. Amend the extent of the tall building suitability designation in accordance with the submitted comments.  Consider amendments to supporting text Paragraph 5.34 in response to the submitted comments. The modified text could read –  “Impacts include those in the building’s immediate vicinity, surrounding area and elsewhere in London, <u>particularly in relation to places in neighbouring Boroughs</u> ”.	The Council notes the comments made in the representation and welcomes the London Borough of Bromley’s support for new Local Plan Policy QD 04.  The Council notes the identified error to Figure 5.1, which appears to show the tall building suitability designation extending beyond the Borough boundary into Bromley.  The comments made in relation to supporting text Paragraph 5.34 are also noted.
MO 17	2	QD 05	Policy QD 05  “C Development proposals <del>must</del> <u>should</u> not harm and, <del>wherever possible,</del> <u>should</u> seek to make a positive contribution to the characteristics and composition of London Strategic Views and Lewisham Local Views, including their protected vistas and landmark elements.”	The Council could consider a modification to the policy wording to ensure consistency – should that be demonstrably necessary to secure soundness.
MO 18	2	QD 06  Para 5.44	“5.44 Development proposals must demonstrate how they will deliver the optimum capacity of a site. The optimum capacity is one that is derived through careful consideration of density taking into account the site’s local character, the types of uses proposed, access to public transport and the infrastructure available to support the development. The optimum capacity is not the maximum capacity or density. <u>The indicative capacities identified for the site allocations provide a starting point for this process and are not intended to be a cap on potential development quantum.</u> Development proposals should provide evidence of an options appraisal...”	Subject to it being demonstrably necessary to ensure the soundness of the new Local Plan Policy QD 6, suggest that Paragraph 5.44 be amended through the modifications process as follows –
MO 19	2	QD 12	f. There is no harmful impact on trees, especially those with Tree <del>Protection</del> <u>Preservation</u> Orders (TPOs).	Correct error in nomenclature.
MO 20	2	QD 12  Paragraph 5.94	Advertisements, digital displays and hoardings are regularly located on or adjacent to the public realm. To ensure that everyone can move safely and easily within it, development must apply inclusive and safe design principles. Where installations are proposed to be located on or adjacent to the Transport for London Road Network. TfL should be consulted for an opinion on the safe operation of the highway network.	Correct/introduce punctuation.
<b>Chapter 6 - Heritage</b>				
MO 21	2	HE 01  Photograph Caption Page 135	Opposite: Horniman Museum <del>extension and museum extension</del> , Forest Hill (Allies and Morrison / Peter Cook)	Correct factual description
MO 22	2	HE 01  Paragraph 6.15	The NPPF sets out policies for ‘enabling development’. This is a term specifically used for cases where the cost of repair - and conversion to optimum viable use, if appropriate - of a heritage asset exceeds its market value on completion of repair or conversion, allowing for appropriate development costs (termed a ‘conservation deficit’) <sup>2</sup> . In these cases development proposals	Correct typographic error
MO 23	2	HE 02 F	“F Development proposals involving the demolition of buildings or structures that make a positive contribution to the character or appearance of a Conservation Area will <u>normally</u> be resisted. <u>Proposals that robustly demonstrate that new replacement buildings or structures make a greater positive contribution to the Conservation Area and outweigh the potential harm of demolition will be considered on their merits.</u> ”	Subject to it being demonstrably necessary to ensure soundness, the Council could consider an amended wording to the new Local Plan Policy HE 02 F –
MO 24	2	Schedule 2 Table 21.2	On the section relating to London Squares, I have sent information that a London Square on Taymount Rise is absent from the Council's list and this should be included now.	Determine whether the identified site is a designated heritage asset.  Subject to it being a designated heritage asset consider its addition to Table 21.2 as a minor modification (omission).

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MO 25	2	Figure 6.1	Add Registered Parks and Gardens to figure 6.1	Figure 6.1 needs amending to reflect the correct designated heritage assets.
MO 26	2	Figure 6.2	Remove Registered Parks and Gardens from figure 6.2.  Add Locally Listed Buildings to Figure 6.2.	Figure 6.2 needs amending to reflect the correct non designated heritage assets.
MO 27	2	Figure 7.8	Amend map to show that the whole borough is covered by an HMO Article 4.	Figure 7.8 needs amending as the whole of the borough is now covered by confirmed Article 4s. The Article 4 for the southern wards is already in force and the remainder of the borough will coming into force in January 2024.
<b>Chapter 7 – Housing</b>				
MO 28	2	Small site hosing opportunities map	Add explanation to say sites that fall outside of those allocations may also be suitable for small site intensification. Conversely it does not provide an automatic right to develop small sites within these zones. Each site needs to be considered on its merits and in line with all of the policies, taking the plan as a whole.	Current map is ambiguous with current explanation.
MO 29	2	HO 01	A a. The London Plan ten-year target is <del>exceeded</del> <u>sought</u> through the delivery of <del>at least</del> 16,670 net housing completions during 2019/20 to 2028/29 (equivalent to 1,667 p.a.) and	Updated to reflect latest changes to the Housing Trajectory and Appendix 6.
MO 30	2	HO 01	A b. The NPPF 15-year target is exceeded through the delivery of at least <del>27,730</del> <u>28,460</u> net housing completions from the anticipated start date of the local plan, <del>2023/24 to 2037/38</del> <u>2024/25 to 2038/39</u> (equivalent to 1,667 net completions p.a. plus additional completions during the first five years to cater for the current backlog ( <del>461</del> <u>579</u> p.a.) and the application of a 5% buffer ( <del>83</del> <u>112</u> p.a.)).	Updated to reflect latest changes to the Housing Trajectory and Appendix 6.
MO 31	2	HO 01	B The Council will keep under review the Local Plan's strategic housing target and performance against <del>the delivery of this.</del>	Correct grammar.
MO 32	2	HO 01 Para 7.2	...For Lewisham, the 10-year strategic housing target for the period 2019/20 to 2028/29 is 16,670 net housing completions (equivalent to 1,667 net completions p.a.). <u>The supply of housing during the 10 years is likely to fall short of the target, due to a variety of external factors such as stalled sites, applications being re-submitted for consented schemes and an under supply of 3,471 housing completions during years 2020/21 to 2022/23 compared to the London Plan annual target. To rectify this, the backlog associated with the latter will be catered for by the end of the first 5-year period (2028/29).</u> The London Plan ... Accordingly the 5-year target from the anticipated start date of the plan in <del>2023/24</del> <u>2024/25</u> – is <del>11,060</del> <u>11,790</u> and the 15-year target is <del>27,730</del> <u>28,460</u> net housing completions. This is equivalent to 1,667 net completions p.a. plus additional completions during the first five years to cater for the current backlog ( <del>462</del> <u>579</u> p.a.) and to provide a 5% buffer ( <del>83</del> <u>112</u> p.a.).	Updated to reflect latest changes to the Housing Trajectory and Appendix 6, and the latest housing completions survey 2023.
MO 33	2	HO 01 Para 7.4	The Local Plan identifies specific site allocations which have the potential capacity to deliver <del>24,413</del> <u>24,928</u> net new homes over the lifetime of the Plan. When combined with other large consented sites and the trend based windfall delivery rates in the Borough, there will be sufficient capacity to exceed the <del>10-year London Plan target and the</del> NPPF housing target over a five and 15-year period...	Updated to reflect latest changes to the Housing Trajectory and Appendix 6.
MO 34	2	HO 01	Whilst the approach suggested by the respondent to resolve their concerns relating to Small Sites is unnecessary and churlish, the Council could consider modifications to Policy HO1, or its supporting text (Paragraph 7.2) in order to refer to the small sites OAHN figure.	The Council notes and welcomes the supporting comments made in relation to new Local Plan Policy HO 01 in respect of the approaches towards under-delivery and the strategic target for new affordable housing.  Table 4.1 The Council assumes that the respondent's comments relate to the "expiry" of the London Plan target during the new Local Plan period. The expiration of the London Plan target technically allows the Borough Council to recalibrate the Borough's OAHN figure. The respondent appears to suggest that is what the Local Plan should do – suggesting that the Borough's OAHN figure could under those circumstances decrease. The Council considers this to be counterintuitive.  For clarity, the NPPG clearly sets out how local planning authorities will in their plan-making support the Government's

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				<p>objective of significantly boosting the supply of homes. The NPPG is clear that plan-making bodies are expected to have regard to the guidance in preparing and updating their assessments. Where they depart from the guidance, it will be important to explain the reasons for doing so when setting out the evidence base that informs the plan. Assessment needs to be thorough but proportionate, building where possible on existing information sources outlined within the guidance. Although not explicit, the NPPG implies that the Borough's OAHN figure is a starting point that moves in one direction – upwards.</p> <p>Within this context the respondent's comments are unhelpful. The approach taken by the Council seeks to maintain the positive upwards trajectory for delivering new homes across Lewisham. It is a continuation of the existing strategy. Deviating from the London Plan target (beyond 2029) exposes the new Local Plan to unnecessary scrutiny and risk. Not least is the possibility that a theoretical lower OAHN figure runs counter to the London Plan, which may have a higher target.</p> <p>More pertinently, NPPF Para 33 provides sufficient flexibility for this matter to be addressed without recourse to the suggested approach.</p> <p>“Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.”</p> <p>Furthermore, it is worth noting that the proposed new planning system will introduce transition arrangements (for local plans) that effectively give the new Local Plan a finite lifespan until 2029/30. Coupled with NPPF Para 33 this addresses this representation.</p> <p><b>Small Sites</b> The Council acknowledges that small sites can make a valuable contribution towards significantly boosting housing supply. The importance of small sites towards meeting housing supply is reflected by the new Local Plan Policy HO2.</p> <p>For clarity, the London Plan's baseline target for supply from small sites is engrossed within the housing need targets identified under new Local Plan Policy HO1. It is unclear from the representation why the desegregation of this target is a matter of soundness. The Council considers that the new Local Plan Policy HO1 is clear in identifying the source of the housing need target and those reading the new Local Plan can refer to the London</p>

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				Plan for further information. The Local Plan monitoring regime will disaggregate the different sources of supply providing further clarity.
MO 35	2	HO 02 Para 7.20	7.20 The Local Plan seeks to ensure provision for a wide range of housing types and tenures to meet local need, including need arising from families. The conversion of larger and <del>single-family</del> <u>single-family</u> homes into flats has in recent years provided a small source of housing supply in Lewisham. Whilst recognising that conversions support delivery towards the strategic housing target, it is important that provision for family accommodation is not compromised. The Local Plan therefore sets out requirements to ensure that family sized units (3+ bedrooms) are retained when residential conversions come forward. <del>The Lewisham</del> <u>The Lewisham</u> SHMA (2022 shows there is an acute need for family housing.	Correct grammar and typographic error.
MO 36	2	HO 03 Para 7.36	The Lewisham <del>SHMAA</del> <u>SHMA</u> (2022) raises issues around the affordability of First Homes in the context of local median household incomes...	Correct spelling of acronym/ abbreviation.
MO 37		HO 03	Paragraph 7.24 – “For genuinely affordable homes, we will seek that residents are provided with lifetime tenancies, ideally in perpetuity. <u>The tenants of intermediate tenure products will be provided tenancy protection through the relevant law and policy.</u> ”	Affordable Housing  Agree the following amendment to the supporting text on technical grounds
MO 38		HO 05	Paragraph 7.52 Consider the suggested amendment -  “Developments must also make adequate provision for access, parking and servicing for vehicles, with drop-off points for taxis, mini-buses and ambulances located near the building’s principal entrance. <u>Parking must not exceed the maximum set out in Policy TR4 (Parking).</u> ”	<b>Paragraph 7.52</b>  The Council notes the suggested amendment to Paragraph 5.23. The Council will consider the proposed addition.
MO 39	2	HO 08 Para 7.72	7.72 New HMOs should contribute positively to their local area, and must not result in a harmful overconcentration of HMOs.	Correct typographic error – delete double full stops.
MO 40	2	HO 08	Paragraph 7.75 – “...Applicants will be required to submit robust evidence of market demand in the Borough for the type of provision proposed, along with evidence to demonstrate that the development will not result in a proliferation of purpose-built shared living in the Borough. <u>The required evidence will comprise...</u> ”  <b>The modified paragraph will need to include a specification of the evidence required to support this application – to be agreed through the examination process.</b>	Subject to it being demonstrated as being necessary for the purpose of soundness, the Council could consider a modification that provides a specification of the of evidence required to support proposals for large-scale shared accommodation.
<b>Chapter 8 – ECONOMY AND CULTURE</b>				
MO 41				
MO 42	2	EC 04 D	Affordable workspace should be provided on-site. <del>Off-site</del> Off-site provision will only be acceptable where it is demonstrated to the satisfaction of the Council that on-site provision is not feasible or off-site provision will achieve greater economic benefits.	Correct typographic error – delete double full stops.
MO 43	2	Figure 5.1	Tall Buildings Suitability Plan  Show land to north of Achilles Street as being included within an appropriate location for tall buildings, so that the boundary reflects that shown in Lewisham’s North Area Site Allocation 13 Achilles Street	Figure 5.1 needs amending to reflect the correct site allocation boundary.
MO 44	2	EC 07 Para 8.39	8.39 Mixed-use Employment Locations ( <u>MELs</u> ) consist largely of older, poorer quality and redundant industrial land and buildings.	Amend supporting text paragraph to include acronym/ abbreviation for Mixed-use Employment Locations.
MO 45	2	EC 6 A and EC 2 B	“Development proposals should <del>ensure that there is no net loss of</del> <u>retain existing</u> industrial capacity within these locations and seek to deliver net gains wherever possible.”	<b>Consistency between Policy EC 6 A and Policy EC 2 B</b> Suggest that the Council consider an amendment to policy wording to ensure consistency between the two policies –
MO 46	2	Table 8.1	Bermondsey Dive Under should show dual designation of SIL and LSIS.	Table 8.1 needs amending to show the correct employment land designation status for this site.
MO 47	2	Para 8.61	“...and opportunities facing the <del>Hhigh</del> <u>High</u> Street...”	To rectify typing error
MO 48	2	EC 09	<b>Paragraph 8.52</b>	Paragraph 8.52

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			Consider the suggested amendment –  “Applicants will be expected to consult Network Rail and Transport for London on development and design options in order to ensure there is no adverse impact on the public highway and rail network, or preclude <u>prejudice or delay</u> the delivery of planned transport infrastructure, including the Bakerloo line extension.”	The Council notes the suggested amendment to Paragraph 8.52. The Council will consider the proposed addition
MO 49	2	EC 11 Para 8.61	8.61 There is a need to ensure that town centres remain resilient and adaptable to the challenges and opportunities facing the <del>Hhigh</del> <u>High</u> Street, including changes in consumer behaviour and business practices.	Correct spelling/ typographic error – “High Street”
MO 50	2	EC 11	The Council notes the comments made in relation to the new Local Plan Policy EC 11 and its supporting text.  The new Local Plan addresses heritage matters through general borough-wide policies that are set out under Chapter 6 Heritage. These are comprised of Policies HE1 Lewisham’s historic environment, HE2 Designated Heritage Assets, and HE3 Non-Designated Heritage Assets. Although these do not explicitly address the conservation of historic character within town centres, they do provide a sound borough-wide approach. Nevertheless, the Council could consider addressing the respondent’s comments through modifications to the supporting text – potentially cross-referencing to Chapter 6 Heritage.	Consider modifications to the supporting text that refer to the requirements set out under the policies contained in Chapter 6 Heritage.
MO 51	2	EC 18 Para 8.100	8.100 <del>Placeholder—supporting text to be included (covering strategic approach and protection / loss of cultural venues)</del>	Insert correct text – current Reg 19 version includes placeholder text.
<b>Chapter 9 – Community Infrastructure</b>				
MO 52	2	CI 01 C b.	b. There are realistic proposals for replacement provision of an equivalent or improved standard that will continue to meet the needs of the neighbourhood and wider community <del>;</del> or	Correct typographic error – delete two superfluous commas.
MO 53	2	CI 01  Paragraph 9.1	“Community infrastructure is also commonly referred to as social infrastructure. It covers a range of services and facilities that contribute towards inclusive and sustainable neighbourhoods and communities by providing residents and visitors with opportunities to enjoy a good quality of life. Community infrastructure includes provision for health services, education and training, community facilities (including public houses), <u>cultural facilities</u> , places of faith, and sport and recreation facilities for people of all ages and abilities. Green infrastructure is also a component of social infrastructure, although it is addressed separately in this Local Plan.”	Amend the new Local Plan Policy CI 01 Paragraph 9.1 to read – Paragraph 9.1 –
MO 54	2	CI 02  Para 9.10	...Proposals will be refused where they do not suitably demonstrate that the development is designed to support the long-term viability of the community use, whether as a standalone building or part of a mixed use development. <del>.</del>	Correct typographic error – delete superfluous full stop.
MO 55	2	CI 04 Para 9. 20	...Where it is proposed to incorporate a nursery or childcare facility within an existing self-contained (Class C3) property, this must not result in the loss of a dwelling unit. <del>.</del>	Correct typographic error – delete superfluous full stop.
<b>Chapter 10 – Green Infrastructure</b>				
MO 56	2	GR 01 Para 10.3	The protection and enhancement of green infrastructure in Lewisham is necessary to support the London Plan objective to make London at least 50 per cent green by <del>2050</del> <u>and 2050</u> and to support its National Park City status.	Correct typographic error – introduce space between words.
MO 57	2	GR 01	“ <b>...Development proposals must protect and seek to enhance provision of green infrastructure across the Borough, including by improving or creating new links between its different elements. <u>Development resulting in the loss of irreplaceable habitats (such as Ancient Woodland or veteran trees) will normally be refused unless there are demonstrable exceptional reasons and a suitable compensation strategy exists.</u></b> ”	Amend new Local Plan Policy GR 1 A to incorporate –
MO 58	2	GR 02 Para 10.7	An additional open space study was prepared in 2022, which provides evidence to inform appropriate land-use designations and policies to protect and sensitively manage open and green spaces within the <del>borough</del> <u>Borough</u> .	Capitalise proper noun – Borough.
MO 59	2	GR 03 E	E Development proposals should seek to secure Biodiversity Net Gain ( <u>BNG</u> ).	Introduce acronym/ abbreviation.



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MO 60	2	GR 03 Para 10. 18	10.18 The Environment Act 2021 introduces provisions for Biodiversity Net Gain ( <u>BNG</u> ).	Introduce acronym/ abbreviation.
MO 61	2	GR 03	<b><i>"They must also protect and conserve <u>irreplaceable habitats, protected and priority habitats, and species that sit outside of the SINC network, with reference to the London Environment Strategy.</u>"</i></b>	Amend new Local Plan Policy GR 03 B to read –
MO 62	2	GR 03	<i>"Development proposals must seek to avoid harm to and protect biodiversity as well as maximise opportunities to enhance the value of habitats wherever possible. <u>For example, this could include, where appropriate, integrated bird, bat and bee bricks, hedgehog highways and reptile refugia/log piles...</u>"</i>	Amend the new Local Plan Policy GR 03 Paragraph 10.13 to read –
MO 63	2	GR 03 Paragraph 10.13	<i>"Applicants <u>must refer to the latest Lewisham Biodiversity Action Plan, currently A Natural Renaissance for Lewisham (2021), which sets out information on the vision and opportunities for the borough including consideration for potential requirements for important species features such as swift bricks which are not included in the Biodiversity Net Gain calculation.</u>"</i>	Amend the new Local Plan Policy GR 03 Paragraph 10.13 to read –
MO 64	2	GR 05 Para 10.32	10.32 ...Considerations may include: planting plans with species, frequency of maintenance operations such as weeding, irrigation and the use of hydration bags for trees, checking stakes and ties, plant condition, mowing times for long grass sward areas, materials and minimising hard surfacing, details of building subsidence and other liabilities such as climate change resilient foundations within zone of influence of trees, permeable surfacing and <del>SUDs drainage</del> <u>Sustainable Drainage Systems</u> ,	Remove acronym/ abbreviation and replace with full descriptor - as it only appears once under this policy.
<b>Chapter 11- Sustainable Design</b>				
MO 65	2	SD 06 Para 11.32	11.32 In addition to AQMAs there are also 10 <del>Air Quality Focus Areas (AQFAs)</del> <u>AQFAs</u> in the Borough.	Replace full descriptor as acronym/ abbreviation already introduced.
MO 66	2	SD 08	SD8 Sustainable Drainage  <i><u>"G Development industry partners are responsible for making proper provision for surface water drainage to ground, water courses or surface water sewer. Proposals for new provision will not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</u></i>	The Council to consider the following addition to the new Local Plan Policy SD 08 Sustainable Drainage through the modifications process –
MO 67	2	SD 08 Para 11.48	11.48 New development must contribute to minimising and mitigating flood risk through the use of Sustainable Drainage Systems ( <u>SuDS</u> )	Introduce acronym/ abbreviation – SuDS.
MO 68	2	SD 08	The Council to consider the following addition to the new Local Plan Policy SD 08 Sustainable Drainage through the modifications process –  SD8 Sustainable Drainage  <i><u>"G Development industry partners are responsible for making proper provision for surface water drainage to ground, water courses or surface water sewer. Proposals for new provision will not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</u></i>	The Council notes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy SD 08 Sustainable Drainage.  The Council acknowledges that securing appropriate sustainable drainage provision forms a key component towards managing the impact of future growth across the Borough. The Council remains committed to facilitating the necessary partnership relationships that must exist between development industry and infrastructure delivery partners, and the planning authority. To that end, the Council will consider the suggested amendment to the new Local Plan Policy SD 08 Sustainable Drainage through the modifications process.
MO 69	2	SD 09  Figure 11.4	Amend new Local Plan Policy LNA SA 01 Paragraph 15.6 Development Guidelines to include a new sub-paragraph –  New text –  <i><u>"Development proposals in proximity to the safeguarded Convoys Wharf must take into account potential future wharf operations in accordance with the Agent of Change Principle and London Plan policy SI15"</u></i>  Amend Figure 11.4 key to read –	The Council notes the comments and broad level of support offered in relation to the new Local Plan Policy SD 09 Lewisham's Waterways.  The Council has considered the suggestion that supporting text Paragraph 11.59 be amended to make more specific reference to the agent of change principle to ensure that new developments are designed to minimise the potential for conflicts of use and

Modification reference	Part	Section, policy, or paragraph	Proposed Modification ( <del>deleted text in strikethrough</del> , <u>new text underlines</u> )	Reason for change
			<del>Proposed Safeguarded Area</del> <u>Confirmed Safeguarded Wharf Boundary</u>	<p>disturbance between residential and waterway activities. The Council concludes that it would be inappropriate to amend the specific supporting text as suggested. However, the Council does believe it is appropriate to consider similarly worded additions to Policy LNA SA 01 Paragraph 15.26 Development Guidelines as an alternative solution.</p> <p>The Council notes and acknowledges the factual position in respect of the safeguarded status of Convoys Wharf.</p>
MO 70	2	SD 10	<p>Paragraph 11.63 “Thames Water record <u>reported</u> sewer flooding incidents by postcode area and this information should be referred.”</p> <p>Paragraph 11.68 “New residential development must meet the London Plan standard for mains water consumption, which reflects the Optional Requirement set out in Part G of the Building Regulations. <u>All new residential developments (including replacement dwellings) will meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, using the ‘Fittings Approach’ in table 2.2 as set out in Building Regulations part G2. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.</u> Major non-residential development must meet BREEAM excellent standard for the ‘Wat 01’ water category, to achieve at least a 12.5% improvement over defined baseline performance standard. In addition, major developments and high or intense water use developments (such as hotels) should include a grey water and rain water harvesting system, and applications must provide robust justification where this is not considered feasible. Planning conditions will be used to ensure water efficiency targets are met.”</p>	<p>The council to consider introducing a minor modification to the supporting text under Paragraph 11.63 to reflect the factual position –</p> <p>The Council to consider additional wording to the supporting text set out under Paragraph 11.68 through the modifications process</p>
MO 71	2	SD 12	Consider a modification to the new Local Plan at supporting text Paragraph 11.77 to include an appropriate factual reference to the City of Westminster and how it interacts with the wider South East London Joint Waste Planning Group. The wording in the supporting text of the new Bexley Local Plan – at Paragraph 6.83, may provide a model for the modification.	The Council welcomes and notes the comments raised by the City of Westminster. This is not considered to be a matter of soundness for the new Local Plan. Nevertheless, in the interests of maintaining a positive partnership relationship, a suitable modification to Paragraph 11.77 could be considered.
MO 72	2	SD 12 D c.	c. They are located within a Strategic Industrial Location ( <u>SIL</u> ), or involve alterations or extensions to an existing facility located outside a SIL,	Introduce acronym/ abbreviation.
MO 73	2	SD 12	Consider a modification to the new Local Plan at supporting text Paragraph 11.77 to include an appropriate factual reference to the City of Westminster and how it interacts with the wider South East London Joint Waste Planning Group. The wording in the supporting text of the new Bexley Local Plan – at Paragraph 6.83, may provide a model for the modification.	<p>The Council welcomes and notes the comments raised by the City of Westminster. This is not considered to be a matter of soundness for the new Local Plan.</p> <p>Nevertheless, in the interests of maintaining a positive partnership relationship, a suitable modification to Paragraph 11.77 could be considered.</p>
MO 74	2	SD 10  Para 11.63 and Para 11.68	<p>Para 11.63</p> <p>The council to consider introducing a minor modification to the supporting text under Paragraph 11.63 to reflect the factual position</p> <p>Paragraph 11.63 “Thames Water record <u>reported</u> sewer flooding incidents by postcode area and this information should be referred.”</p> <p>Para 11.68</p> <p>The Council to consider additional wording to the supporting text set out under Paragraph 11.68 through the modifications process</p>	<p>The Council notes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy SD 10 Water supply and wastewater.</p> <p>The Council notes and welcomes the statement that Thames Water wish to co-operate and maintain a good working relationship with local planning authorities – providing necessary support for the provision of water supply and sewerage/wastewater treatment infrastructure. The Council fully acknowledges the support provided by its infrastructure partners in delivering planned-for growth.</p>

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			Paragraph 11.68 “New residential development must meet the London Plan standard for mains water consumption, which reflects the Optional Requirement set out in Part G of the Building Regulations. <u>All new residential developments (including replacement dwellings) will meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, using the ‘Fittings Approach’ in table 2.2 as set out in Building Regulations part G2. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.</u> Major non-residential development must meet BREEAM excellent standard for the ‘Wat 01’ water category, to achieve at least a 12.5% improvement over defined baseline performance standard. In addition, major developments and high or intense water use developments (such as hotels) should include a grey water and rain water harvesting system, and applications must provide robust justification where this is not considered feasible. Planning conditions will be used to ensure water efficiency targets are met.”	<p>The Council notes the clarification that Thames Water report flood incidents and does not itself monitor flood events. In response the Council can consider introducing an amendment to the supporting text as a minor modification.</p> <p>The Council notes the comments made in relation to the possible impact of growth on water and wastewater demand across the Borough. Within this context, the comments made in relation to water efficiency are recognised. The Council can consider an amendment to the wording of the supporting text set out under Paragraph 11.68.</p>
<b>Chapter 12 – Transport and Connectivity</b>				
MO 75	2	TR 01	<b>Infrastructure Delivery Plan</b> Consider the suggested removal of references to the New Cross to Lewisham Overground extension as part of the regular review of the Infrastructure Delivery Plan.	Infrastructure Delivery Plan The Council notes the comments made in relation to the current Infrastructure Delivery Plan. This is not in itself a matter of soundness. Nevertheless, the Council will seek to amend this accordingly.
MO 76	2	TR 02 A	A The Bakerloo line extension ( <u>BLE</u> ) is fundamental to improving public transport access as well as supporting growth and regeneration in Lewisham and London. The...	Introduce acronym/ abbreviation.
MO 77	2	TR 02 Para 12.10	The Directions require the local planning authority to consult TfL on planning applications within the safeguarding zone’.	Delete superfluous inverted comma.
MO 78	2	TR 04 G	G The Council will consider the need for <del>Controlled Parking Zones</del> <u>CPZs</u> to manage additional	Introduce acronym/ abbreviation.
MO 79	2	TR 04	<p><b>Definition of Car-Lite</b> The Council will consider amending the new Local Plan Appendix 2: Glossary, to include a definition of the term car lite.</p> <p><b>Policy TR 04 B a – d</b> The Council will consider and clarify accordingly the use of the words “or” and “and”.</p> <p><b>Paragraph 12.27</b> The Council to consider the following amendment –</p> <p><u>“Measures such as the use of car clubs and electrically charged or Ultra-Low Emission vehicles can provide an alternative to car ownership and conventional gas fuelled vehicles.”</u></p> <p><b>New Paragraph 12.28</b></p> <p><u>“Car clubs can serve to support car-free development. They are best implemented in association with reductions in the overall number of parking spaces being provided in an area. Simply adding car club cars to areas with lots of parking is not an effective way to reduce car ownership or use and only serves to increase the dominance of vehicles on the streets In new developments. Consequently, car clubs should be deployed as a means to reduce the overall volume of parking, specifically in locations d where they can provide for occasional car use for households that are prevented from owning their own car, where parking levels are very low, and they should include electric vehicle charging points.”</u></p>	<p>The Council welcomes the broad level of support offered in relation to the new Local Plan Policy TR 04 Parking.</p> <p><b>Definition of Car-Lite</b> The Council considers that a more appropriate location for this definition is under the new Local Plan Appendix 2: Glossary.</p> <p><b>Policy TR 04 B</b> The Council notes the comments and considers that this is not a matter of soundness.</p> <p><b>Policy TR 04 B a – d</b> The Council acknowledges that there may be a need to clarify the use of the words “or” and “and”.</p> <p><b>Policy TR 04 C and D</b> The Council notes the detailed requirements made by the respondent in relation to the provision of new disabled persons’ parking. The suggested amendments are matters of detail that go beyond the intended scope of the policy. These are matters already addressed under London Plan Policy T6.1 Residential Parking. They do not need to be repeated in the new Local Plan to ensure that it is sound.</p>

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				<p>Policy TR 04 I – K The Council notes the detailed requirements made by the respondent in relation to the consideration and provision of electric vehicle charging within PDMPs. The suggested amendments are matters of detail that go beyond the intended scope of the policy. These are matters already addressed under London Plan Policy T6.1 Residential Parking. They do not need to be repeated in the new Local Plan to ensure that it is sound.</p> <p>The Council also notes the suggested amendment to include additional text setting out the purpose of PDMPs as part of the Policy’s supporting text. The suggested amendments are matters of detail that go beyond the intended scope of the policy. These are matters already addressed under London Plan Policy T6.1 Residential Parking Paragraph 10.6.11. They do not need to be repeated in the new Local Plan to ensure that it is sound.</p> <p>Paragraph 12.24 The Council notes the comments made in respect of this supporting text paragraph. Upon further careful consideration the Council concludes that the text is clear and unambiguous. Step-free access is the sole form of infrastructure improvement referenced within this paragraph. Consequently, the reference to the delivery of “this provision” can only refer to step-free access.</p> <p>Paragraph 12.27 The Council has considered the respondent’s comments and suggested amendments. Although the Council understands the respondent’s logic, the suggested amendments are considered unsound. As an alternative the Council could consider an alternative amendment that provides further clarity.</p>
MO 80	2	TR 06	<p>Consider amending the wording of the new Local Plan Policy TR 06 A c –</p> <p><i>“It is suitably demonstrated that there will be no adverse impact on amenity and the highway network, <del>including existing on-street parking provision;</del>”</i></p>	The Council notes the comments and suggested amendment to the new Local Plan Policy TR 06. The Council acknowledges that improved taxi or private hire provision could contribute towards the London Plan Good Growth objective of making the best use of land. The Council will consider the suggested amendment.
MO 81	2	TR 07 Para 12.42	<p>– Development located on a principal street frontage must be well designed and sensitively integrated onto or within a building,</p>	Correct typographic error – delete “;”
MO 82	2	Para 12.44	<p>Amend - <i>“In town centres and other high traffic areas, the minimum residual distance of <del>1.8</del> <u>2</u> metres may not be sufficient to enable appropriate pedestrian flow,”</i></p>	Amend factual error – the minimum residual distance specified by the Manual for Streets is 2m.

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<b>Chapter 13 – LEWISHAM’S NEIGHBOURHOODS AND PLACES</b>																																				
MO 83	3	Table 13.1	<table border="1"> <thead> <tr> <th>Character Area</th> <th>Homes (net units)</th> <th>Employment (gross floorspace m<sup>2</sup>)</th> <th>Main town centre uses (gross floorspace m<sup>2</sup>)</th> </tr> </thead> <tbody> <tr> <td>Central</td> <td>7,085</td> <td>73,714</td> <td>131,499</td> </tr> <tr> <td>North</td> <td><del>12,921</del> <u>12,948</u></td> <td>110,597</td> <td>124,866</td> </tr> <tr> <td>East</td> <td><del>1,244</del> <u>1,400</u></td> <td>5,140</td> <td>13,325</td> </tr> <tr> <td>South</td> <td><del>2,262 – 4,736</del> <u>2,594 – 5,068</u></td> <td>23,793</td> <td>38,648</td> </tr> <tr> <td>West</td> <td>901</td> <td>23,985</td> <td>10,612</td> </tr> <tr> <td>Total for 20-year Plan period</td> <td><del>24,413 – 26,887</del> <u>24,928 – 27,402</u></td> <td>237,228</td> <td>318,950</td> </tr> <tr> <td>Net additional m<sup>2</sup> excluding consented developments</td> <td></td> <td>62,634</td> <td>32,394</td> </tr> </tbody> </table>	Character Area	Homes (net units)	Employment (gross floorspace m <sup>2</sup> )	Main town centre uses (gross floorspace m <sup>2</sup> )	Central	7,085	73,714	131,499	North	<del>12,921</del> <u>12,948</u>	110,597	124,866	East	<del>1,244</del> <u>1,400</u>	5,140	13,325	South	<del>2,262 – 4,736</del> <u>2,594 – 5,068</u>	23,793	38,648	West	901	23,985	10,612	Total for 20-year Plan period	<del>24,413 – 26,887</del> <u>24,928 – 27,402</u>	237,228	318,950	Net additional m <sup>2</sup> excluding consented developments		62,634	32,394	Updated to reflect latest changes to the Housing Trajectory and Appendix 6.
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<b>Chapter 14 – LEWISHAM’S CENTRAL AREA</b>																																				
MO 84	3	Context and Character Para 14.5	14.5 Hither Green is characterised by predominantly established residential areas of a Victorian character which are serviced by local centres and parades, including near Hither Green station and along Hither Green Lane. -	Delete superfluous full stop.																																
MO 85	3	LCA 04 A21 corridor Para 14.9	To fully realise the growth potential of the Opportunity Area it is vital that the regeneration and renewal of the Major Centres is delivered and new transport infrastructure is secured, including the Bakerloo line extension and upgrade of Lewisham interchange, which is one of London’s main strategic transport interchanges. -	Delete superfluous full stop.																																
MO 86	3	LCA Key spatial objectives and Figure 14.2	<p><i>Subject to them being demonstrably necessary to ensure soundness, the Council will consider amendments to the Key Spatial Objectives (Page 443) –</i></p> <p><u>“10 Improved health across the borough through supporting the longevity of the existing University Hospital Lewisham estate through a phased masterplan approach and site wide decarbonisation strategy. Facilitate connectivity to the surrounds including the Ravensbourne River, public realm along Lewisham High Street and nearby open spaces.”</u></p> <p><i>Subject to the above addition being necessary the Council could also consider additional annotation to Figure 14.2 Central Area key diagram to identify the location of the University Hospital Lewisham</i></p>	<p>The Council notes the comments made in relation to the new Local Plan Lewisham Central Area Key Spatial Objectives.</p> <p>The Council acknowledges that the healthcare assets, facilities, and services provided University Hospital Lewisham make a significant contribution to place-making across Lewisham Central Area. Consequently, the Council could consider the suggested additional text to the Key Spatial Objectives table (Page 443) as a possible major modification to be identified through the examination process.</p>																																
MO 87	3	LCA SA 01	<u>“Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network.”</u>	The Council to consider an amended wording at Paragraph 14.24 6) –																																
MO 88	3	LCA SA 01	<p>The Council to consider an amended wording at Paragraph 14.24 6) –</p> <p><u>“Applicants should work in partnership with Thames Water and engage with them early to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable, allow access for maintenance and repair of sewers and ensure infrastructure upgrades are delivered ahead of the site being occupied through a housing phasing plan. Given the adjacent watercourse, surface water should not be discharged to the public network.”</u></p>	<p>The Council notes and welcomes the broadly supportive comments made by Thames Water in relation to the new Local Plan Policy LCA SA 01 Lewisham Gateway.</p> <p>The Council notes that the new Local Plan Policy LCA SA 01 states that “Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to</p>																																

Modification reference	Part	Section, policy, or paragraph	Proposed Modification ( <del>deleted text in strikethrough</del> , <u>new text underlines</u> )	Reason for change
				mitigate against flood risk...Applicants should work in partnership with Thames Water. Given the adjacent watercourse, surface water should not be discharged to the public network.”  The Council could consider an addition to the policy wording, through the modifications process, to further strengthen the wording if that were considered necessary for the purposes of soundness.
MO 89	3	LCA SA 04 Randlesdown Road Table 21.5	The Council will consider minor modifications to the boundary of the Bromley Road SIL and Local Centre and to Table 21.5 Table showing Town Centres and Primary Shopping Centres, to rectify the error.	The Council agrees that the SIL boundary should include no.4 Randlesdown Road whilst the row of retail units/takeaways should lie outside of the SIL boundary.
MO 90	3	LCA SA 04 Randlesdown Road Table 21.5	The Council will consider minor modifications to the boundary of the Bromley Road SIL and Local Centre and to Table 21.5 Table showing Town Centres and Primary Shopping Centres, to rectify the error.	The Council agrees that the SIL boundary should include no.4 Randlesdown Road whilst the row of retail units/takeaways should lie outside of the SIL boundary.
MO 91	3	LCA SA 08	110-114 Loampit Vale  Remove “ <del>Full application DC/17/102049 granted in February 2018</del> and replace with “ <u>None</u> ”	This planning reference incorrectly relates to Carpetright site. 110-114 Loampit Vale does not have planning consent.
MO 92	3	LCA SA 08	Seek to amend the wording of the new Local Plan Policy LCA SA 08 to reflect the factual planning history of the site allocation. Suggest that this amendment be introduced as a minor modification.	The Council notes the comments made in relation to the new Local Plan Policy LCA SA 08.  The reference in the new Local Plan to planning consent being granted in 2018 is incorrect and has been mistakenly included in this site allocation. The planning application referenced relates to a nearby site and there is no extant planning permission available to lapse. The Borough Council will seek to rectify this through a minor modification.  Site allocation LCA SA 08 100-114 Loampit Vale seeks to incorporate main town centre, commercial and residential uses as this will provide for a more optimal use of land that supports the town centre’s vitality and viability at this important transitional site at the edge of the town centre. The site allocation does specify that the maximum viable amount of employment floorspace must be provided, in line with Policy EC8 (non-designated employment sites).
MO 93	3	LCA SA 09	“Applicants <del>should</del> <u>must</u> work in partnership with Thames Water to minimise impacts on groundwater, manage surface water, divert existing sewers where applicable and ensure infrastructure upgrades are delivered ahead of the site being occupied. <u>This will include the preparation and agreement of housing phasing plan.</u> Given the adjacent watercourse, surface water should not be discharged to the public network. New connections into the Ravensbourne trunk sewer will not be allowed.”	The Council to consider an amended wording at Paragraph 14.63 3) –
MO 94	3	LCA SA 12 Para 14.76 3	Development must provide for the full restoration of the Ladywell <del>baths</del> <u>Baths.</u>	Capitalise proper noun.

Modification reference	Part	Section, policy, or paragraph	Proposed Modification ( <del>deleted text in strikethrough</del> , <u>new text underlines</u> )	Reason for change
MO 95	3	LCA SA 18	<p>Subject to it being demonstrably necessary it is suggested that the Council consider a modification to the new Local Plan Policy LCA SA 18 Paragraph 14.107 2 as follows –</p> <p><i>“2. Development must not prejudice the delivery of transport infrastructure, including public realm enhancements associated with the re-alignment of the A205. <u>Developers should work in partnership with TfL to deliver improvements along the sites’ frontages.</u> The siting of buildings must ensure the traffic and transport improvements along the South Circular at Sangley Road, Plassy Road and Brownhill Roads can be implemented in full.”</i></p> <p>The Council will further explore the necessity of including 12 Brownhill Road with the site allocation boundary. Subject to it being demonstrably necessary the site boundary will be amended through the modifications process.</p>	<p>The Council notes and welcomes the support offered by TfL in relation to the new Local Plan Policy LCA SA 18 Catford Island – specifically in respect of securing the delivery of highway infrastructure improvements to the A205 South Circular Road.</p> <p>The detailed comments made in relation to the wording of the Development Requirements set out under Paragraph 14.107 2 are noted. The Council could consider the suggested amendment as a modification as part of the examination process.</p> <p>The detailed comments made in relation to the wording of the Development Requirements set out under Paragraph 14.107 3 are noted. The Council considers that the current text is already sound and that the suggested addition is unnecessary.</p> <p>The comment made in relation to the site boundary and the inclusion of 12 Brownhill Road is noted. The Council will explore this matter and amend the boundary should this be necessary. This can be progressed as a modification as part of the examination process.</p>
MO 96	3	LCA SA 20	<p>South Circular</p> <p>Refine the extent of the MOL to reflect TFL’s most current proposals.</p>	The boundary of the site allocation needs amending to reflect the current route of the proposed South Circular
MO 97	3	LCA SA 21	<p><i>Consider the necessity of the proposed addition to supporting text Paragraph 14.120 8 –</i></p> <p><u>“Proposals should investigate and maximise opportunities to facilitate links through the railway arches and across the A212 as well as links across the A205.”</u></p>	<p>The Council notes and welcomes the broadly supportive comments made in relation to the new Local Plan Policy LCA LA 21 Wickes and Halfords, Catford Road.</p> <p>For clarity, the new Local Plan Policy LCA SA 21 already states that the site is allocated for “Comprehensive residential led mixed-use redevelopment with compatible main town centre and commercial uses.”</p> <p>The Council notes the suggested amendment to supporting text Paragraph 14.120 and acknowledges that the additions could provide useful additional information. However, the Council also notes that matters of connectivity are already addressed under supporting text Paragraph 14.119.</p>
<b>Chapter 15 – LEWISHAM’S NORTH AREA</b>				
MO 98	3	Context Para 15.4	<p>However these roads are dominated by <del>vehicules</del> <u>vehicles</u>, prone to traffic and congestion, and typically suffer from poorer quality public realm, which limits their suitability for movement by walking and cycling.</p>	Correct spelling mistake – delete “vehicules” and replace with “vehicles”.
MO 99	3	LNA Para 15.12	<p>The Local Plan designates a new Creative Enterprise Zone (<u>CEZ</u>) in North Lewisham. This is one of the first CEZs in the Capital and is backed by the Mayor of London.</p>	Introduce acronym/ abbreviation.

Modification reference	Part	Section, policy, or paragraph	Proposed Modification ( <del>deleted text in strikethrough</del> , <u>new text underlines</u> )	Reason for change
MO 100	3	LNA SA 15	<b><u>“Paragraph 15.91 2. Development should be designed to protect the amenity of residential properties, taking into account the theatre’s out of hours’ access and servicing needs, in line with the Agent of Change principle.”</u></b>	Amend new Local Plan Policy LNA SA15 Paragraph 15.91 to include new text under new Point 2 –
MO 101	3	LNA SA 01 Para 15.26 5.	5. Development should make provision of open space to enlarge Sayes Court Park and celebrate the sites historic connection with John Evelyn. New gardens, landscaping and treatment of the public realm should connect with the memory of John Evelyn’s <del>fa-mous</del> <u>famous</u> 17th century garden that once flourished on the site.	Delete superfluous hyphenated word “fa-mous” and replace with “famous”.
MO 102	3	LNA SA 01	Amend new Local Plan Policy LNA SA 01 Paragraph 15.26 Development Guidelines to include a new sub-paragraph –  New text –  <b><u>“Development proposals in proximity to the safeguarded Convoys Wharf must take into account potential future wharf operations in accordance with the Agent of Change Principle and London Plan policy SI15”</u></b>	The Council notes and acknowledges the comments made in relation to the new Local Plan Policies LNA SA 01 and SA 02.  The Council notes and agrees that the suggested additions would provide further clarity to those reading the new Local Plan. The Council concludes that additions could be considered as part of the modification process.
MO 103	3	LNA SA 02	The Council could consider a minor addition to the text of the new Local Plan Policy LNA 02 Part C, as an alternative to the suggested wording.  <i>This principal east-west route should be supported by a complementary network of legible, safe and accessible walking routes and cycleways, <b><u>and their supporting infrastructure</u></b>, that link with it to enhance connections between neighbourhoods and places. This includes connections to Deptford and New Cross District Centres, New Cross and New Gate stations, Goldsmith’s College and open spaces in the surrounding area, such as Bridgehouse Meadows, Fordham Park and Folkestone Gardens.</i>	The Council notes the comments made in relation to the new Local Plan Policy LNA 02 New Cross Road / A2 corridor.  The Council considers the new Local Plan Policy LNA 02 to be sound. The suggested additional text is not justified and is overly prescriptive. However, the Council could consider an alternative amendment that captures the intent of the comment without being overly prescriptive.
MO 104	3	LNA SA 02	Amend new Local Plan Policy LNA SA 02 Paragraph 15.34 Development Guidelines to include a new sub-paragraph –  New text –  <b><u>“Development proposals in proximity to the safeguarded Convoys Wharf must take into account potential future wharf operations in accordance with the Agent of Change Principle and London Plan policy SI15”</u></b>	The Council notes and acknowledges the comments made in relation to the new Local Plan Policies LNA SA 01 and SA 02.  The Council notes and agrees that the suggested additions would provide further clarity to those reading the new Local Plan. The Council concludes that additions could be considered as part of the modification process.
MO 105	3	LNA SA 03	Evelyn Court at Surrey Canal Road Strategic Industrial Location  Rename site allocation, remove <del>“Evelyn Court at Surrey Canal Road Strategic Industrial Location”</del> and replace with <b><u>“Evelyn Court Locally Significant Industrial Site”</u></b>	The site allocation title incorrectly relates to the existing site designation and should be replaced by a title that reflects the proposed site allocation designation as an LSIS.
MO 106	3	LNA SA 03  Deptford Trading Estate	<b><i>Text to be prepared re: possible minor modification</i></b>	The Council will consider minor modifications to ensure that creative and cultural industries within the CEZ should complement / not adversely impact on the continued operation and effectiveness of the Surrey Canal SIL for industrial and logistical use.
MO 107	3	LNA SA 03  Deptford Trading Estate	The Council will consider minor modifications to ensure that creative and cultural industries within the CEZ should complement / not adversely impact on the continued operation and effectiveness of the Surrey Canal SIL for industrial and logistical use	The Council agrees that the prime function of the Surrey Canal SIL should be to accommodate industrial and logistic uses, regardless that it is located within the CEZ, as it serves an important function not just within the local economy but across London too.  Creative and cultural industries should not be prioritised over industrial and logistic uses, to ensure there is no detrimental impact to the functioning and continued operation of the Surrey Canal SIL.
MO 108	3	LNA SA 04	Neptune Wharf MEL	To rectify typing error



Modification reference	Part	Section, policy, or paragraph	Proposed Modification ( <del>deleted text in strikethrough</del> , <u>new text underlines</u> )	Reason for change
			Within timeframe for delivery remove “ <del>Yes</del> ” from Years 11-15.	
MO 109	3	LNA SA 06	Apollo Business Centre LSIS  Include railway arches	?
MO 110	3	LNA SA 08	<p><i>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 08.</i></p> <p><i>The Council notes that the respondent referred to this proposed site allocation as part of their Reg 18 representation. Within that representation they stated their belief that the site has a variety of development constraints that could not be overcome without the site actively promoting what could be delivered in terms of high-quality industrial land. Nevertheless, the proposal to allocate the site was positively received by the respondent at that stage. The consequential action for the Council, from the Reg 18 consultation, was to allocate the site.</i></p> <p><i>The Council highlights that the new Local Plan is not seeking to downgrade any employment land. It is instead seeking a re-allocation of the designated employment land from SIL to LSIS, so that a different and more suitable range of employment uses can take place on these sites whilst allowing the sites to be intensified through co-location with residential uses.</i></p> <p><i>The proposed site allocation seeks to extend the land designated as SIL under London Plan Policy E5. The proposed allocation seeks to make-good losses in SIL (as identified above).</i></p> <p><i>The site is bounded by north-south rail lines. It is accessible from Senegal Road to the south (by foot) and Silwood Road to north, in terms of vehicular road access. The respondent has suggested that the site is unsuitable for all possible forms of SIL-employment use; specifically strategic B8 warehousing/ distribution. The respondent has cited accessibility as being the primary constraint. This appears to be an opinion derived from desk-top work. The respondent has not supplied any factual evidence to support their position.</i></p> <p><i>It is noted that the proposed site allocation is of a similar typology to other SIL-sites located to its immediate southeast. Whilst some of these similar sites benefit from better road access, the proposed BDU site allocation is typical in size, format and access arrangement to most manufacturing and industrial sites located within the capital. Indeed, it can most reasonably be described as a typical rail arches employment site. As such its proximity to existing (and proposed) residential uses is not unusual, or necessarily a constraint to its use as SIL. Indeed, this type of colocation is encouraged by the London Plan.</i></p> <p><i>The Council notes the comments made in relation to the new Local Plan Policy LNA SA 08.</i></p> <p><i>The respondent’s comments on the apparent complexity of the site allocation are noted. In response the Council notes that these comments are based on desk-top observations rather than being informed by either market signals or any form of technical assessment. It is also assumed that the respondent’s initial comments are based on the unreasonable and unrealistic assumption that this individual site should have the capacity to meet all the operational requirements identified under London Plan Policy E4. The Council challenges this interpretation.</i></p>	<p>To demonstrate that the proposed site allocation is justified it is suggested that the Council commission further evidence that demonstrates how this site (and similar sites such as this) will come forward to deliver SIL uses.</p> <p>It is suggested that this additional evidence could explore possible trajectories for the site coming forward as SIL. This could provide support to a trigger policy approach, or alternatively support the use of NPPF Para 33 to review this policy area should it be necessary.</p>
MO 111	3	LNA SA 09  Para 15.64	<p><i>“Paragraph 15.64</i></p> <p><i>6. The site must be fully re-integrated with the surrounding street network to improve access and permeability in the local area, with enhanced walking and cycle connections between public spaces and the site’s surrounding neighbourhoods. This will require a hierarchy of routes with clearly articulated east-west and north-south corridors. The site must also <u>contribute towards facilitate</u> the delivery of Cycleway 10.”</i></p>	It is suggested that the Council consider amendments to Paragraph 15.64, which can be brought forward through the modifications process –
MO 112	3	LNA SA 10 Para 15.69	Redevelopment will also enable townscape improvements and public realm <del>enhance-ments</del> <u>enhancements</u> , including new public amenity space to act as a focal point for the neighbourhood.	Correct punctuation – introduce full stop at end of the sentence.

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MO 113		Figure 15.2	The Council to consider the benefits and mapping practicalities of identifying the Confirmed Safeguarded Wharf Boundary again under Figure 15.2.	The Council will consider the suggestion to amend Figure 15.2 to identify the Confirmed Safeguarded Wharf Boundary – albeit that this may not be necessary for purposes of soundness as the Boundary is clearly defined elsewhere within the new Local Plan (figure 11.4).
MO 114	3	New numbered Paragraph 15.72	New and improved transport infrastructure, including land and facilities required to accommodate the Bakerloo line extension <u>(BLE)</u> . Comprehensive mixed-use redevelopment with compatible main town centre and residential uses.	Insert/ introduce new acronym/ abbreviation “BLE”.
MO 115	3	LNA SA 18	Sun Wharf  In planning status remove “... <del>was considered at Strategic Planning Committee on 1<sup>st</sup> September 2022</del> ” and replace with “... <u>has a resolution to approve</u> ”.	To reflect that the site has progressed towards planning consent.
MO 116	3	LNA SA 18 Paragraph 15.105	5. The site must be fully re-integrated with the surrounding street network to improve <del>ac-cess</del> <u>access</u> and permeability. The site must also facilitate the delivery of Cycleway 10 which runs over Ha’penny Bridge and Cycleway 35 running along Creeside.	Delete unnecessary hyphenated word “ac-cess”.  Note that the supporting text paragraph needs to be renumbered.
MO 117	3	LNA SA 18 Paragraph 15.105	6. <del>6</del> Delivery of new and improved public realm and open space in accordance with a site-wide public realm strategy, including:	Delete duplicate number 6.  Note that the supporting text paragraph needs to be renumbered.
MO 118	3	LNA SA 18 Paragraph 15.105	8. <del>8</del> . Development proposals must protect and seek to enhance green infrastructure, the intertidal terrace, the sand martin bank at Deptford Creek and the SINC at Creekside Discovery Centre, The Creek and at Sue Godfrey Park.	Delete duplicate number 8.  Note that the supporting text paragraph needs to be renumbered.
MO 119	3	LNA SA 18	<i>Site Address - “Cockpit Arts Centre <u>and Sun Wharf ...</u>”</i>  <i>PTAL Accessibility rating</i> <u>3 - 4</u>  <i>Delivery of Cycleways - “5. The site must be fully re-integrated with the surrounding street network to improve <del>ac-cess</del> and permeability. The site must also <u>facilitate make a proportionate contribution towards</u> the delivery of Cycleway 10 which runs over Ha’penny Bridge and Cycleway 35 running along Creeside.”</i>  <i>Safeguarding of Brewery Wharf - “The proposed residential development located <del>in close proximity adjacent</del> to the safeguarded Brewery Wharf (<u>located to the north east</u>) should be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, in line with the Agent of Change principle.”</i>	<b>Site Address</b> Suggest that the Council consider identifying a minor modification to the site address as part of the Submission process –  <b>PTAL Accessibility Rating</b> Subject to the confirmation of fact, consider amendment to Policy LNA SA 18 Site Details PTAL Ratings –  <b>Delivery of Cycleways</b> Suggest that the Council consider an amendment to the text at Paragraph 15.105 5 to ensure that the development requirements are reasonable and proportionate. The suggested amendment at Paragraph 15.105 –  <b>Safeguarding of Brewery Wharf</b> Suggest that the Council consider a minor modification to the wording at Paragraph 15.106 6 –
MO 120		LNA SA 18	<b>Indicative Development Capacity</b>  <i>Table 13.1 summarises the <del>overall</del> <u>minimum scale of</u> delivery outcomes expected by the site allocations, both borough-wide and by character area.”</i>	<b>Indicative Development Capacity</b>  Suggest that the Council consider an amended wording to Paragraph 13.8 –

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			<p><b>Cycleway Improvements</b></p> <p><i>“5. The site must be fully re-integrated with the surrounding street network to improve <u>access</u> and permeability. The site must also <u>contribute towards</u> <del>facilitate</del> the delivery of Cycleway 10 which runs over Ha’penny Bridge and Cycleway 35 running along Creekside.”</i></p> <p><b>Green Infrastructure and Flooding</b></p> <p><i>“8. Development proposals must protect and seek to enhance green infrastructure, the intertidal terrace, the sand martin bank at Deptford Creek and the SINc at Creekside Discovery Centre, The Creek and at Sue Godfrey Park. <u>Developers must work with the Environment Agency to ensure that green infrastructure improvements complement and enable necessary investment in flood risk management.</u>”</i></p> <p><b>Brewery Wharf</b></p> <p><i>“<del>The proposed</del> <u>Proposals for new</u> residential development located in <del>close</del> proximity to the <u>neighbouring</u> safeguarded Brewery Wharf should be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, in line with the Agent of Change principle.”</i></p>	<p><b>Accessibility (PTAL rating)</b></p> <p>Subject to the claimed PTAL rating being proven, the Council can consider identifying this as a factual correction through the minor modifications process – correcting errors as part of the submission process.</p> <p><b>Cycleway Improvements</b></p> <p>Suggest that the Council consider an amended wording to Paragraph 15.105 –</p> <p><b>Green Infrastructure and Flooding</b></p> <p>Subject to it being shown as necessary to ensure soundness, the Council could consider an amended wording to Paragraph 15.105</p>
MO 121	3	Page 570 and onwards for the remainder of Chapter 15	Two supporting text paragraphs (at the top of Page 570) are not numbered – these need to be numbered with a consequential impact on subsequent paragraph throughout the remainder of Chapter 15.	Add paragraph numbers and consequentially re-number remaining paragraphs across the remainder of Chapter 15.
<b>Chapter 16 – Lewisham’s East Area</b>				
MO 122	3	LEA SA 03 Planning Context	Full application DC/14/090032 received resolution to grant permission in May 2016. Full application DC/18/107468 submitted in June 2018 was not determined. Pre-application. New application to be submitted in 2022.-	Delete superfluous full stop.
MO 123	3	LEA SA 03	Consider introducing a modification during the examination process that updates the new Local Plan Policy SEA SA 03 to include a reference to planning application DC/22/126997.	<p>The Council notes the comments made in relation to the new Local Plan Policy LEA SA 03 Leegate Shopping Centre.</p> <p>The Council notes the suggestion that the new Local Plan be amended to refer to the most recent planning history. This could be considered through the examination modifications process.</p> <p>The Council also notes the suggestion that an additional requirement be introduced, which seeks the retention of the mature trees that front onto the Eltham Road. Whilst this may provide additional information, it is not necessary to ensure the soundness of the new Local Plan. The new Local Plan Policy GR 5 Urban Greening and Trees already places a requirement to retain existing trees on site.</p>
MO 124	3	LEA SA 03	Subject to it being demonstrably necessary for soundness, or desirable for decision-taking consider the introduction of the following addition to Paragraph 16.28 as part of the main modifications process –	<p>The Council notes and welcomes the comments made in relation to the new Local Plan Policy LEA SA 03 Leegate Shopping Centre.</p> <p>The Council notes the further input from the respondent suggesting further policy detail setting out the nature of future</p>

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			“Provision of community infrastructure to meet demand arising from the development, including a new health facility in partnership with the CCG, NHS and other health bodies. <u>New provision should include ground floor accommodation with access for emergency vehicles, blue badge and other parking for frail patients.</u> ”	potential on-site health provision. The Council considers that the additional text is not necessary to ensure soundness. However, the Council could consider introduce some additional text to meet this request through the main modifications process.
<b>Chapter 17 – Lewisham’s South Area</b>				
MO 125		LSA SA 08	<b>“Paragraph 17.23 2. Development proposals must protect and seek to enhance green infrastructure and biodiversity, including the SINC <u>and any ancient or veteran trees.</u>”</b>	Amend new Local Plan Policy LSA SA 08 Paragraph 17.23 to read –
MO 126		LSA SA 01	<i>“The site is constrained by existing utilities restrictions, easements; a Hazardous Substances Consent; a former gas holder and significant service infrastructure that supported its former use, including a gas mains and gas ‘governor’ and a bentonite wall. Ground surveys will need to identify the nature and extent of ground contamination and environmental pollution, with remedial works and/or mitigation measures implemented, where necessary, in partnership with utility providers. The Council recognises the challenges associated with significant decontamination and remediation of the site, <u>and when necessary, will play a proactive role in the revoking of the Hazardous Substances Consent (HSC).</u>”</i>	The Council will contact the site allocation promoter with the objective of securing a signed SoCG that identifies matters of agreement between the parties and a delivery trajectory.  The Council will consider a modification to Policy LSA SA 01 Paragraph 17.18 6 – subject to it being demonstrated as necessary to ensure soundness
MO 127	3	LSA SA 3  Paragraph 17.18.6	<i>“The site is constrained by existing utilities restrictions, easements; a Hazardous Substances Consent; a former gas holder and significant service infrastructure that supported its former use, including a gas mains and gas ‘governor’ and a bentonite wall. Ground surveys will need to identify the nature and extent of ground contamination and environmental pollution, with remedial works and/or mitigation measures implemented, where necessary, in partnership with utility providers. The Council recognises the challenges associated with significant decontamination and remediation of the site, <u>and when necessary, will play a proactive role in the revoking of the Hazardous Substances Consent (HSC).</u>”</i>	The Council will contact the site allocation promoter with the objective of securing a signed SoCG that identifies matters of agreement between the parties and a delivery trajectory.  The Council will consider a modification to Policy LSA SA 01 Paragraph 17.18 6 – subject to it being demonstrated as necessary to ensure soundness
MO 128	3	LSA SA 03	Consider an alternative amended wording to supporting text Paragraph 17.11 –  <u>“The Bell Green and Lower Sydenham area is being actively promoted by the Council to become one of London’s next Opportunity Areas. The Council will support the designation of the Bell Green and Lower Sydenham Area and make robust representations to achieve this as part of the next review of the London Plan.”</u>	The Council notes and welcomes the comments made by the respondent in relation to a future iteration of the London Plan potentially identifying Bell Green and Lower Sydenham as an Opportunity Area. The Council also welcomes the broadly supportive comments made in respect of how the new Local Plan Policy LSA 03 addresses the proposed Bakerloo Line Extension.  The Council notes the respondent’s comments on the plan-making process associated with the designation of future Opportunity Areas – such as the one anticipated for Bell Green. Whilst the Council understands the technical processes for designation, it is nevertheless disappointed by these negative comments. The residents and communities of Bell Green and Lower Sydenham are eagerly expecting positive change through the new Local Plan. The suggested amendment is potentially incendiary and could have negative impact for the respondent and the Greater London Authority. Nevertheless, the Council will consider a more positively worded but factually accurate alternative.  The Council notes the comments raised in relation to the different definitions of the terms “safeguarding” and how these may apply in respect of the proposed Bakerloo Line Extension. The Council acknowledges that such technical differences may exist but concludes that this is not a fundamental matter of soundness for the new Local Plan. The respondent, Transport for London, is and

Modification reference	Part	Section, policy, or paragraph	Proposed Modification ( <del>deleted text in strikethrough</del> , <u>new text underlines</u> )	Reason for change
				<p>will continue to be involved in the decision-taking process and has frequent opportunities to define the technical distinctions when it is necessary.</p> <p>The Council note that Transport for London's position is that they are considering extending the Bakerloo line to improve transport connections in southeast London. The detail of the proposed scheme remains in preparation – the Council note that the extent of scheme south of Lewisham Town Centre is particularly vague. Consequently, in the absence of that necessary detail the suggested additions to the new Local Plan Policy LSA 03 are unjustified.</p>
MO 129	3	LSA SA 06	<p>Consider modifications to supporting text Paragraph 17.38 to include references to the need for partnership working with the London Borough of Bromley in relation to possible impacts upon the neighbouring Lower Sydenham LSIS, and the Metropolitan Open Land located along Worsley Bridge Road.</p> <p>Where appropriate make minor modifications to other relevant Lewisham South Area site allocations supporting text to include reference to partnership working with the London Borough of Bromley.</p>	<p>The Council notes the comments in relation to new Local Plan Policy LSA SA 06 and the broad support expressed by the London Borough of Bromley for the site allocation.</p> <p>The Council notes the specific comments made in relation to the Lower Sydenham LSIS located across the Borough boundary in Bromley.</p> <p>The Council also notes the specific comments made in relation to the Metropolitan Open Land located along Worsley Bridge Road.</p>
MO 130	3	LSA SA 10	<p>Suggest that the Council establish the factual position relating to the retail operators on-site, specifically in relation to Argos. Subject to the factual position, the Council could consider modifying the policy title accordingly. It is recommended that any new policy title/ name clearly reflect the local established name for the site – in order to ensure that readers are clear as to its location.</p>	<p>The Council notes the comments made in relation to the new Local Plan Policy LSA SA 10 Homebase/Argos, Bromley Road.</p> <p>It is noted that the respondent is currently a business that occupies and operates from within the site allocation. The request the policy and its supporting text be amended to reflect their position within the local economy and secure their on-site presence across the plan period is noted. Although the Council is genuinely supportive of businesses operating across the Borough and will seek to secure their retention and continued trading, there are recognised limits to what actions it can take through the plan-making process. For example, it would be unsound for the new Local Plan to commit to a specific commercial operator to a specific site – as changing economic conditions could witness the disappearance of that operator. This has happened in recent times – notably in respect of retailers such as Woolworths, House of Fraser, and Debenhams. For that reason, the Council maintains that the policy is sound. The respondent is asked to note that the policy wording does allow for the reprovision of their offer.</p> <p>The comment made in relation to the other retail operator on the site allocation; Argos; is noted. The Council will determine the factual position on this matter and consider the need to amend the policy accordingly through the modifications process.</p>

Modification reference	Part	Section, policy, or paragraph	Proposed Modification ( <del>deleted text in strikethrough</del> , <u>new text underlines</u> )	Reason for change
MO 131	3	LSA SA 13  Paragraph 17.65 (actual Paragraph number 17.67)	<del>17.65</del> <u>17.67</u> The site is a housing estate is located in Bellingham within a predominantly residential area. Estate regeneration will replace 178 existing residential units with 362 new units to provide net 184 high quality affordable housing units, alongside public realm enhancements. 57 of the residential units in phases 1a and 1b have already been completed. Construction, with an additional three residential units, for phase 1c has started. Phase 2 (previously named Phases 4 and 5) has not yet started construction and is seeking to accommodate approximately <del>addi-tional</del> <u>additional</u> 100 residential units above the initial consent.	Renumber paragraph number as specified above.  Address superfluous hyphenation of the word “addi-tional” – replace with “additional”.
MO 132	3	LSA SA 13	<b>Indicative Capacities</b> The Council will verify the correct number of units and correct Paragraph 17.65 accordingly as a minor modification.  <b>Listed Buildings</b> The Council will verify the correct description for the on-site listed buildings and correct Paragraph 17.66 3 accordingly as a minor modification.	The Council will contact the site allocation promoter with the objective of securing a signed SoCG that identifies matters of agreement between the parties and a delivery trajectory.
MO 133	3	LSA SA 13	The Council will contact the site allocation promoter with the objective of securing a signed SoCG that identifies matters of agreement between the parties and a delivery trajectory.  Indicative Capacities  The Council will verify the correct number of units and correct Paragraph 17.65 accordingly as a minor modification.  Listed Buildings  The Council will verify the correct description for the on-site listed buildings and correct Paragraph 17.66 3 accordingly as a minor modification.	The Council notes and welcomes the comments made in relation to the new Local Plan Policy LSA SA 13 Excalibur Estate. The Council remains committed to working with its development industry partners to secure growth and good quality place-making in accordance with the new Local Plan.  Indicative Capacities The comment relating to indicative capacity and the proposal currently awaiting S106 agreement is noted. Subject to the statement being verified the Council could consider amending Paragraph 17.65 to reflect the factually correct number of units. This can be identified as a minor modification through submission.  Listed Buildings The comment relating to the on-site designated heritage assets (listed buildings) is noted. Subject to the statement being verified the Council could consider amending Paragraph 17.66 3 to provide a factually correct description. This can be progressed as a minor modification through submission.  Opportunities The Council notes the comments made in relation Paragraph 17.65, specifically in relation the factual position of current on-site delivery. It is unclear to the Council why the respondent considers this a matter of soundness as it merely sets out the factual position.  Development Guidelines The suggested additions to Paragraph 17.67 4 are noted. Whilst the Council understands why the respondent has suggested the specific amendment, the proposal itself is unsound, being unreasonable and unenforceable. The Council, as local planning authority, cannot force its infrastructure partners to engage in the decision-taking process. Nevertheless, the Council is

Modification reference	Part	Section, policy, or paragraph	Proposed Modification ( <del>deleted text in strikethrough</del> , <u>new text underlines</u> )	Reason for change
				committed to working positively with all partners involved in delivering growth and supporting infrastructure networks.
MO 134	3	LSA SA 14	Bestway Cash and Carry  Remove the whole of the South Area site allocation 14 from part 3 of the Local Plan.  Remove site allocation from the housing trajectory in Appendix 6	Landowner has no interest in re-developing the site. This site was initially assessed as a potential development site within the London wide SHLAA. Currently shown as being delivered in years 14 and 15. Could come forward by then given changing nature of employment markets. Karol thinks leave site in for debate at Examination
MO 135	3	LSA SA 18  Paragraph 13.8	<i>"Table 13.1 summarises the <del>overall</del> <u>minimum scale of</u> delivery outcomes expected by the site allocations, both borough-wide and by character area."</i>	
MO 136	3	LSA SA 18  Paragraph 15.105	<i>"5. The site must be fully re-integrated with the surrounding street network to improve <u>access</u> and permeability. The site must also <u>contribute towards facilitate</u> the delivery of Cycleway 10 which runs over Ha'penny Bridge and Cycleway 35 running along Creeside."</i>  <i>"8. Development proposals must protect and seek to enhance green infrastructure, the intertidal terrace, the sand martin bank at Deptford Creek and the SINC at Creekside Discovery Centre, The Creek and at Sue Godfrey Park. <u>Developers must work with the Environment Agency to ensure that green infrastructure improvements complement and enable necessary investment in flood risk management.</u>"</i>	<b>Cycleway Improvements</b> Suggest that the Council consider an amended wording to Paragraph 15.105 –  <b>Green Infrastructure and Flooding</b> Subject to it being shown as necessary to ensure soundness, the Council could consider an amended wording to Paragraph 15.105
MO 137	3	LSA 18  Paragraph 15.106	<i>"<del>The proposed</del> <u>Proposals for new</u> residential development located in <del>close</del> proximity to the <u>neighbouring</u> safeguarded Brewery Wharf should be designed to minimise the potential for conflicts of use and disturbance, including utilising the site layout, building orientation, uses and appropriate materials to design out potential conflicts, in line with the Agent of Change principle."</i>	<b>Brewery Wharf</b> Subject to it being shown as necessary to ensure soundness, the Council could consider an amended wording to Paragraph 15.106 –
MO 138	3	Page 675 and onwards for the remainder of Chapter 17	Two supporting text paragraphs (at the top of Page 675) are not numbered – these need to be numbered with a consequential impact on subsequent paragraph throughout the remainder of Chapter 17.  Renumber from Paragraph 17.43 onwards.	Add paragraph numbers and consequentially re-number remaining paragraphs across the remainder of Chapter 17.
<b>Chapter 18 – Lewisham's West Area</b>				
MO 139	3	LWA SA 2	D Development proposals should support the growth and evolution of Forest Hill district centre and its surrounds as a key hub of creative, cultural and community activity, in line with Policy <del>LWA2</del> <u>LWA 3</u> (Forest <del>hill</del> <u>Hill</u> district centre and surrounds).	Correct cross referencing error – delete LWA2 and replace with LWA3.  Correct proper noun error – Forest Hill not Forest hill.
MO 140	3	Para 18.34 5 and 6	5. Development should improve opportunities for walking, cycling and other active travel modes, creating a sense of arrival into the District Centre. Development should not result in a reduction in existing footway or carriageway space and where possible the width of the pavements should be increased. Development should also enhance the pedestrian crossings across the South Circular.  6. Applicants should work in partnership with Thames Water and engage with them early to manage surface water and divert existing sewers where applicable. There are no anticipated capacity concerns for the sewer on Devonshire Road.	Separate sub sections.  The current text has subsections 5 and 6 run-together – amend to separate.
MO 141	3	LWA SA 12  Para 16.63	<b>Site Area</b>	The Council will contact the site allocation promoter with the objective of securing a signed SoCG that identifies matters of agreement between the parties and a delivery trajectory.

Modification reference	Part	Section, policy, or paragraph	Proposed Modification ( <del>deleted text in strikethrough</del> , <u>new text underlines</u> )	Reason for change
			<p>The Council will reassess the site boundary and determine whether the building identified by the respondent should be included within the extent of the site allocation. Subject to an amendment being necessary to ensure soundness, the Council can seek to introduce changes to the boundary through the modifications process.</p> <p><b>Land Ownership / Delivery</b></p> <p><u>“6. Landowners must work in partnership and in accordance with a masterplan, to ensure the appropriate co-location, phasing and balance of employment and other uses across the site, in line with Policy DM3 (Masterplans and comprehensive development)”.</u></p>	<p><b>Land Ownership/ Delivery</b></p> <p>The Council to consider additions to the policy supporting text to highlight the need to apply a masterplanning approach towards the delivery of the site allocation at Paragraph 16.63 as follows:</p>
<b>General Site Allocations Modifications</b>				
MO 142	3	Site Allocations	<p>Amend site allocations, as necessary to reflect current position, including but not restricted to:</p> <p>Timeframe for Delivery – for example updates are needed for LCA SA 05, LCA SA 22, LNA SA 14, LNA SA 15, PSA SA 09, LWA SA 09.</p> <p>Indicative Development Capacity – for example updates are needed for LNA SA 05, LNA SA 06, LNA SA 17, LEA SA 03, LEA SA 07, LSA SA 01, LSA SA 13.</p> <p>Existing Planning Consent – for example by referencing planning applications that have recently been consented.</p>	To update with latest information to provide an up to date position on the delivery of housing sites and to be consistent with the latest version of the Housing Trajectory.
MO 143	3	Numerus SAs	<p>Consider the following modification (omission) text “Appropriate Location for Tall Buildings” within the Planning Designations and Site Considerations box of these site allocations:</p> <p>LCA SA 07 Lewisham Retail Park LCA SA 21 Wickes and Halfords LNA SA 02 Deptford Landings MEL LNA SA 09 Surrey Canal Triangle MEL</p> <p>Consider modification (omission) text in Schedule 12: Tall Building Suitability Zones, to align with Figures 5.3-5.10 of the new Local</p>	Complete later
<b>Chapter 19 – Delivery and Monitoring</b>				
MO 144	4	DM 02	<p>A The Council will set a Lewisham Community Infrastructure Levy (<u>CIL</u>) which is payable on all qualifying development. CIL funding will be used to secure the delivery of inclusive, healthy and liveable neighbourhoods across the Borough that are well supported by infrastructure. A CIL Charging Schedule will be published and this will be subject to periodic review over the plan period.</p>	Introduce acronym/ abbreviation for CIL.
MO 145	4	DM 02	<p>Subject to it being considered necessary to ensure soundness, the Council will consider a modification to the new Local Plan Policy DM2 Infrastructure Funding and Planning Obligations –</p> <p>“E. The following is a list of areas where planning obligations may be sought, recognising that other types of obligations may be necessary depending on the nature of a proposal and individual site circumstances: ...</p> <p>f. Community and social infrastructure (<u>including health infrastructure</u>)”</p>	<p>The Council notes the comments and welcomes the broad support offered in relation to the new Local Plan Policy DM2 Infrastructure funding and planning obligations. The Council notes the suggested addition and could consider a modification to refer to health infrastructure through the main modification process.</p> <p>The Council also notes the comments made in relation to the Infrastructure Delivery Plan. Whilst this is important, it is not matter of soundness for the new Local Plan. Nevertheless, the Council is in the process of formalising arrangements with its internal and external partners to ensure that there is a formalised mechanism for annually review the Infrastructure Delivery Plan. This will provide a regularised process for partners to update the Infrastructure Delivery Plan.</p>



Modification reference	Part	Section, policy, or paragraph	Proposed Modification ( <del>deleted text in strikethrough</del> , <u>new text underlines</u> )	Reason for change
MO 146	4	DM 07	Amend the new Local Plan Policy DM 07 Table 19.1 LPI 14 Small Housing Sites to reflect the factual position through a minor modification.	The Council welcomes the identification of this error. The text will be amended as a minor modification.
MO 147	4	DM 07 Table 19.1 LPI 14 Small Housing Sites	Small Housing Site  Delete – “Housing completions on small sites, measured against <del>draft</del> London Plan small sites target of 379 units annually,”	To reflect the factual position – namely, that the London Plan is now adopted.
<b>Chapter 20 – Appendices</b>				
MO 148	5	Appendix 1  Table 20.1	Add SELJWPG acronym to table 20.1	It is suggested that the Council consider the addition of the acronym “SELJWPG” – South East London Joint Waste Planning Group to Table 20.1 as a modification.
MO 149	5	Appendix 5  Viability Sub-para 2 a.	a. <del>a.</del> adding a kitchen and serving food, or improving the existing food offer	Delete superfluous sub-para numbering – a.
MO 150	5	Appendix 5  Viability Sub-para 2 f.	f. <del>f.</del> provision of bed & breakfast or other guest accommodation	Delete superfluous sub-para numbering – f.
MO 151	5	Appendix 5  Marketing Statement Sub para 4 b.	b. <del>b.</del> adverts in the local press	Delete superfluous sub-para numbering – b.
MO 152	5	Appendix 6	Updates to the key findings, targets table and housing trajectory	To update Appendix 6 with latest information to provide an up to date position on the delivery of housing sites
<b>Chapter 21 – Schedules</b>				
MO 153	5	Schedule 1 Table 21.1	Schedule 1. Table 21.1 Livesey Memorial Hall should be added to the list of Local Landmarks	Determine whether the identified site has been identified as a local landmark.  Subject to this being the case consider its addition to Table 21.1 as a minor modification (omission).  Otherwise – no further action required.5
MO 154	5	Schedule 1	p 802, Table 21.1 LEWISHAM LOCAL VIEWS The view from Sydenham Hill Ridge towards the City of London is missing from the tables of London Strategic Views and Lewisham Local Landmarks. This view is as important as the Horniman Gardens view and should be reinstated	Review the content of Schedule 1 Figure 21.1 Strategic and local views, vistas, and landmarks. Determine whether any content has been omitted and amend accordingly.
MO 155	5	Schedule 2  Table 21.2	Schedule 2. Table 21.2 Missing from Conservation Area list - The Thorpes Conservation Area.  Table 21.2 London Squares – Taymount Rise is missing from the list.  Fambridge close is NOT the substitute for the designated Stanton Square. Stanton Square was redeveloped without substitution, and restitution attempts are in process.	Introduce an amendment to Table 21.1 to include Sydenham Thorpes Conservation Area as a minor modification.  Determine whether the identified sites are designated heritage assets.  Subject to these being a designated heritage asset consider their addition to Table 21.2 as a minor modification (omission).
MO 156	5	Schedule 2  Table 21.2	<b>p 803, Table 21.2 CONSERVATION AREAS</b>	Amend Schedule 2 Table 21.2 to include Sydenham Thorpes Conservation Area as a factual modification.

Modification reference	Part	Section, policy, or paragraph	Proposed Modification ( <del>deleted text in strikethrough</del> , <u>new text underlines</u> )	Reason for change
			Sydenham Thorpes is missing from the schedule of Conservation Areas, as is the Thorpes Extension which takes in the commercial terraces of Sydenham Road and was designated in 2007.	
MO 157	5	Schedule 6 Table 21.6	118 Stanstead Road, west of the railway line within Forest Hill District Centre, <del>Horniman's</del> <u>the Horniman</u> Museum and Gardens and Horniman Play Park.	Correct reference.
MO 158	5	Schedule 7 Table 21.7	Leslie Silk, <del>,</del> <u>Overdown Rd</u> (north)	Delete superfluous punctuation – delete extra comma
MO 159	5	Schedule 12	Consider modification (omission) text in Schedule 12: Tall Building Suitability Zones, to align with Figures 5.3-5.10 of the new Local Plan, in relation to the following sites: <u>Evelyn Court LSIS 35</u> <u>Neptune Wharf MEL 25</u> <u>Lewisham Retail Park 35</u> <u>Axion House 16</u> <u>Land at Conington Road and Lewisham Road 16</u> <u>Lewisham Gateway 35 with 16 storeys in south eastern corner</u> <del>Church Grove self build site 16</del> <u>Stanton Square LSIS 12</u>	
MO 160	5	Schedule 5  table 21.5	The Council will consider minor modifications to the boundary of the Bromley Road SIL and Local Centre and to Table 21.5 Table showing Town Centres and Primary Shopping Centres, to rectify the error.	The Council agrees that the SIL boundary should include no.4 Randlesdown Road whilst the row of retail units/takeaways should lie outside of the SIL boundary.
<b>Policies Map</b>				
MO 161	PM	Policies Map	However, in the interests of positive partnership working, the Council could consider the implications of mapping the full extent of the Maritime Greenwich World Heritage site buffer zone on the new Local Plan proposals map.	
<b>Infrastructure Delivery Plan</b>				
MO 162	IDP		Amend the wording of the Infrastructure Delivery Plan to reflect Transport for London's anticipated timetable for the implementation of the Bakerloo Line Extension.  Amend the Infrastructure Delivery Plan to remove reference to the former proposals for the New Cross to Lewisham Overground Extension.	The Council welcomes the comments made in relation to the Lewisham Infrastructure Delivery Plan. Although this is not considered to be a matter of soundness for the new Local Plan the Council will seek to amend the content of the Infrastructure Delivery Plan accordingly.
MO 163	IDP		Amend the wording of the Infrastructure Delivery Plan to reflect the factual position of the ULEZ expansion.	The Council welcomes the comments made in relation to the Lewisham Infrastructure Delivery Plan. Although this is not considered to be a matter of soundness for the new Local Plan the Council will seek to amend the content of the Infrastructure Delivery Plan accordingly.
MO 164	IDP		Confirm the factual position on this matter and amend the Infrastructure Delivery Plan accordingly.  Amend the Infrastructure Delivery Plan to remove reference to the former proposals for the New Cross to Lewisham Overground Extension.	The Council welcomes the comments made in relation to the Lewisham Infrastructure Delivery Plan. Although this is not considered to be a matter of soundness for the new Local Plan the Council will seek to amend the content of the Infrastructure Delivery Plan accordingly.
MO 165	IDP		Amend the Infrastructure Delivery Plan to reflect the factual position on the number of replacement DLR trains being provided.	The Council welcomes the comments made in relation to the Lewisham Infrastructure Delivery Plan. Although this is not considered to be a matter of soundness for the new Local Plan the Council will seek to amend the content of the Infrastructure Delivery Plan accordingly.